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6 UNITED STATES DISTRICT COURT
7 EASTERN DISTRICT OF CALIFORNIA
8 FRESNO DIVISION

9 Cristian Amaya-Quinteros,

10 Petitioner,

11 v.

12 CORECIVIC, INC., a Maryland corporation,
13 operating the California City Detention
14 Facility; Kristi NOEM, Secretary of the
15 Department of Homeland Security; Pamela
16 BONDI, U.S. Attorney General; in their
17 official capacity; Moises BECERRA, in his
18 official capacity as Field Office of
19 Immigration and Customs Enforcement,
20 Enforcement and Removal Operations.

21 Respondents.

Case Number: _____

**VERIFIED PETITION FOR WRIT OF
HABEAS CORPUS AND
DECLARATORY AND INJUNCTIVE
RELIEF FOR AN ORDER TO SHOW
CAUSE**

INTRODUCTION

22 1. Petitioner has been granted Special Immigrant Juvenile (SIJ) status—that Congress
23 created to protect vulnerable youth and that, by statute, places him on a clear path to lawful
24 permanent residency. After the Department of Homeland Security processed him for expedited
25 removal in January 2022, the agency itself released him from custody within days into the United
26 States and took no further action on the case for nearly four years. During that time, Petitioner
27 remained in the community, applied for asylum, obtained state-court findings of abuse and
28 abandonment, secured a guardian, and was granted SIJ classification and deferred action by the

1 United States Citizenship and Immigration Service. Despite all of this—and despite the fact that
2 SIJ status renders him paroled for adjustment and no longer inadmissible on the grounds
3 underlying the expedited removal order—DHS suddenly re-detained him on November 24, 2025
4 without any lawful reason, explanation, or statutory authority, based solely on a long-dormant
5 expedited removal order whose 90-day removal period expired years ago. DHS’s decision to
6 revive that order and incarcerate a youth whom Congress has expressly placed on a path to
7 permanent residency is unauthorized, arbitrary, and directly contrary to the statutory protections
8 afforded to SIJ recipients.
9

10
11 2. Nothing in the Immigration and Nationality Act, its implementing regulations, or any
12 binding precedent authorizes DHS to revive an expedited removal order years after releasing a
13 noncitizen from custody, or to resurrect a long-abandoned credible fear process nearly four years
14 after the statutory deadlines have passed. Credible fear screenings are required to occur
15 promptly, and expedited removal is—by design—supposed to be “expedited.” DHS’s decision to
16 take no action for almost four years, only to suddenly retake Petitioner into custody, undermines
17 the purpose of the expedited removal statute and infringes on Petitioner’s SIJ pathway to
18 adjustment of status. The INA provides no mechanism permitting DHS to place a noncitizen into
19 years-long limbo and then detain him based on a previously dormant order whose removal period
20 expired long ago. It is especially egregious in this case where Petitioner has obtained an
21 immigration benefit that will lead to lawful permanent residence.
22

23
24 3. Compounding this unlawfulness, DHS’s sudden detention of Petitioner directly
25 contradicts the protections Congress established for SIJ recipients under 8 U.S.C. § 1255(h). By
26 statute, SIJ beneficiaries are treated as paroled for purposes of adjustment, and several grounds
27 of inadmissibility—including the very provisions that originally triggered expedited removal—
28

1 no longer apply to them. DHS cannot lawfully argue that Petitioner is removable or that his
2 removal is reasonably foreseeable while the agency itself has granted him SIJ status, deferred
3 action, and a priority date that bars him from adjusting for several years due solely to visa
4 backlogs. Detaining a youth whom Congress has expressly protected and who is halfway through
5 the adjustment process is not merely illogical—it is *ultra vires*.
6

7 4. DHS’s abrupt decision to re-detain Petitioner after nearly four years of inaction also
8 violates the constitutional and statutory limits recognized in *Zadvydas v. Davis*, 533 U.S. 678,
9 689, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001), which prohibits detention beyond the 90-day
10 removal period absent a realistic prospect of removal in the reasonably foreseeable future. Here,
11 removal is not only unforeseeable—it is legally impermissible while Petitioner awaits his SIJ-
12 based adjustment of status. DHS’s conduct effectively imposes indefinite detention on a youth
13 whom Congress intended to safeguard, not incarcerate. It is precisely the type of arbitrary and
14 unauthorized executive action that the Great Writ exists to prevent.
15
16

17 JURISDICTION

18 5. This action arises under the Constitution of the United States; Immigration and
19 Nationality Act of 1952 (INA) as amended at 8 U.S.C. §§ 1101, *et seq.*; and the William
20 Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 (TVPRA 2008), Public
21 Law 110-457, 112 Stat. 5044 (Dec. 23 2008), codified in relevant part at 8 U.S.C. §
22 1232(c)(2)(B).
23

24 This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28
25 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution
26 (Suspension Clause). Under 8 U.S.C. § 1252(e)(2), this Court has habeas authority to determine
27 whether Petitioner was ordered removed under 8 U.S.C. § 1225(b)(1).
28

1 6. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et seq.*,
2 the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C.
3 § 1651.
4

5 **PARTIES**

6 7. Petitioner is a native and citizen of El Salvador who was processed for expedited
7 removal and referred for a credible fear interview on January 26, 2022, but released from
8 detention shortly thereafter for health reasons on January 31, 2022. While Petitioner was out of
9 custody he affirmatively applied for asylum with USCIS on June 6, 2022 and was granted special
10 immigrant juvenile status on June 27, 2023. While Petitioner was awaiting his asylum interview
11 and an eligibility date to file his adjustment of status, he was sent a letter requesting his
12 appearance at a credible fear interview set for November 24, 2025 at the San Francisco Asylum
13 Office. Petitioner was detained at his interview by Department of Homeland Security officials
14 and taken to California City Detention Facility.
15
16

17 8. Respondent, CORECIVIC, INC. is a Maryland corporation that operates the California
18 City Detention Facility where Petitioner is currently located.

19 9. Respondent, Moises BECERRA, is the Field Office of Immigration and Customs
20 Enforcement Director of Enforcement and Removal Operations who exercises custody decisions
21 over Petitioner.
22

23 10. Defendant, Kristi NOEM is the Secretary of the Department of Homeland Security and
24 as such, is charged with the supervision, oversight, and direction of the DHS.

25 11. Defendant, Pamela BONDI, is the United States Attorney General and as
26 such is the official charged with the enforcement of the laws of the United States and the
27 official charged with the enforcement of the laws of the nation.
28

1 VENUE

2 12. Venue is proper because Petitioner is detained at California City Corrections Center,
3 located at 22844 Virginia Boulevard, in California City, California that is within the jurisdiction
4 of this District.
5

6 REQUIREMENTS OF 28 U.S.C. § 2243

7 13. The Court must grant the petition for writ of habeas corpus or issue an order to show
8 cause (OSC) to the respondents “forthwith,” unless the petitioner is not entitled to relief. 28
9 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a
10 return “within *three days* unless for good cause additional time, not exceeding twenty days, is
11 allowed.” *Id.* (emphasis added).
12

13 14. Courts have long recognized the significance of the habeas statute in protecting
14 individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most
15 important writ known to the constitutional law of England, affording as it does a *swift* and
16 imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391,
17 400 (1963) (emphasis added)
18

19 FACTS

20 15. On November 11, 2021, Petitioner was encountered by Department of Homeland
21 Security Officials in the locked cargo area of a U-Haul truck driven by a smuggler along
22 Highway 35 in Laredo, Texas. (See Exh. A.)
23

24 16. Petitioner was held for over two months until he was subsequently processed for
25 expedited removal on January 26, 2022. (See Exh. B.) He was ordered removed under Section
26 235(b)(1) of the Immigration and Nationality Act for a period of five years. (See Exh. C.)
27
28

1 17. The expedited removal order was not executed because, Petitioner expressed a fear of
2 being returned to El Salvador. Based on his redacted FOIA records, it appears he attended a
3 credible fear interview with the assistance of a Spanish interpreter before USCIS but the results
4 are unknown. (See Exh. D.)
5

6 18. The outcome of the credible fear interview is unknown due to redactions in Petitioner's
7 records. A search of the EOIR automated system did not reveal any scheduled removal
8 proceedings before an Immigration Judge that would indicate a Notice to Appear had been issued
9 under Section 240 of the Act, suggesting a positive determination was recorded and that the prior
10 order was vacated. (See Exh. E.)
11

12 19. On January 31, 2022, five days after his expedited removal order was issued, Petitioner
13 was released into the United States by the DHS after being identified as having a chronic care
14 condition. (See Exh. F.)
15

16 20. On April 18, 2022, Petitioner applied for asylum with USCIS. (See Exh. G.)

17 21. On October 3, 2022, Petitioner submitted a petition for Special Immigrant Juvenile (SIJ)
18 findings and appointment of a guardian in the California Superior Court in Alameda County.
19 (See Exh. H.)
20

21 22. The California Superior Court subsequently granted the guardianship and SIJ petitions.
22 (See Exh. I.)

23 23. On October 22, 2022, Petitioner filed a Form I-360 petition for SIJ status with USCIS.
24 (See Exh. J.)
25
26
27
28

1 24. On June 27, 2023, Petitioner's SIJ application was granted, along with deferred action.¹
2 (See Exh. K.).

3
4 25. Currently, only SIJs with priority dates (approval dates) before July 1, 2020 may file for
5 adjustment of status to become lawful permanent residents.² (See Exh. L.).

6 26. As of September 2025, there were over 242,689 individuals, including Petitioner, with
7 approved petitions waiting for visa availability.³

8 27. On November 12, 2025, Petitioner received a notice scheduling him for a credible fear
9 interview at the San Francisco Asylum Office. (See Exh. M.)

10 28. On November 24, 2025, Petitioner appeared for the scheduled credible fear interview.

11 29. Following the interview, Petitioner was detained by DHS officials and transferred to
12 California City Corrections Center, located at 22844 Virginia Boulevard, California City, CA
13 93505. (See Exh. N.)

14
15 30. It is unknown when the DHS will afford Petitioner a review hearing before an
16 Immigration Judge if the asylum officer made a negative credible fear determination.

17 31. Due to the Thanksgiving Holiday and Petitioner's detention days before communication
18 with DHS officials about their intentions on removal have become impracticable.
19
20

21
22 ¹ USCIS, consistent with its discretionary authority to defer removal under Volume 6, Part J —
23 "Special Immigrant Juveniles," Chapter 4, Part G.1 ("Prior Grants of SIJ Deferred Action"),
24 provides:

25 If USCIS previously granted deferred action to an alien with SIJ classification in the exercise of
26 discretion, the alien's deferred action remains valid for the authorized period, unless terminated
27 by USCIS on a case-by-case basis. USCIS will not consider requests for renewal of deferred
28 action for aliens with SIJ classification who remain ineligible to apply for adjustment of status
because an immigrant visa number is not immediately available.

² U.S. Department of State, Visa Bulletin, Number 8, Volume XI, Washington, D.C. found at
https://travel.state.gov/content/dam/visas/Bulletins/visabulletin_November2025.pdf

³ See USCIS Immigration and Citizenship Data, Form I-140, I-360, I-526, Approved
Employment-Based Petitions Awaiting Visa Availability found at
<https://www.uscis.gov/tools/reports-and-studies/immigration-and-citizenship-data>.

1 32. Undersigned Counsel emailed this petition together with motion for temporary
2 restraining order to the San Francisco Field Office for Enforcement and Removal Operations.

3
4 33. This writ petition followed.

5 **LEGAL FRAMEWORK**

6 If an immigration officer determines that an alien who is arriving in the United States is
7 inadmissible under section 1182(a)(6)(C) or 1182(a)(7) of this title, the officer shall order the
8 alien removed from the United States without further hearing or review unless the alien indicates
9 either an intention to apply for asylum under section 1158 of this title or a fear of persecution. 8
10 U.S.C. § 1225(b)(1)(A)(i). The inspecting officer shall not proceed further with removal of the
11 alien until referred to a USCIS asylum officer and if it is determined that the alien has a credible
12 fear, may refer to the alien to proceedings under section 240 of the Act. 8 C.F.R. § 208.30(b). If
13 the alien is not found to have a credible fear of persecution, the alien may request a review with
14 the Immigration Judge. 8 C.F.R. § 208.30(g). Collateral attacks on expedited removal orders are
15 limited by statute. 8 U.S.C. § 1252(a)(2)(A).
16
17

18 Judicial review of expedited removal orders is governed by section 1252, which provides
19 that “no court shall have jurisdiction to review” an expedited removal order except as provided
20 in subsection (e). 8 U.S.C. § 1252(a)(2)(A). Subsection (e) in turn limits judicial review to three
21 narrow issues, each of which must be raised in habeas corpus proceedings: “whether the
22 petitioner is an alien”; “whether the petitioner was ordered removed” under
23 an expedited removal order; and whether the petitioner can prove that he or she has lawful status
24 in the United States as an asylee, refugee, or permanent resident. § 1252(e)(2).
25
26

27 The Attorney General is required to remove an alien from the United States after an order
28 of removal, within the ninety-day “removal period.” 8 U.S.C. § 1231(a)(1)(A). Thus, the DHS

1 has a statutory duty to effect removal within the removal period, if possible. *Xi v. United States*
2 *I.N.S.*, 298 F.3d 832, 840 n. 6 (9th Cir.2002); *Ulysse v. Dep't of Homeland Sec.*, 291 F.Supp.2d
3 1318, 1324 (M.D.Fla.2003). The removal period begins on the latest of the following: (i) the date
4 the order of removal becomes administratively final; (ii) if the removal order is judicially
5 reviewed and if a court orders a stay of the removal of the alien, the date of the court's final
6 order; or (iii) if the alien is detained or confined (except under the removal process), the date the
7 alien is released from detention or confinement. 8 U.S.C. § 1231(a)(1)(B). The 90-day removal
8 period does not begin when a noncitizens is detained, but when the final order of removal is
9 entered. *Ulysse v. Dep't of Homeland Sec.*, 291 F. Supp. 2d 1318, 1325 (M.D. Fla. 2003). [ICE's
10 unexplained delay beyond the 90-day removal period does not suspend the removal period,
11 pursuant to 8 U.S.C. § 1231(a)(1)(C)]. *Ulysse v. Dep't of Homeland Sec.*, 291 F. Supp. 2d 1318,
12 1326 (M.D. Fla. 2003).

13
14
15
16 An order of removal entered by an immigration judge in the alien's absence becomes
17 final immediately upon entry of the order. 8 C.F.R. § 1241.1(e). Under certain circumstances, the
18 removal period may be extended, or "tolled." Section 1231(a)(1)(C) provides:

19
20 The removal period shall be extended beyond a period of 90 days
21 and the alien may remain in detention during such extended period
22 if the alien fails or refuses to make timely application in good faith
23 for travel or other documents necessary to the alien's departure or
24 conspires or acts to prevent the alien's removal subject to an order
25 of removal.

26
27 During the 90-day removal period, detention of the alien is mandatory. 8 U.S.C. §
28 1231(a)(2). Where ICE does not fulfill its responsibility of detaining the alien within the removal
period, the removal period does not become extended under § 1231(a)(1)(C) and is governed by
the supervision statute at § 1231(a)(3) and its implementing regulations. *Farez-Espinoza v.*
Chertoff, 600 F. Supp. 2d 488, 502 (S.D.N.Y. 2009)[Habeas relief granted where the record

1 indicated that Farez–Espinoza had no previous history of disciplinary infractions, criminal
2 conduct or convictions, psychiatric problems, or prior immigration violations; had strong ties to
3 the United States and the New York metropolitan area, including her father and step-mother, a
4 naturalized United States citizen since 1988; and there was no evidence she would present a
5 flight risk, pose a danger to the community or violate the conditions of her release pending the
6 conclusion of her proceedings in Immigration Court].
7

8 If the alien does not leave or is not removed within the removal period, the alien, pending
9 removal, shall be subject to supervision under regulations prescribed by the Attorney General.” 8
10 U.S.C. § 1231(a)(3). Those regulations require that before making a recommendation or decision
11 to release a detainee, a determination must be made that travel documents for the alien are not
12 available or that immediate removal, while proper, is otherwise not practicable or not in the
13 public interest; the detainee is non-violent and likely to remain nonviolent if released; the
14 detainee is not likely to pose a threat to the community following release; the detainee is not
15 likely to violate the conditions of release; and the detainee does not pose a significant flight risk
16 if released. 8 C.F.R. § 241.4(e).
17
18

19 The regulations also provide certain factors that should be weighed in considering
20 whether to recommend further detention or release:
21

- 22 (1) The nature and number of disciplinary infractions or
23 incident reports received when incarcerated or while in
Service custody;
- 24 (2) The detainee's criminal conduct and criminal convictions,
25 including consideration of the nature and severity of the
26 alien's convictions, sentences imposed and time actually
served, probation and criminal parole history, evidence of
recidivism, and other criminal history;
- 27 (3) Any available psychiatric and psychological reports
pertaining to the detainee's mental health;
- 28 (4) Evidence of rehabilitation ...

- 1 (5) Favorable factors, including ties to the United States such
- 2 as the number of close relatives residing here lawfully;
- 3 (6) Prior immigration violations and history;
- 4 (7) The likelihood the alien is a flight risk or may abscond to
- 5 avoid removal ...
- 6 (8) Any other information that is probative of whether the alien
- 7 is likely to—
- 8 (i.) Adjust to life in a community,
- 9 (ii.) Engage in future acts of violence,
- 10 (iii.) Engage in future criminal activity,
- 11 (iv.) Pose a danger to the safety of himself or
- 12 herself or to other persons or to property, or
- 13 (v.) Violate the conditions of his or her release
- 14 from immigration custody pending
- 15 removal from the United States.

16 8 C.F.R. § 241.4(f).

17 Although an alien may be detained beyond the removal period pursuant to 8 U.S.C. §
18 1231(a)(6), this provision does not permit an alien to be detained indefinitely. The Supreme
19 Court has held that continued detention beyond the 90-day removal period must be limited to “a
20 period reasonably necessary to bring about that alien's removal.” *Zadvydas v. Davis*, 533 U.S.
21 678, 689, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001). That reasonably necessary period, in turn, is
22 limited to the period during which removal is reasonably foreseeable; “if removal is not
23 reasonably foreseeable, the court should hold continued detention unreasonable and no longer
24 authorized by statute.” *Id.* at 699–700, 121 S.Ct. 2491. After a period of mandatory detention
25 expires, “once the alien provides good reason to believe that there is no significant likelihood of
26 removal in the reasonably foreseeable future, the Government must respond with evidence
27 sufficient to rebut that showing.” *Id.* at 701, 121 S.Ct. 2491 (related to post-removal period
28 detentions).

The William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008,
Pub. L. No. 110-457, 122 Stat. 5044, 5074 (2008) was enacted “...to enhance the efforts of the

1 United States to prevent trafficking in persons, the Secretary of Homeland Security, in
2 conjunction with the Secretary of State, the Attorney General, and the Secretary of Health and
3 Human Services, shall develop policies and procedures to ensure that unaccompanied alien
4 children in the United States are safely repatriated to their country of nationality or of last
5 habitual residence.” 8 U.S.C. § 1232(a)(1). The TVPRA amended section 245(h)(2)(A) of the
6 Immigration and Nationality Act (8 U.S.C. 1255(h)(2)(A) to allow youths granted special
7 immigrant juvenile status who are inadmissible due to certain immigration violations to apply for
8 adjustment of status. Pub. L. No. 110-457, 122 Stat. 5044, 5080 (2008). Where an alien has been
9 granted special immigrant juvenile status by the USCIS, they are considered paroled for the
10 purposes of adjustment of status and paragraphs (6)(C), (6)(D), (7)(A), and (9)(B) of § 1182(a)
11 do not apply as grounds of inadmissibility. 8 U.S.C. § 1255(h). To qualify for adjustment of
12 status, the SIJ must have a visa available to them. 8 U.S.C. § 1153(b)(4). Visas are limited to 7.1
13 percent of the worldwide level to special immigrant juveniles. *Id.*

14
15
16
17 Adjustment of status is available only to noncitizens physically present in the United
18 States. *See* 8 U.S.C. § 1255(a); 8 U.S.C. § 245.2(a)(1); U.S. Citizenship & Immigr. Servs., Form
19 I-485 Instructions at 2 [You must be **physically present** in the United States to file this
20 application].

21 **CLAIMS FOR RELIEF**

22 **COUNT ONE**

23 **Violation of 8 U.S.C. § 1231(a)(1)(C) and Implementing Regulations**

24
25
26 34. The allegations set forth in paragraphs 15 through 31 above are repeated and re-alleged
27 as though fully set forth herein.

28 35. Petitioner is currently detained well beyond the 90-day removal period under 8 U.S.C. §

1 1231(a)(1)(A). There is no evidence that he poses a danger to the community, a risk of flight or a
2 threat to property.

3
4 **COUNT TWO**

5 **Violation of U.S. Const. amend. V**

6 36. The allegations set forth in paragraphs 15 through 31 above are repeated and re-alleged
7 as though fully set forth herein.

8 37. The government has not demonstrated that removal is reasonably foreseeable because he
9 has been granted special immigrant juvenile status which makes inapplicable all grounds of
10 inadmissibility relating to expedited removal and paroles him for the purposes of adjustment of
11 status.

12
13 38. Petitioner's visa is caught up in the backlog of SIJ-based adjustment applications
14 currently at 242,689 as of the third quarter of 2025. Petitioner's deferred action, SIJ status, and
15 visa backlog demonstrates that removal is not imminent if his adjustment of status application
16 were to be denied years from now. Continued detention in these circumstances is therefore
17 unreasonable.

18
19 39. For these reasons, continued detention under these circumstances is not justified.
20

21 **COUNT THREE**

22 **Violation of 8 U.S.C. § 1255(h)(2)**

23 40. The allegations set forth in paragraphs 15 through 31 above are repeated and re-alleged
24 as though fully set forth herein.

25
26 Petitioner has been granted special immigrant juvenile status and can be paroled for
27 adjustment of status because he is no longer inadmissible under (6)(C) or (7)(A), of section
28 1182(a). The Department of Homeland Security violated 8 U.S.C. § 1255(h)(2) by detaining him

1 pursuant to the expedited removal order even though his inadmissibility under (6)(C) or (7)(A),
2 of section 1182(a) no longer apply. 8 U.S.C. § 1255(h)(2)(A).

3
4 41. Petitioner was also granted deferred action on June 27, 2023. Deferred action is a
5 discretionary, non-punitive form of relief that allows vulnerable minors to remain in the United
6 States while pursuing lawful status. USCIS policy explicitly recognizes that prior grants of
7 deferred action for SIJs remain valid for the authorized period, unless revoked on a case-by-case
8 basis, and that deferred action is intended to provide stability and protection for SIJs during
9 delays in the availability of immigrant visas (USCIS Policy Manual, Volume 6, Part J, Chapter 4,
10 Part G.1).

11
12 42. The purpose of the William Wilberforce Trafficking Victims Protection Reauthorization
13 Act of 2008, Pub. L. No. 110-457, 122 Stat. 5044, 5074 (2008) was to enhance the efforts of the
14 United States to prevent trafficking in persons and provide minors granted special immigrant
15 juvenile status an opportunity to apply for adjustment of status while in the United States despite
16 previous immigration violations. Petitioner was encountered in the locked cargo area of a U-Haul
17 truck being driven by a smuggler. Petitioner was a trafficking victim and minor who the
18 California Superior Court found to be a special immigrant juvenile. The USCIS agreed with the
19 California Superior Court and granted him special immigrant juvenile status with deferred
20
21
22 action.

23 43. If Petitioner were removed to El Salvador, he would be unable to adjust his status from
24 abroad and it would be entirely within the discretion of the United States Government to parole
25 him into the country to apply for adjustment of status once his priority date comes up. This
26
27 practice by the Government would frustrate the purposes of the William Wilberforce Trafficking
28 Victims Protection Reauthorization Act of 2008 because the DHS could simply remove all

1 individuals granted special immigrant juvenile status who have previous immigration violations
2 and awaiting their priority date for adjustment of status. The Government could then exercise its
3 unreviewable discretion to deny them parole to complete the adjustment of status process in the
4 United States. 8 U.S.C. § 1252(a)(2)(B)(ii), INA § 212(d)(5)(A), 8 C.F.R. § 212.5(a).

5
6 44. For these reasons, continued detention under these circumstances is not justified.

7 **PRAYER FOR RELIEF**

8 **WHEREFORE**, Plaintiff's pray this Honorable Court and demands judgment against
9 defendants as follows:

10
11 Wherefore, Petitioner respectfully requests this Court to grant the following:

- 12 (1) Assume jurisdiction over this matter;
- 13 (2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition
14 should not be granted within three days.
- 15 (3) Declare that Petitioner's detention violates the Due Process Clause of the Fifth
16 Amendment, 8 U.S.C. § 1231(a)(1)(C) and 8 C.F.R. § 241.4(e);
- 17 (4) Issue a Writ of Habeas Corpus ordering Respondents release Petitioner immediately;
- 18 (5) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on
19 any other basis justified under law; and
- 20 (6) Grant any further relief this Court deems just and proper.

21
22
23 Date: November 29, 2025

Respectfully Submitted,

24 /s/ Mario Salgado
25 Mario Salgado, Esq.
26 **SALGADO & PERALTA, P.A.**
27 **605 Market Street Suite 1111**
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28 **Tel: 415.401.8699**

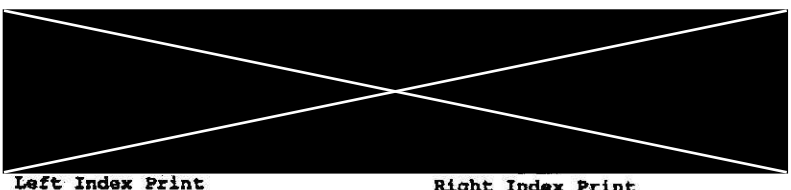
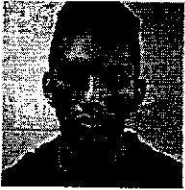
EXHIBIT A

U.S. Department of Homeland Security

Subject ID: 373800599

Record of Deportable/Inadmissible Alien

Family Name (CAPS) AMAYA-QUINTEROS, CRISTIAN		Sex M	Hair BLK	Eyes BRO	Complexion MED
Country of Citizenship EL SALVADOR	Passport Number and Country of Issue A220 863 526	File Number CASE No: LRN2211000102	Height 65	Weight 115	Occupation Laborer
U.S. Address 566 VETERANS DRIVE PEARSALL, TEXAS, 78061					
Date, Place, Time, and Manner 11/21/2021, 0915		(b)(7)(e)		Passenger Boarded at	
Number, Street, City, Province (State) and Country of Permanent Residence CABANAS, CABANAS, EL SALVADOR					
Date of Birth [REDACTED]	Age: 20	Date of Action 01/26/2022	Location Code LRT/LRN		
City, Province (State) and Country of Birth CABANAS, CABANAS, EL SALVADOR		Form: (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/>			
NIV Issuing Post and NIV Number		Social Security Account Name			
Date Visa Issued		Social Security Number			
Immigration Record NEGATIVE			Criminal Record None Known		
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)				Number and Nationality of Minor Children 1 - EL SALVADOR	
Father's Name, Nationality, and Address, if Known See Narrative			Mother's Present and Maiden Names, Nationality, and Address, if Known See Narrative		
Monies Due/Property in U.S. Not in Immediate Possession None Claimed		Fingerprinted? <input type="checkbox"/> Yes <input type="checkbox"/> No	Systems Checks See Narrative	Charge Code Word(s) I7A1	
Name and Address of (Last) Current U.S. Employer		Type of Employment	Salary	Employed from/to	
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which...					



CREDIBLE FEAR CLAIM

ARREST COORDINATES:

Latitude:
Longitude:

(b)(7)(e)

CONSEQUENCE DELIVERY SYSTEM:

Classification: **FIRA**

Alien has been advised of communication privileges

01/26/2022

(Date/Initials)

(Signature and Title of Immigration Officer)

Distribution:

ER/CF
FIRA
EL SALVADOR

(b)(7)(c)

Received: (Subject and Documents) (Report of Interview)

Officer:

(b)(7)(c)

on: **January 26, 2022 at 1111**

Disposition: **Expedited Removal with Credible Fear**

Examining Officer:

U.S. Department of Homeland Security

Continuation Page for Form

I213

Alien's Name AMAYA-QUINTEROS, CRISTIAN	[Redacted]	Date 01/26/2022
---	------------	--------------------

ARRESTING AGENT:

[Redacted]

(b)(7)(c)

FATHER NAME AND ADDRESS:

 Nationality: EL SALVADOR AMAYA-VARGAS, VICTOR MANUEL
 CABANAS, CABANAS, EL SALVADOR

MOTHER NAME AND ADDRESS:

 Nationality: EL SALVADOR QUINTEROS, ROSALINA
 CABANAS, CABANAS, EL SALVADOR

FUNDS IN POSSESSION:

 Mexican Peso 11.00 *bcm*

RECORDS CHECKED:

[Redacted]

(b)(7)(e)

NARRATIVE:

ENCOUNTER:

A Laredo Sector Border Patrol Agent encountered the above subject in the [Redacted] area near Laredo, TX area near Laredo in Webb County. After a brief interview, it was determined that the subject had unlawfully entered into the United States from Mexico by swimming across the Rio Grande River. Subject was not at the time inspected or admitted by an Immigration Officer at a port of entry as designated by the Secretary of Homeland Security. Subject further admitted to being a citizen and national of El Salvador with no right to be in or remain in the United States legally. The subject was placed under arrest and advised of his rights and transported to the Laredo Sector Centralized Processing Unit in Laredo,

Signature	[Redacted]	Title	Border Patrol Agent
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(b)(7)(c)

U.S. Department of Homeland Security

Continuation Page for Form

I213



Alien's Name AMAYA-QUINTEROS, CRISTIAN	File Number 	Date 01/26/2022
Texas for further processing.		
CRIMINAL HISTORY: See attached record checks.		
IMMIGRATION HISTORY: See attached record checks.		
HEALTH SCREEN: Subject was pre-screened for any health related concerns by on-duty Emergency Medical Technician and/or Loyal Source Government Services (LSGS) staff and monitored while in custody. Subject did not show any health related concerns that would require medical clearance at this time.		
CONSULAR NOTIFICATION: The Subject's right to communicate with a Consular Officer of the subject's native country was offered. Subject understood but declined the right to contact the Consular Officer at this time. Subject claimed fear if returned to his native country of citizenship.		
DISPOSITION: Subject is being processed for Expedited Removal with Credible Fear. Service Form I-867 A/B was read and explained to the subject. Subject will be turned over to ICE/ERO custody pending an interview by an Asylum Officer.		
Signature		(b)(7)(c) Title Border Patrol Agent

EXHIBIT B

U.S. Department of Homeland Security

Office: LAREDO, TX, BORDER PATROL SECTOR
HEADQUARTERS

File No
Event

Statement by: AMAYA-QUINTEROS, CRISTIAN

In the case of: CRISTIAN AMAYA-QUINTEROS

Date of Birth:

Gender (select one): Male Female

At: LAREDO, TX, BORDER PATROL SECTOR HEADQUARTERS Date: January 26, 2022

Before: ALEX TORRES

(Name and Title)

Border Patrol Agent

In the SPANISH language. Interpreter NONE USED 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 have said to you?

A. Yes.

Q. You are being processed for Expedited Removal. Has this been explained to you and do you understand?

A. Yes.

Q. Do you understand the charges against you and that you are being formally deported?

A. Yes.

Q. Would you like to speak to a consulate officer?


A. No.


... (CONTINUED ON I-831)

U.S. Department of Homeland Security

Continuation Page for Form

I867A

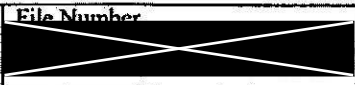

Alien's Name CRISTIAN AMAYA-QUINTEROS	File Number 	Date January 26, 2022
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- Q. Are you willing to answer my questions at this time?
A. Yes.
- Q. Do you swear or affirm that all statements you are about to make are true and complete?
A. Yes.
- Q. What is your true and complete name?
A. Cristian AMAYA-Quinteros.
- Q. Have you ever used any other names?
A. No.
- Q. When and where were you born?
A. I was born on  El Salvador .
- Q. What country are you a citizen of?
A. El Salvador.
- Q. What country are your parents a citizen of?
A. El Salvador.
- Q. Do you have any family residing in the United States?
A. No.
- Q. Are you in possession of any immigration documents that allow you to enter or remain in the United States legally?
A. No.
- Q. Do you have any petitions filed on your behalf?
A. No.
- Q. How, when and where did you enter the United States?
A. I crossed the river (Rio Grande River) near Laredo, Texas (November 21,2021)
- Q. Were you inspected by an immigration officer at a Port of Entry?
A. No.
- Q. For what purpose did you come to the United States?
A. I came to work.
- Q. For what length of time did you plan to stay in the United States?
A. I wanted to stay for about ten years.
- Q. Had you entered the United States illegally just before you were arrested?
A. Yes.

Signature  ALEX TORRES	Title Border Patrol Agent
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U.S. Department of Homeland Security

Continuation Page for Form 1867A

Alien's Name CRISTIAN AMAYA-QUINTEROS	File Number 	Date January 26, 2022
<p>Q. Have you ever been apprehended by any law enforcement officers in the United States? A. No.</p> <p>Q. How many times have you been apprehended by the United States Border Patrol for entering the United States illegally? A. This is the first time.</p> <p>Q. Have you ever been ordered removed? A. No.</p> <p>Q. Have you ever lived in the United States before? A. No.</p> <p>Q. Would you be harmed or face persecution if you are returned to your native country? A. Yes.</p> <p>Q. Do you have any questions at this time? A. No.</p> <p><i>cm</i></p>		
Signature  ALEX TORRES	Title Border Patrol Agent	

U.S. Department of Homeland Security

Q: Why did you leave your home country or country of last residence?

A. To work.

Q: Do you have any fear or concern about being returned to your home country or being removed from the United States?

A. Yes. 

Q: Would you be harmed if you are returned to your home country or country of last residence?

A. Yes.

Q: Do you have any question or is there anything else you would like to add?

A. No.

I have read (or have had read to me) this statement, consisting of 1 pages (including this page). I state that my answers are true and correct to the best of my knowledge and that this statement is a full, true and correct record of my interrogation on the date indicated by the above named officer of the Department of Homeland Security. I have initialed each page of this statement (and the corrections noted on page(s) _____).

cm
Signature: CRISTIAN AMAYA-QUINTEROS

Sworn and subscribed to before me at LAREDO, TX, BORDER PATROL SECTOR HEADQUARTERS
on January 26, 2022.


ALEX TORRES
Border Patrol Agent
Signature of Immigration Officer

Witnessed by: 

- * Non-Profit Organization
- ** Referral Service
- *** Private Attorney

List of Pro Bono Legal Service Providers

Updated January 2022

<http://www.justice.gov/eoir/list-pro-bono-legal-service-providers>

TEXAS



Individuals must contact the providers on this list directly to request legal services. Although the providers on this list offer pro bono (free) legal representation, they may not have the capacity at this time to accept new cases.

Disclaimer: As required by 8 C.F.R. § 1003.61, the Executive Office for Immigration Review (EOIR), Office of the Director, maintains a list of organizations and attorneys qualified under the regulations who provide pro bono or free legal services. The information posted on the list is provided to EOIR by the Providers. EOIR does not endorse any of these organizations or attorneys. Additionally, EOIR does not participate in, nor is it responsible for, the representation decisions or performance of the organizations or attorneys.

EXHIBIT C

U.S. DEPARTMENT OF HOMELAND SECURITY

NOTICE TO ALIEN ORDERED REMOVED/DEPARTURE VERIFICATION

A-File No: XXXXXXXXXX

Date: 01/26/2022

Alien's name: CRISTIAN AMAYA-QUINTEROS

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 236 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.

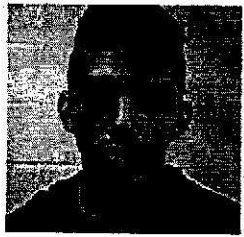
WARNING FOR ALL REMOVED ALIENS: It is a crime under Title 8 United States Code, Section 1326, for an alien who has been removed from the United States to enter, attempt to enter, or be found in the United States without the Secretary of Homeland Security's express consent. Depending on the circumstances 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 2250.

ALEX TORRES (Signature of officer serving warning)	Border Patrol Agent (Title of officer)	LAREDO, TEXAS (Location of DHS Office)
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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

cm
(Signature of alien whose fingerprint and photograph appear above)



Right Index Finger

(Signature of official taking fingerprint)

EXHIBIT D

Information About Credible Fear Interview

You have been placed in expedited removal proceedings because the U.S. Department of Homeland Security (DHS) believes that you may not have the right to stay in the United States. You have also indicated that you intend to apply for asylum, you fear persecution or torture, or you fear returning to your country. This notice explains what will happen while the U.S. Government is considering your case, what rights you have, and what may happen to you as a result of statements you make. **PLEASE READ THIS NOTICE CAREFULLY.**

What is a Credible Fear Interview?

Before DHS can remove you, DHS must interview you to determine if you have a fear of persecution or torture that the U.S. Government needs to consider further. A specially trained asylum officer will interview you. The credible fear interview is not your formal asylum or withholding of removal hearing. The interview is a screening to determine if you are eligible for a hearing before an immigration judge.

You may be detained both before and after the interview if DHS determines that it is appropriate. The interview will usually occur at least 48 hours after you arrive at the detention facility.

What Happens At Your Credible Fear Interview

At your interview, you will have an opportunity to discuss your background and experiences in your country and any other country where you fear harm and explain to the asylum officer the reasons you are pursuing an asylum claim. The officer will take written notes. This may be your only opportunity to provide information about your claim, so it is very important that you tell the asylum officer about any harm you may have suffered in the past and any harm you fear in the future. You also may be asked about conditions in your country. To demonstrate a credible fear of persecution or torture, you must show the officer that you have a credible fear of being persecuted because of your race, religion, nationality, membership in a particular social group or political opinion, or a credible fear of being tortured in your country.

You may request a female or male officer, if this would make it easier for you to speak about information that is very personal or difficult to discuss. You also have the right to speak with the asylum officer separately from your family.

It is very important that you:

- Tell the truth during your credible fear interview. If you do not tell the truth, your statements may be used against you in this or in any future immigration case.
- Tell the officer any reasons why you fear returning to your home country. U.S. law has strict rules to prevent the government from telling others about what you say in your credible fear interview. For example, the U.S. Government will not disclose to your government any information that you provide, except in exceptional circumstances.

Whom You May Consult

While you wait for your interview, you may use this time to prepare and consult with a consultant of your choice as long as it does not unreasonably delay the interview process. The U.S. Government does not provide you with an attorney or representative, but you may choose to hire an attorney or representative, at your expense. You can have a consultant of your choice with you at your interview or participate by telephone.

If you need additional time before your interview to contact someone, inform a DHS officer about your circumstances and explain the reason you need more time. DHS will decide whether your circumstances merit providing you with additional time. You may also request to have the interview earlier if you are prepared to discuss your case immediately.

A list of representatives who may be able to speak to you for free is attached to this notice. Representatives of the United Nations High Commissioner for Refugees (UNHCR) also may be able to assist you with information regarding the credible fear process:

United Nations High Commissioner for Refugees
1800 Massachusetts Avenue N.W., Suite 500, Washington, D.C. 20036
Telephone: 202-296-5191 Email: usawa@unhcr.org Web site: www.unhcr.org

You may call UNHCR toll-free by dialing #566 or 1-888-272-1913 on Monday, Wednesday, and Friday, 2 p.m. - 5 p.m. (Eastern Time).

If you want to call someone, ask a DHS officer for assistance. You may also use the telephone while you are in detention to call a representative, friend, or family member in the United States. You or the person you call must pay for the phone call, if charges apply.

Interpreters

If you do not speak English well or if you want to be interviewed in a language of your choosing, DHS will provide an interpreter for the interview. The interpreter has been told to keep the information you discuss confidential. You may:

- Request another interpreter if the interpreter is not interpreting correctly or you do not feel comfortable with the interpreter.
- Request a female or male interpreter, if this would make it easier for you to speak about information that is very personal or difficult to discuss. DHS will provide them if they are available.

After Your Credible Fear Interview

After your interview, the asylum officer will make a determination on your case. If the asylum officer determines that you have a credible fear of persecution or torture, you will receive a charging document for a hearing in immigration court. At the immigration court hearing, the immigration judge will determine your removability and whether you should be granted protection or relief from removal. You will receive information about the date and time of this hearing. If the asylum officer determines that you do not have a credible fear of persecution or torture, you may ask to have an immigration judge review the asylum officer's negative determination. If you decline this review, you may be removed from the United States.

Immigration Judge Review of a Negative Determination


If you request that an immigration judge review the asylum officer's negative determination, the immigration judge's review will usually happen within 24 hours and no later than 7 days from the date that the supervisory asylum officer concurs with the asylum officer's negative determination. The review will be in person, by telephone, or by video connection. You may consult with a consultant of your choice before the review as long as it does not cause unreasonable delay. You will receive a copy of the asylum officer's determination before the immigration judge review. If any of the information is incorrect, tell the immigration judge.

At the review, the immigration judge will decide that:

- You do not have a credible fear of persecution or torture. You may then be removed from the United States.
- OR
- You have a credible fear of persecution or torture and you are eligible for a full hearing in immigration court where you can apply for asylum or other protection from removal. At the full hearing in immigration court, the immigration judge will determine your removability and whether you should be granted protection or relief from removal. If you are ordered removed, you may not be allowed to reenter the United States for 5 years or longer.

After a Positive Credible Fear Determination by an Asylum Officer or Immigration Judge

If you receive a charging document for proceedings in immigration court and wish to apply for asylum, you must file Form I-589 Application for Asylum and for Withholding of Removal. The Form I-589 and instructions on where to file the Form can be found at www.uscis.gov/i-589. Failure to file Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to INA § 208(a)(2)(B).

Interpreter Certification	
I, <u>ALEX TORRES</u> , certify that I am fluent in both the <u>SPANISH</u> and English languages, and that I have read to this applicant in <u>SPANISH</u> every question and instruction on this form. The applicant informed me that he or she understands every instruction on this form.	
 Interpreter Signature/Interpreter ID (if telephonic)	<u>January 26, 2022</u> Date of Signature (mm/dd/yyyy)

Applicant Acknowledgment of Receipt	
I acknowledge that I have been given notice concerning my credible fear interview. I understand that I may consult with anyone I choose before the interview as long as it does not unreasonably delay the process and is at no expense to the U.S. Government.	
<u>cm</u> Applicant Signature	<u>January 26, 2022</u> Date of Signature (mm/dd/yyyy)

EXHIBIT E


acis.eoir.justice.gov

need bond hearing information.


English 

Enter your A-Number

A-Number *Required

 [What's an A-Number?](#)

Nationality *Required

 [What is Nationality?](#)

No case found for this A-Number.

SUBMIT


 *Case information from this automated resource is provided for convenience only. Documents the immigration court or Board of Immigration Appeals issue to you or your representative are the only official determinations related to your case.*

EXHIBIT F

DEPARTMENT OF HOMELAND SECURITY
NOTICE OF CUSTODY DETERMINATION

Alien's Name: CRISTIAN AMAYA-QUINTEROS

A-File Number: [REDACTED]


Date: 01/31/2022

Event ID: [REDACTED]

Subject ID: [REDACTED]

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that, pending a final administrative determination in your case, you will be:

- Detained by the Department of Homeland Security.
- Released (check all that apply):
 - Under bond in the amount of \$ _____
 - On your own recognizance.
 - Under other conditions. [Additional document(s) will be provided.]

FERNANDO NIETO 
 Name and Signature of Authorized Officer

 Assistant Officer in Charge
 Title

01/31/2022 12:49
 Date and Time of Custody Determination
 DRO - Montgomery County, TX Sub Office

 MONTGOMERY COUNTY TX
 Office Location/Address


You may request a review of this custody determination by an immigration judge.

- I acknowledge receipt of this notification, and
 - I do request an immigration judge review of this custody determination.
 - I do not request an immigration judge review of this custody determination.

Signature of Alien


Date

The contents of this notice were read to CRISTIAN AMAYA-QUINTEROS in the SPANISH language.
(Name of Alien) (Name of Language)


 Name and Signature of Officer

 Deportation Officer
 Title

Name or Number of Interpreter (if applicable)

Alien's Name CRISTIAN AMAYA-QUINTEROS	File Number A 	Date 01/31/2022
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NOTICE OF CUSTODY DETERMINATION
(Continuation)

Pursuant to a review conducted to comply with requirements in *Fraihat v. ICE*, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020), you have been identified as having one or more of the Risk Factors identified by the district court as placing you "at heightened risk of severe illness and death upon contracting the COVID-19 virus."

The Risk Factor(s) in your case are that you:

- Are age 55 or over
- Are Pregnant
- Have a Chronic Care Condition (As confirmed by a medical professional)
Condition: Tobacco use (z87.891)

Upon review of the totality of the circumstances present in your case, it has been determined that you will:

- Be released from custody.
- Remain detained, and the following justification forms the basis for your continued detention: Select ONE

Select Option and Provide Comment

Comments:

Signature F. Nieto	Title AOIC
------------------------------	----------------------

EXHIBIT L



Visa Bulletin

Number 8, Volume XI | Washington, D.C.

Immigrant Numbers for November 2025

A. Statutory Numbers for Preference Immigrant Visas

This bulletin summarizes the availability of immigrant numbers during November for “Final Action Dates” and “Dates for Filing Applications,” indicating when immigrant visa applicants should be notified to assemble and submit required documentation to the National Visa Center.

Unless otherwise indicated on the U.S. Citizenship and Immigration Services (USCIS) website at www.uscis.gov/visabulletininfo, individuals seeking to file applications for adjustment of status with USCIS must use the “Final Action Dates” charts below for determining when they can file such applications. When USCIS determines that there are more immigrant visas available for the fiscal year than there are known applicants for such visas, USCIS will state on its website that applicants may instead use the “Dates for Filing Visa Applications” charts in this Bulletin.

1. **Procedures for determining dates.** Consular officers are required to report to the Department of State documentarily qualified applicants for numerically limited visas; USCIS reports applicants for adjustment of status. Allocations in the charts below were made, to the extent possible, in chronological order of reported priority dates, for demand received by October 1st. If all reported demand could not be satisfied, the category or foreign state in which demand was excessive was deemed oversubscribed. The final action date for an oversubscribed category is the priority date of the first applicant who could not be reached within the numerical limits. If it becomes necessary during the monthly allocation process to retrogress a final action date, supplemental requests for numbers will be honored only if the priority date falls within the new final action date announced in this bulletin. If at any time an annual limit were reached, it would be necessary to immediately make the preference category “unavailable”, and no further requests for numbers would be honored.
2. The fiscal year 2026 limit for family-sponsored preference immigrants determined in accordance with Section 201 of the Immigration and Nationality Act (INA) is 226,000. The worldwide level for annual employment-based preference immigrants is at least 140,000. Section 202 prescribes that the per-country limit for preference immigrants is set at 7% of the total annual family-sponsored and employment-based preference limits, i.e., 25,620. The dependent area limit is set at 2%, or 7,320.
3. INA Section 203(e) provides that family-sponsored and employment-based preference visas be issued to eligible immigrants in the order in which a petition on behalf of each has been filed. Section 203(d) provides that spouses and children of preference immigrants are entitled to the same status, and the same order of consideration, if accompanying or following to join the principal. The visa prorating provisions of Section 202(e) apply to allocations for a foreign state or dependent area when visa issuances will exceed the per-country limit. These provisions apply at present to the following



oversubscribed chargeability areas: CHINA-mainland born, INDIA, MEXICO, and PHILIPPINES.

4. Section 203(a) of the INA prescribes preference classes for allotment of Family-sponsored immigrant visas as follows:

Family-Sponsored Preferences

First: (F1) Unmarried Sons and Daughters of U.S. Citizens: 23,400 plus any numbers not required for fourth preference.

Second: Spouses and Children, and Unmarried Sons and Daughters of Permanent Residents: 114,200, plus the number (if any) by which the worldwide family preference level exceeds 226,000, plus any unused first preference numbers:

- A. **(F2A)** Spouses and Children of Permanent Residents: 77% of the overall second preference limitation, of which 75% are exempt from the per-country limit.
- B. **(F2B)** Unmarried Sons and Daughters (21 years of age or older) of Permanent Residents: 23% of the overall second preference limitation.

Third: (F3) Married Sons and Daughters of U.S. Citizens: 23,400, plus any numbers not required by first and second preferences.

Fourth: (F4) Brothers and Sisters of Adult U.S. Citizens: 65,000, plus any numbers not required by first three preferences.

A. Final Action Dates for Family-Sponsored Preference Class

On the chart below, the listing of a date for any class indicates that the class is oversubscribed (see paragraph 1); "C" means current, i.e., numbers are authorized for issuance to all qualified applicants; and "U" means unauthorized, i.e., numbers are not authorized for issuance. (NOTE: Numbers are authorized for issuance only for applicants whose priority date is **earlier** than the final action date listed below.)

Family-Sponsored	All Chargeability Areas Except Those Listed	CHINA-mainland born	INDIA	MEXICO	PHILIPPINES
F1	08NOV16	08NOV16	08NOV16	22NOV05	22JAN13
F2A	01FEB24	01FEB24	01FEB24	01FEB23	01FEB24
F2B	01DEC16	01DEC16	01DEC16	15DEC07	01OCT12
F3	08SEP11	08SEP11	08SEP11	01MAY01	22SEP04
F4	08JAN08	08JAN08	01NOV06	08APR01	22MAR06

For November, F2A numbers EXEMPT from per-country limit are authorized for issuance to applicants from all countries with priority dates earlier than 01FEB23. F2A numbers SUBJECT to per-country limit are authorized for issuance to applicants chargeable to all countries EXCEPT MEXICO, with priority



dates beginning 01FEB23 and earlier than 01FEB24. All F2A numbers provided for MEXICO are exempt from the per-country limit.

B. Dates for Filing Family-Sponsored Visa Applications

The chart below reflects dates for filing visa applications within a timeframe justifying immediate action in the application process. Applicants for immigrant visas who have a priority date earlier than the application date in the chart below may assemble and submit required documents to the Department of State’s National Visa Center, following receipt of notification from the National Visa Center containing detailed instructions. The application date for an oversubscribed category is the priority date of the first applicant who cannot submit documentation to the National Visa Center for an immigrant visa. If a category is designated “current,” all applicants in the relevant category may file applications, regardless of priority date.

A “C” listing indicates that the category is current, and that applications may be filed regardless of the applicant’s priority date. The listing of a date for any category indicates that only applicants with a priority date which is **earlier** than the listed date may file their application.

Visit www.uscis.gov/visabulletininfo for information on whether USCIS has determined that this chart can be used (in lieu of the chart in paragraph 4.A.) this month for filing applications for adjustment of status with USCIS.

Family-Sponsored	All Chargeability Areas Except Those Listed	CHINA-mainland born	INDIA	MEXICO	PHILIPPINES
F1	01SEP17	01SEP17	01SEP17	01MAR07	22APR15
F2A	22OCT25	22OCT25	22OCT25	22OCT25	22OCT25
F2B	08MAR17	08MAR17	08MAR17	15MAY09	01OCT13
F3	22JUL12	22JUL12	22JUL12	01JUL01	01NOV05
F4	01MAR09	01MAR09	15DEC06	30APR01	01JAN08

- Section 203(b) of the INA prescribes preference classes for allotment of Employment-based immigrant visas as follows:

Employment-Based Preferences

First: Priority Workers: 28.6% of the worldwide employment-based preference level, plus any numbers not required for fourth and fifth preferences.

Second: Members of the Professions Holding Advanced Degrees or Persons of Exceptional Ability: 28.6% of the worldwide employment-based preference level, plus any numbers not required by first preference.



Third: Skilled Workers, Professionals, and Other Workers: 28.6% of the worldwide level, plus any numbers not required by first and second preferences, of which not more than 10,000 may be provided to "*Other Workers".

Fourth: Certain Special Immigrants: 7.1% of the worldwide level.

Fifth: Employment Creation: 7.1% of the worldwide level, of which 32% are reserved as follows: 20% reserved for qualified immigrants who invest in a rural area; 10% reserved for qualified immigrants who invest in a high unemployment area; and 2% reserved for qualified immigrants who invest in infrastructure projects. The remaining 68% are unreserved and are allotted for all other qualified immigrants.

A. Final Action Dates for Employment-Based Preference Cases

On the chart below, the listing of a date for any class indicates that the class is oversubscribed (see paragraph 1); "C" means current, i.e., numbers are authorized for issuance to all qualified applicants; and "U" means unauthorized, i.e., numbers are not authorized for issuance. (NOTE: Numbers are authorized for issuance only for applicants whose priority date is **earlier** than the final action date listed below.)

Employment-Based	All Chargeability Areas Except Those Listed	CHINA-mainland born	INDIA	MEXICO	PHILIPPINES
1st	C	22DEC22	15FEB22	C	C
2nd	01DEC23	01APR21	01APR13	01DEC23	01DEC23
3rd	01APR23	01MAR21	22AUG13	01APR23	01APR23
Other Workers	15JUL21	01DEC17	22AUG13	15JUL21	15JUL21
4th	01JUL20	01JUL20	01JUL20	01JUL20	01JUL20
Certain Religious Workers	U	U	U	U	U
5th Unreserved <i>(including C5, T5, I5, R5, NU, RU)</i>	C	08DEC15	01FEB21	C	C
5th Set Aside: Rural (20%) <i>(including NR, RR)</i>	C	C	C	C	C
5th Set Aside: High Unemployment (10%) <i>(including NH, RH)</i>	C	C	C	C	C



5th Set Aside: Infrastructure (2%) (including RI)	C	C	C	C	C
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*Employment Third Preference Other Workers Category: Section 203(e) of the Nicaraguan and Central American Relief Act (NACARA) passed by Congress in November 1997, as amended by Section 1(e) of Pub. L. 105-139, provides that once the Employment Third Preference Other Worker (EW) cut-off date has reached the priority date of the latest EW petition approved prior to November 19, 1997, the 10,000 EW numbers available for a fiscal year are to be reduced by up to 5,000 annually beginning in the following fiscal year. This reduction is to be made for as long as necessary to offset adjustments under the NACARA program. Since the EW final action date reached November 19, 1997 during Fiscal Year 2001, the reduction in the EW annual limit to 5,000 began in Fiscal Year 2002. For Fiscal Year 2026 this reduction will be limited to approximately 150.

B. Dates for Filing of Employment-Based Visa Applications

The chart below reflects dates for filing visa applications within a timeframe justifying immediate action in the application process. Applicants for immigrant visas who have a priority date earlier than the application date in the chart may assemble and submit required documents to the Department of State’s National Visa Center, following receipt of notification from the National Visa Center containing detailed instructions. The application date for an oversubscribed category is the priority date of the first applicant who cannot submit documentation to the National Visa Center for an immigrant visa. If a category is designated “current,” all applicants in the relevant category may file, regardless of priority date.

The “C” listing indicates that the category is current, and that applications may be filed regardless of the applicant’s priority date. The listing of a date for any category indicates that only applicants with a priority date which is **earlier** than the listed date may file their application.

Visit www.uscis.gov/visabulletininfo for information on whether USCIS has determined that this chart can be used (in lieu of the chart in paragraph 5.A.) this month for filing applications for adjustment of status with USCIS.

Employment-Based	All Chargeability Areas Except Those Listed	CHINA-mainland born	INDIA	MEXICO	PHILIPPINES
1st	C	15MAY23	15APR23	C	C
2nd	15JUL24	01DEC21	01DEC13	15JUL24	15JUL24
3rd	01JUL23	01JAN22	15AUG14	01JUL23	01JUL23
Other Workers	01DEC21	01OCT18	15AUG14	01DEC21	01DEC21
4th	15FEB21	15FEB21	15FEB21	15FEB21	15FEB21



Certain Religious Workers	U	U	U	U	U
5th Unreserved <i>(including C5, T5, I5, R5, NU, RU)</i>	C	01JUL16	01APR22	C	C
5th Set Aside: Rural (20%) <i>(including NR, RR)</i>	C	C	C	C	C
5th Set Aside: High Unemployment (10%) <i>(including NH, RH)</i>	C	C	C	C	C
5th Set Aside: Infrastructure (2%) <i>(including RI)</i>	C	C	C	C	C

B. Diversity Immigrant (DV) Category for the Month of November

Section 203(c) of the INA provides up to 55,000 immigrant visas each fiscal year to permit additional immigration opportunities for persons from countries with low admissions during the previous five years. The NACARA stipulates that beginning with DV-99, and for as long as necessary, up to 5,000 of the 55,000 annually allocated diversity visas will be made available for use under the NACARA program. Visa numbers made available to NACARA applicants in FY 2025 will result in reduction of the DV-2026 annual limit to approximately 54,850. Section 5104 of the National Defense Authorization Act (NDAA) for Fiscal Year 2024 amended the NACARA's provisions on the DV program such that the number of visas made available under the NDAA each fiscal year will be deducted from the 55,000 DVs annually allocated. These amendments will further reduce the DV-2026 annual limit to approximately 52,000. DVs are divided among six geographic regions. No one country can receive more than seven percent of the available diversity visas in any one year.

For November, immigrant numbers in the DV category are available to qualified DV-2026 applicants chargeable to all regions/eligible countries as follows. When an allocation cut-off number is shown, visas are available only for applicants with DV regional lottery rank numbers BELOW the specified allocation cut-off number:

Region	All DV Chargeability Areas Except Those Listed Separately	
AFRICA	17,500	Except: Algeria 14,500 Egypt 16,000
ASIA	10,000	Except: Nepal 6,000



EUROPE	7,750	
NORTH AMERICA (BAHAMAS)	20	
OCEANIA	1,100	
SOUTH AMERICA, and the CARIBBEAN	1,850	

Entitlement to immigrant status in the DV category lasts only through the end of the fiscal (visa) year for which the applicant is selected in the lottery. The year of entitlement for all applicants registered for the DV-2026 program ends as of September 30, 2026. DVs may not be issued to DV-2026 applicants after that date. Similarly, spouses and children accompanying or following to join DV-2026 principals are only entitled to derivative DV status until September 30, 2026. DV availability through the end of FY-2026 cannot be taken for granted. Numbers could be exhausted prior to September 30.

C. Diversity (DV) Immigrant Category Rank Cut-Offs Which Will Apply in December

For December, immigrant numbers in the DV category are available to qualified DV-2026 applicants chargeable to all regions/eligible countries as follows. When an allocation cut-off number is shown, visas are available only for applicants with DV regional lottery rank numbers BELOW the specified allocation cut-off number:

Region	All DV Chargeability Areas Except Those Listed Separately	
AFRICA	17,500	Except: Algeria 17,250 Egypt 16,000
ASIA	10,000	Except: Nepal 6,000
EUROPE	7,750	
NORTH AMERICA (BAHAMAS)	20	
OCEANIA	1,100	
SOUTH AMERICA, and the CARIBBEAN	1,850	

D. Expiration of the Employment Fourth Preference Certain Religious Workers (SR) Category

H.R. 1968, signed on March 15, 2025, extended the Employment Fourth Preference Certain Religious Workers (SR) category until September 30, 2025. No SR visas may be issued overseas, or final action taken on adjustment of status cases, after midnight September 29, 2025.



The final action date for this category has been listed as “Unavailable” for November. In the event there is legislative action extending the category, it is likely it will become available effective immediately. If extended, the category will be subject to the same final action dates as the other Employment Fourth Preference categories per applicable foreign state of chargeability.

E. Diversity Visa Lottery 2026 (DV-2026 Results)

The Kentucky Consular Center in Williamsburg, Kentucky has registered and notified the selectees who are eligible to participate in the DV-2026 Diversity Visa (DV) program. Random selection of DV participants was conducted under the terms of section 203(c) of the Immigration and Nationality Act, which makes up to *55,000 permanent resident visas available annually to persons from countries with low rates of immigration to the United States. Approximately 129,516 prospective applicants (i.e., selectees and their spouses and children) have been registered, can confirm their selection, and may be eligible to make an application for an immigrant visa. Since selection is random and blind to the number of family members who might immigrate with the selectee, and it is likely that some of the selectees will not complete their cases or will be found ineligible for a visa, this larger figure should ensure that all DV-2026 numbers can be used during fiscal year 2026 (FY26: October 1, 2025, until September 30, 2026).

Entrants registered for the DV-2026 program were selected at random from 20,822,624 qualified entries received during the 37-day application period that ran from noon, Eastern Daylight Time on Wednesday, October 2, 2024, until noon, Eastern Standard Time on Thursday, November 7, 2024. The visas will be apportioned among the six geographic regions to ensure a maximum of seven percent are issued to persons chargeable to any single country. During the visa interview, principal applicants must provide proof of a high school education or its equivalent, or two years of work experience in an occupation that requires at least two years of training or experience within the past five years. Those selected will need to act on their immigrant visa applications quickly. Applicants should follow the instructions in their notification letter and must fully complete all required steps.

Selectees who are physically present with legal status in the United States may apply to adjust their status by first contacting the U.S. Citizenship and Immigration Services for information on the requirements and procedures. Once the total *55,000 visa numbers have been used, the program for fiscal year 2026 will end. Selectees who do not receive visas or status by September 30, 2026, will derive no further benefit from their DV-2026 registration. Similarly, spouses and children accompanying or following to join DV-2026 principal applicants are only entitled to derivative DV status until September 30, 2026.

Dates for the DV-2027 program registration period will be widely publicized in the coming months. Those interested in entering the DV-2027 program should check the Department of State’s Diversity Visa web page in the coming months.

*The Nicaraguan and Central American Relief Act (NACARA) passed by Congress in November 1997 stipulated that up to 5,000 of the 55,000 annually allocated diversity visas be made available for use under the NACARA program. This will result in reduction of the DV-2026 annual limit to approximately 54,850. Additionally, Section 5104 of the National Defense Authorization Act (NDAA)



for Fiscal Year 2024 amended the NACARA's provisions on the Diversity Visa program such that the number of visas made available under the NDAA will also be deducted from the 55,000 DVs annually allocated. This will result in an additional reduction of the DV-2026 annual limit to approximately 51,850.

The following is the statistical breakdown by foreign state of chargeability of prospective applicants (i.e., selectees and their spouses and children) who have been registered for the DV-2026 program:

AFRICA		
ALGERIA 5,457	ESWATINI 3	MOZAMBIQUE 4
ANGOLA 763	ETHIOPIA 3,287	NAMIBIA 3
BENIN 1,064	GABON 62	NIGER 109
BOTSWANA 7	GAMBIA, THE 198	RWANDA 1,252
BURKINA FASO 252	GHANA 1,642	SENEGAL 478
BURUNDI 1,616	GUINEA 1,051	SIERRA LEONE 639
CABO VERDE 35	GUINEA-BISSAU 10	SOMALIA 1,554
CAMEROON 3,533	KENYA 3,949	SOUTH AFRICA 187
CENTRAL AFRICAN REPUBLIC 19	LESOTHO 6	SOUTH SUDAN 72
CHAD 482	LIBERIA 1,593	SUDAN 5,226
COMOROS 12	LIBYA 276	TANZANIA 404
CONGO, DEMOCRATIC REPUBLIC OF THE 2,210	MADAGASCAR 48	TOGO 2,473
CONGO, REPUBLIC OF THE 448	MALAWI 159	TUNISIA 202
COTE D'IVOIRE 926	MALI 268	UGANDA 1,513
DJIBOUTI 204	MAURITANIA 261	ZAMBIA 236
EGYPT 5,527	MAURITIUS 2	ZIMBABWE 327
EQUATORIAL GUINEA 12	MOROCCO 3,670	
ERITREA 206	Western Sahara 2	
ASIA		
AFGHANISTAN 4,200	JORDAN 1,092	SINGAPORE 6
BAHRAIN 18	KUWAIT 101	SRI LANKA 1,028
BHUTAN 278	LAOS 68	SYRIA 624
BURMA 1,540	LEBANON 141	TAIWAN 247
CAMBODIA 811	MALAYSIA 17	THAILAND 360
INDONESIA 385	MONGOLIA 227	TIMOR-LESTE 1
IRAN 4,137	NEPAL 3,933	UNITED ARAB EMIRATES 154
IRAQ 616	OMAN 11	YEMEN 2,449
ISRAEL 153	QATAR 66	
JAPAN 141	SAUDI ARABIA 577	



EUROPE		
ALBANIA 1,590	GERMANY 420	POLAND 343
ARMENIA 2,639	GREECE 58	PORTUGAL 40
AUSTRIA 35	HUNGARY 121	Macau 5
AZERBAIJAN 1,817	IRELAND 30	ROMANIA 161
BELARUS 1,545	ITALY 267	RUSSIA 5,510
BELGIUM 26	KAZAKHSTAN 2,723	SERBIA 324
BOSNIA AND HERZEGOVINA 51	KOSOVO 172	SLOVAKIA 26
BULGARIA 142	KYRGYZSTAN 3,324	SLOVENIA 6
CROATIA 14	LATVIA 53	SPAIN 84
CYPRUS 8	LITHUANIA 79	SWEDEN 34
CZECH REPUBLIC 44	MOLDOVA 1,208	SWITZERLAND 22
DENMARK 8	MONTENEGRO 57	TAJIKISTAN 3,708
ESTONIA 17	NETHERLANDS 24	TURKEY 3,191
FINLAND 20	Aruba 4	TURKMENISTAN 2,542
FRANCE 309	NORTH MACEDONIA 165	UKRAINE 5,283
French Polynesia 1	NORTHERN IRELAND 10	UNITED KINGDOM 1,303
New Caledonia 4	NORWAY 6	UZBEKISTAN 3,754
GEORGIA 1,406		
NORTH AMERICA		
BAHAMAS, THE 23		
OCEANIA		
AUSTRALIA 599	MICRONESIA 1	SAMOA 14
Christmas Island 1	NAURU 8	SOLOMON ISLANDS 4
Cocos (Keeling) Islands 55	NEW ZEALAND 229	TONGA 100
COOK ISLANDS 24	Tokelau 4	VANUATU 13
Fiji 2,094	PAPUA NEW GUINEA 14	
KIRIBATI 15	REPUBLIC OF PALAU 3	
SOUTH AMERICA		
ANTIGUA AND BARBUDA 2	ECUADOR 1,270	PERU 1,596
ARGENTINA 124	GRENADA 5	SAINT KITTS AND NEVIS 11
BARBADOS 3	GUATEMALA 367	SAINT LUCIA 9
BELIZE 2	GUYANA 24	SAINT VINCENT AND THE GRENADINES 8
BOLIVIA 269	NICARAGUA 167	SURINAME 8
CHILE 83	PANAMA 36	TRINIDAD AND TOBAGO 139



COSTA RICA 99	PARAGUAY 19	URUGUAY 13
DOMINICA 8		

Natives of the following countries were not eligible to participate in DV-2026: Bangladesh, Brazil, Canada, China (including Hong Kong SAR), Colombia, Cuba, Dominican Republic, El Salvador, Haiti, Honduras, India, Jamaica, Mexico, Nigeria, Pakistan, Philippines, South Korea, Venezuela, and Vietnam.

F. U.S. Government Employee Special Immigrant Visas (SIVs)

The National Defense Authorization Act (NDAA) for Fiscal Year 2024, signed into law on December 22, 2023, may affect certain current and former employees of the U.S. Government abroad, as well as certain surviving spouses and children of deceased employees of the U.S. government abroad, applying for SIVs or adjustment of status, as described in section 101(a)(27)(D) of the INA. This does not affect certain Iraqis and Afghans applying for SQ and SI SIVs. Applicants should contact the consular section at which they filed their Form DS-1884 for further information on the impact of that law on their case.

For the latest information on visa processing at U.S. embassies and consulates, please visit the Bureau of Consular Affairs website at travel.state.gov.

Department of State Publication 9514
CA/VO: October 1, 2025

EXHIBIT M

THE UNIVERSITY OF CHICAGO PRESS

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EXHIBIT N

Official Website of the Department of Homeland Security



U.S. Immigration and Customs Enforcement

Report Crime

Home Who We Are **What We Do** Newsroom Information Library

Search Results: 1

CRISTIAN AMAYA-QUINTEROS

Country of Birth : El Salvador

A-Number: 

Status : In ICE Custody

State: CA

Current Detention Facility: CALIFORNIA CITY CORRECTIONS CENTER

** Click on the Detention Facility name to obtain facility contact information*

[BACK TO SEARCH >](#)



ATTORNEY VERIFICATION

1
2 I, Mario Salgado, Esq, authorized representative of Plaintiff, affirm under penalty of perjury
3 that: The statement of facts contained in the Complaint are true to my knowledge based on the
4 record before the USCIS and the Department of Homeland Security, except as to those matters
5 that are stated in it on my information and belief, and as to those matters, I believe them to be
6 true.
7

8
9 Date: November 29, 2025

Respectfully Submitted,

10
11 /s/ Mario Salgado
12 Mario Salgado, Esq.
13 **SALGADO & PERALTA, P.A.**
14 **605 Market Street Suite 1111**
15 **San Francisco, CA 94105**
16 **Tel: 415.401.8699**
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CERTIFICATE OF SERVICE

I, Mario Salgado, am over the age of 18 years and maintain a business address located at 605 Market Street Suite 1111 in San Francisco, California 94105. I mailed the **VERIFIED PETITION FOR WRIT OF HABEAS CORPUS AND DECLARATORY AND INJUNCTIVE RELIEF FOR AN ORDER TO SHOW CAUSE** to:

1. CORECIVIC, INC. Attn: Amanda Garcia, Registered Corporate Agent Authorized Employee, located at 330 N. Brand Blvd, Glendale, CA 94103
2. Kristi NOEM, Secretary of the Department of Homeland Security, Office of the General Counsel; U.S. Department of Homeland Security; 245 Murray Lane, SW; Mail Stop 0485; Washington, D.C. 20258-0485.
3. Pamela BONDI, U.S. Attorney General, U.S. Department of Justice; 950 Pennsylvania Avenue, NW; Washington, D.C. 20530-0001
4. Civil Process Clerk & United States Attorney's Office for the Eastern District of California; 2500 Tulare Street, Suite 4401, Fresno, CA 93721.
5. Moises BECERRA, Field Office of Immigration and Customs Enforcement, Enforcement and Removal Operations, Department of Homeland Security, Office of the General Counsel; U.S. Department of Homeland Security; 245 Murray Lane, SW; Mail Stop 0485; Washington, D.C. 20258-0485.

Via certified mail with the United States Postal Service on November 29, 2025.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

Date: November 29, 2025

/s/ Mario Salgado
Mario Salgado, Esq.