


I, Benjamin M Crouse, counsel of record for Cesar Cano Ortega in immigration court declare under penalty of perjury as follows:

1. I was retained as counsel of record for Petitioner Cesar Cano Ortega, who is in the physical custody of Respondents at the Dodge County Jail in Juneau, Wisconsin.
2. After being retained by Mr. Cano Ortega on December 4, 2025, I obtained documents related to Mr. Cano Ortega that were in possession by the Department of Homeland Security (DHS).
3. First, I obtained what DHS filed with the Chicago Immigration Court. I obtained these documents from the Immigration Court's electronic ECAS filing system after entering my appearance in the Petitioner's immigration case. I received a Notice to Appear in File No. A  entitled "In the Matter of Respondent Cesar Cano Ortega." The document bears a filing stamp at the top of every page as well as an annotation on every page indicating the response to allegations, and the designation of a country of removal. At the end of this document is Mr. Cano Ortega's arrest warrant, which was titled entitled "U.S. Department of Homeland Security Warrant for Arrest of Alien," which was directed to "Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrant of arrest for immigration violations" and indicated that an Authorized Immigration Officer has determined that "there is probable cause to believe that Mr. Cano Ortega, is removable from the United States." A true and correct copy of which is attached hereto as Exhibit I.
4. Next, on December 4, 2025, I also downloaded a copy of Mr. Cano Ortega's electronically filed I-589 Application for Asylum and Withholding of Removal that had been filed affirmatively with USCIS, and forwarded to the Immigration Court, by

the Department of Homeland Security according to the initial cover letter on that document. A true and correct copy of which is attached as Exhibit 2.

5. On December 4, 2025, I received the order from the Immigration Court denying bond to Mr. Cano Ortega via email from his prior counsel William Leon Torres. The first document” A true and correct copy of that Notice is attached hereto as Exhibit 3.
6. Petitioner is scheduled to appear remotely in the Chicago Immigration Court on December 23, 2025. The Chicago Immigration Court has jurisdiction over detainees at the Dodge County Jail in Juneau, Wisconsin.

I declare under penalty of perjury that all statements above are true and correct to the best of my knowledge.

Executed on December 5, 2025.

*s/Benjamin Crouse*

Benjamin M Crouse