

# CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p><b>I. (a) PLAINTIFFS</b> Kwan Ho Wu AKA Kuanhe Wu</p> <p><b>(b) County of Residence of First Listed Plaintiff</b> _____ <i>(EXCEPT IN U.S. PLAINTIFF CASES)</i></p> <p><b>(c) Attorneys (Firm Name, Address, and Telephone Number)</b> Luis F. Hess, PLLC, Michael C. Urbanowich, PO BOX 7828, Spring, TX 77387, Tel: 281-205-8540</p>	<p><b>DEFENDANTS</b> Ray Thompson, Warden of JCPC; Bret Bradford, ICE; Kristi Noem, DHS; and Pam Bondi, Attorney General of U.S. County of Residence of First Listed Defendant _____ <i>(IN U.S. PLAINTIFF CASES ONLY)</i></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known)</p>
---	--

<p><b>II. BASIS OF JURISDICTION</b> <i>(Place an "X" in One Box Only)</i></p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question <i>(U.S. Government Not a Party)</i></p> <p><input type="checkbox"/> 4 Diversity <i>(Indicate Citizenship of Parties in Item III)</i></p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> <i>(Place an "X" in One Box for Plaintiff and One Box for Defendant)</i></p> <p><i>(For Diversity Cases Only)</i></p> <table style="width: 100%;"> <tr> <td style="width: 25%;">Citizen of This State</td> <td style="width: 5%;">PTF</td> <td style="width: 5%;">DEF</td> <td style="width: 25%;">Incorporated or Principal Place of Business In This State</td> <td style="width: 5%;">PTF</td> <td style="width: 5%;">DEF</td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Citizen of Another State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Incorporated and Principal Place of Business In Another State</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/></td> <td>Foreign Nation</td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>	Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business In This State	PTF	DEF	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Citizen of Another State	<input type="checkbox"/>	<input type="checkbox"/>	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Citizen or Subject of a Foreign Country	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Citizen of This State	PTF	DEF	Incorporated or Principal Place of Business In This State	PTF	DEF																																
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																																
Citizen of Another State	<input type="checkbox"/>	<input type="checkbox"/>	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/>	<input type="checkbox"/>																																
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																																
Citizen or Subject of a Foreign Country	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Foreign Nation	<input type="checkbox"/>	<input type="checkbox"/>																																
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>																																

**IV. NATURE OF SUIT** *(Place an "X" in One Box Only)* Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSDI Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes

**V. ORIGIN** *(Place an "X" in One Box Only)*

1 Original Proceeding     2 Removed from State Court     3 Remanded from Appellate Court     4 Reinstated or Reopened     5 Transferred from Another District *(specify)*     6 Multidistrict Litigation - Transfer     8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:  
28 U.S.C. § 2241

Brief description of cause:  
Petition for Writ of Habeas Corpus challenging unlawful detention.

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.    DEMAND \$ \_\_\_\_\_    CHECK YES only if demanded in complaint:  
JURY DEMAND:  Yes     No

**VIII. RELATED CASE(S) IF ANY** *(See instructions):*    JUDGE \_\_\_\_\_    DOCKET NUMBER \_\_\_\_\_

DATE: 12/09/2025    SIGNATURE OF ATTORNEY OF RECORD: 

FOR OFFICE USE ONLY

RECEIPT # \_\_\_\_\_    AMOUNT \_\_\_\_\_    APPLYING IFP \_\_\_\_\_    JUDGE \_\_\_\_\_    MAG. JUDGE \_\_\_\_\_

**Michael C. Urbanowich**  
**Attorney for Petitioner**  
**State Bar No. 24088563**  
Luis F. Hess, PLLC  
PO BOX 7828  
Spring, TX 77387  
Phone: 281-205-8540  
Fax: 832-200-3518

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN TEXAS DISTRICT  
HOUSTON DIVISION**

	§	
<b>Kwan Ho Wu AKA Kuanhe Wu</b>	§	
<b><u>Petitioner</u></b>	§	
	§	
V.	§	Case No. _____
<b>Ray Thompson</b> , in his official capacity	§	
as Warden of the Joe Corley Processing	§	<b>PETITION FOR WRIT OF HABEAS</b>
Center	§	<b>CORPUS PERSUANT TO</b>
	§	<b>28 U.S.C. § 2241</b>
<b>Bret Bradford</b> , in his official capacity as	§	
Field Director of ICE Enforcement and	§	
Removal Operations at the Houston Field	§	
Office	§	
	§	
<b>Kristi Noem</b> , in her official capacity as	§	
Secretary of Homeland Security	§	
	§	
<b>Pam Bondi</b> , in her official capacity as	§	
Attorney General of the United States.	§	
	§	
	§	
<b><u>Respondents</u></b>	§	
	§	

**PETITION FOR WRIT OF HABEAS CORPUS PERSUANT TO 28 U.S.C. § 2241  
AND COMPLAINT FOR INJUNCTIVE RELIEF**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

The Petitioner, Kwan Ho Wu (hereinafter "Petitioner"), by and through undersigned Counsel, respectfully petitions this Court for a Writ of Habeas Corpus pursuant to 28. U.S.C. § 2241 and, in support thereof, states the following:

**I. PARTIES AND CUSTODY**

1. The Petitioner has been under ICE Custody since June 24, 2025, and currently remains in ICE Custody at the Joe Corley Processing Center. Therefore, the Petitioner has been detained and under ICE Custody for more than 5 months.
2. Respondent Ray Thompson in his official capacity as Warden of the Joe Corley Processing Center, currently holds Petitioner in custody as unlawfully ordered by the Houston Field office of ICE Enforcement and Removal Operations. The Warden's detention facility is located within this Honorable Court's judicial district.
3. Respondent Bret Bradford, in his official capacity as Director of the Houston Field Office of ICE Enforcement and Removal Operations, has refused to effect Petitioner's release from the unlawful custody of the Warden of the Joe Corley Processing Center.
4. Respondent Kristi Noem, in her official capacity as Secretary of the United States Department of Homeland Security, has refused to exercise her authority to oversee her department's ICE Enforcement and Removal Operations and thereby effect

Petitioner's release from the unlawful custody of the Warden of the Joe Corley Processing Center.

5. Respondent Pam Bondi, in her official capacity as Attorney General of the United States, has refused to exercise her authority to oversee her department's ICE Enforcement and Removal Operations and thereby effect Petitioner's release from the unlawful custody of the Warden of the Joe Corley Processing Center.

## **II. JURISDICTION AND VENUE**

6. This Honorable Court has subject matter jurisdiction under 28 U.S.C. § 2241 to issue writs of habeas corpus when the Petitioner is in custody in violation of the Constitution or laws of the United States.
7. Venue is proper in this District because Petitioner is detained within this District.

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

8. Petitioner has exhausted his administrative remedies to the extent required by law.
9. Petitioner has fully cooperated with Respondents and has not delayed or obstructed his detention.
10. Petitioner's only remedy is by way of this judicial action.

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

11. Petitioner is a 53-year-old citizen of the People's Republic of China whose first and only entry to the United States of America was September 07, 1992, when he was inspected and paroled into the country. (*See Tab A*; Petitioner's Birth Certificate and Petitioner's I-94).
12. Petitioner has resided continuously for more than 33 years in the United States. Petitioner is married and is the father to four United States Citizen children and has elderly Lawful Permanent Residents parents, all of whom depend on him emotionally, financially and medically. (*See Tab B*, Children's Birth Certificates and Parent's LPR Cards). Petitioner has no remaining family or any kind of friends remaining in China.
13. Petitioner's eldest daughter filed an I-130 Petition for Alien Relative on his behalf, with said petition being approved on May 15, 2019. On December 13, 2023, Petitioner applied for an I-485 Application to Register Permanent Residence or Adjust Status and for an I-601 Application for Waiver of Grounds of Inadmissibility. (*See Tab C*, I-130 Approval Notice, I-485 Receipt Notice, I-601 Receipt Notice).
14. Petitioner was placed in exclusion proceedings after his parole in 1992. In 1994, an Immigration Judge found that Petitioner had not made the requisite showing to warrant Asylum or Withholding of Deportation and ordered his exclusion. Petitioner filed an appeal with the BIA that was dismissed in 2000. In 2007, Petitioner filed a Motion to Reopen Exclusion Proceedings based on ineffective assistance of counsel. The Board of Immigration Appeals (BIA) denied this motion. In 2010, Petitioner filed a second Motion to Reopen, alleging changed conditions in the People's Republic of China. The BIA denied this motion on November 16, 2010, and Petitioner timely filed

a petition for review. **Petitioner received an Order of Supervision on February 16, 2011.** On December 16, 2019, Petitioner filed a Third Motion to Reopen which sought reconsideration of the denial of his second Motion to Reopen. The BIA denied the Motion on March 2, 2011. Petitioner timely petitioned for review of this denial and the case was consolidated in two Appeals. Petitioner has attended his ICE Check-ins from 2011 until 2025. On August 25, 2025, Petitioner filed a Motion to Reopen to the BIA that remains pending at this moment. (*See Tab F*, Petitioner's Filing Receipt at the BIA and Compliance with Order of Supervision).

15. Petitioner was scheduled to appear for his interview related to his I-485 on June 24, 2025, at the United States Citizenship and Immigration Services (USCIS) office in New York City. When Petitioner attended this interview, he was apprehended by ICE agents and placed in detention, where he remains to this day.

16. Petitioner has remained under ICE Custody for more than 5 months. ICE was supposed to review Petitioner Custody Status on September 25, 2025, and even requested additional evidence in support of his release. But to this date they have not issued an official response nor released Petitioner from the Joe Corley Processing Center. (*See Tab H*, ICE Request to Petitioner for Additional Evidence for Custody Review).

17. Petitioner's parents both suffer from serious medical conditions that include Diabetes, Hypertension, Heart diseases and Osteoarthritis. They both depend on Petitioner to be able to continue their medical treatments. With Petitioner being the sole provider and caregiver for them. (*See Tab D*, Parents' Medical Records).

18. In the more than 30 years since his first arrival in this country Petitioner has been someone who believed in hard work and in the concept of the American Dream. He arrived with nothing to his name and with his hard work he has been able to build a business from the ground up. With the years Petitioner has made significant investments in this country so he can grow his business. Now after all this hard work Petitioner is the proud owner of multiple business ventures that give jobs to more than 250 people across the United States. (*See Tab E, Petitioner's Business Records*).
19. Petitioner has been law-abiding during his residence in the United States. His only incident occurred on November 8, 2006, in New York, where he was charged under several provisions of the Vehicle and Traffic Law. Ultimately, he pled guilty to VTL 1192.1 (Driving While Ability Impaired), which is a traffic infraction, not a crime. He paid the required fines, successfully completed the mandated driver program, and has never reoffended in nearly twenty years. *See Tab G. Petitioner Criminal Record / Driving While Ability Impaired Case File*.
20. ICE and DHS have not demonstrated that Petitioner is a Danger to the Community or a Flight Risk. Petitioner has been a consistent taxpayer and lawfully resided in the United States of America for over 3 decades. He is a respected entrepreneur who owns multiple business that provide employment for more than 250 individuals across the United States.
21. Petitioner's longstanding residence, deep family and community ties, substantial economic investment and willingness to comply with Government Authorities supports the determination that Petitioner is not a flight risk and should not continue in prolonged detention that his clearly becoming Unreasonable and Unconstitutional.

V. LEGAL FRAMEWORK FOR RELIEF SOUGHT

22. Under U.S. Code 28 § 2241, writs of habeas corpus may be granted by the district courts on behalf of a prisoner in several instances, including when they are (1) "in custody under or by the authority of the United States or is committed for trial before some court thereof," and (3) "in custody in violation of the Constitution or laws and treaties of the United States[.]"
23. Courts have consistently recognized "habeas corpus as an appropriate vehicle through which noncitizens may challenge the fact of their civil immigration detention." *Vazquez Barrera v. Wolf*, 455 F. Supp. 3d 330, 336 (S.D. Tex. 2020) (citing *Zadvydas v. Davis*, 533 U.S. at 688 (ruling on merits of habeas petition challenging validity of indefinite mandatory detention)).
24. Petitioner's detention is approaching and will soon surpass the *Zadvydas* six-month constitutional benchmark. Under *Zadvydas*, once detention reaches this duration, the burden shifts to the Government to demonstrate that removal is significantly likely in the reasonably foreseeable future. Here, the Government cannot make such a showing because:
- a. Petitioner has a pending BIA Motion to Reopen directly attacking issues in his case.
  - b. Petitioner has pending I-485 and I-601 applications that may materially affect the enforceability of any removal order.

- c. The Government has not provided any concrete evidence of a viable, scheduled, or imminent removal.
- d. The Government has not held any individualized hearing to determine if Petitioner is a flight risk or poses a threat to the community, a necessary step before they detained him.

Thus, the initiation of this detention, and the continued detention without a realistic prospect of removal, is unconstitutional under *Zadvydas* and *Matthews v. Eldridge*, 424 U.S. 319 (1976).

## VI. CLAIMS FOR RELIEF

### COUNT ONE:

#### **RESPONDENTS HAVE UNLAWFULLY DETAINED PETITIONERS IN VIOLATION OF CONSTITUTIONAL DUE PROCESS.**

- 25. Petitioner alleges and incorporates by reference paragraphs 1 through 24 above.
- 26. As stated above, Petitioner has demonstrated no conduct indicating that he is a threat to the United States or otherwise considered to be a flight risk.
- 27. Therefore, Petitioner merits immediate release because he has a pending Motion to Reopen with the BIA, was previously granted his freedom after a determination that he was not a flight risk or a danger to the community, no further hearing has been held to determine if he is now a flight risk or a danger to the community, and the

government cannot articulate any meaningful reason why he should continue to remain in detention.

**COUNT TWO:**

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

28. Petitioner alleges and incorporates by reference paragraphs 1 through 27 above.
29. Petitioner's detention violates his right to substantive and procedural due process guaranteed by the Fifth Amendment to the U.S. Constitution.
30. Petitioner is unlawfully in custody pursuant to INA § 241(a)(6), 8 U.S.C. § 1231(a)(6) (2018) ("Section 241"). Under *Zadvydas*, that provision prohibits the indefinite detention of noncitizens who (i) cannot be repatriated in the reasonably foreseeable future, and (ii) pose no threat to the community. Any such detention is unconstitutional. *See Zadvydas*, 533 U.S. at 689, ("In our view, the statute [Section 241], read in light of the Constitution's demands, limits an alien's post-removal-period detention to a period reasonably necessary to bring about that alien's removal from the United States. It does not permit indefinite detention.").
31. The Fifth Amendment's Due Process Clause prohibits the government from detaining individuals without legal authority.
32. Moreover, **continued detention without an individualized determination violates due process** under *Zadvydas v. Davis*, 533 U.S. 678 (2001).

33. Petitioner has been detained since June 24, 2025 **without any individualized assessment of flight risk or dangerousness.**
34. **Petitioner poses no flight risk or danger to the community** or any other conduct that could pose a danger to the United States.
35. ICE was supposed to review Petitioner Custody Status on September 25, 2025, and even requested additional evidence in support of his release. But to this date they have not issued an official response.
36. Petitioner's forced separation from his parents is causing immediate and irreparable harm to his parents, who are Lawful Permanent Residents.
37. Moreover, this continuing harm and separation caused by Petitioner's detention has resulted in significant suffering for his parents, one of whom was recently hospitalized. Petitioner is their primary caregiver.
38. In addition, Petitioner has four U.S. citizen children, an approved Form I-130, a pending Form I-485, and owns a successful business in the United States that generates hundreds of jobs.
39. Continued detention under these circumstances is both cruel and arbitrary.
40. Petitioner's continued detention lacks statutory authority and violates his right to substantive and procedural due process under the Constitution. Therefore, he should be immediately released from custody.

**VII. PRAYER FOR RELIEF**

Wherefore, Petitioner respectfully requests that this Court issue a Writ of Habeas Corpus directing Respondents to show cause why Petitioner should not be released from custody, and to order Petitioner's immediate release from custody. In the alternative, Petitioner respectfully requests that this Court order an individualized Bond Hearing before an Immigration Judge with the burden on the government to demonstrate by clear and convincing evidence that detention is necessary. Petitioner requests that this Court grant such other relief as this Court deems just and proper.

Respectfully Submitted.



Michael Urbanowich  
**Attorney for Petitioner**  
**State Bar No. 24088563**  
Luis F. Hess, PLLC  
PO BOX 7828  
Spring, TX 77387  
Phone: 281-205-8540  
murbanowichhess@gmail.com

## INDEX

<b>TAB</b>	<b>EVIDENCE</b>	<b>PAGE</b>
A	Petitioner's Birth Certificate and Petitioner's I-94	14-16
B	Children's Birth Certificates and Parent's LPR Cards	18-23
C	I-130 Approval Notice, I-485 Receipt Notice, I-601 Receipt Notice	25-29
D	Parents' Medical Records	31-45
E	Petitioner's Business Records	47-70
F	Petitioner's Filing Receipt at the BIA and Compliance with Order of Supervision	72-79
G	Petitioner Criminal Record / Driving While Ability Impaired Case File	81-82
H	ICE Request to Petitioner for Additional Evidence for Custody Review	84-89
I	Petitioner Verification and Certificate of Service	91-93

# TAB F



Executive Office for Immigration Review

Board of Immigration Appeals  
Office of the Clerk

5107 Leesburg Pike, Suite 2000  
Falls Church, Virginia 22041

Rahman, Meer Md. Mizanur  
Law Office of Meer M M Rahman  
305 Broadway  
Suite 610  
New York, NY 10007

DHS/ICE Office of Chief Counsel - NEW  
970 Broad Street, Room 1300  
Newark, NJ 07102

Name: WU, KWAN HO



Type of Proceeding: Exclusion

Date of this notice: 8/26/2025

Type of Motion: MTR BIA-REO

Filed by: Alien

**FILING RECEIPT FOR MOTION**

The Board of Immigration Appeals (Board or BIA) acknowledges receipt of your motion and fee or fee waiver request (where applicable) on 8/25/2025 in the above-referenced case.

**PLEASE NOTE:**

Filing a motion with the Board DOES NOT automatically stop the Department of Homeland Security from executing an order of removal or deportation. If you are in DHS detention and are about to be deported, you may request the Board to stay your deportation on an emergency basis. For more information, call BIATIPS at (703) 605-1007.

In all future correspondence or filings with the Board, please list the name and alien registration number ("A" number) of the case (as indicated above), as well as all of the names and "A" numbers for each family member who is included in this motion.

If you have any questions about how to file something at the Board, please review the Board's Practice Manual contained within EOIR's Policy Manual and found on EOIR's website at [www.usdoj.gov/eoir](http://www.usdoj.gov/eoir).

Certificate of service on the opposing party at the address above is required for ALL submissions to the Board of Immigration Appeals -- including correspondence, forms, briefs, motions, and other documents. If you are the Respondent or Applicant, the "Opposing Party" is the DHS Counsel at the address shown above. Your certificate of service must clearly identify the document sent to the opposing party, the opposing party's name and address, and the date it was sent to them. Any submission filed with the Board without a certificate of service on the opposing party will be rejected.

If the respondent/applicant is unrepresented (also called pro se) and receives assistance on documents to be filed with the Board (such as help preparing an appeal, motion, form, briefs, or other documents), a Notice of Entry of Limited Appearance for Document Assistance before the Board of Immigration Appeals (Form EOIR-60) must be submitted with the document(s) that assistance was provided when filed with the Board.

Electronic filing through ECAS is mandatory for attorneys and accredited representatives appearing as practitioners of record (filed a Notice of Entry of Appearance as Attorney or Representative before the Board of Immigration Appeals (Form EOIR-27)), as well as for DHS in every case that is eligible for electronic filing. See 8 C.F.R. §§ 1003.2(g)(4), 1003.3(g)(1), 1003.31(a).

Where electronic filing is not required, use of an overnight courier service to the address listed in the FILING ADDRESS: section below is encouraged to ensure timely filing.

**FILING ADDRESS:**

Board of Immigration Appeals  
Clerk's Office  
5107 Leesburg Pike, Suite 2000  
Falls Church, VA 22041

Business hours: Monday through Friday, 8:00 a.m. to 4:30 p.m.

SallinasD

User team: Motions

Immigration and Customs Enforcement

Order of Supervision


File No: ~~XXXXXXXXXX~~  
Date: February 16, 2011

Name: Wu, Ho Kwan  
on 4/22/94, you were ordered:  
(Date of final order)

- Excluded or deported pursuant to proceedings commenced prior to April 1, 1997.
- Removed pursuant to proceedings commenced on or after April 1, 1997.

Because the Service has not effected your deportation or removal during the period prescribed by law, it is ordered that you be placed under supervision and permitted to be at large under the following conditions:

- That you appear in person at the time and place specified, upon each and every request of ICE, for identification and for deportation or removal.
- That upon request of the Service, you appear for medical or psychiatric examination at the expense of the United States Government.
- That you provide information under oath about your nationality, circumstances, habits, associations, and activities and such other information as the Service considers appropriate.
- That you do not travel outside New York / New Jersey area for more than 48 hours without first having notified this ICE office of the dates and places of such proposed travel.  
(Specify geographic limits, if any)
- That you furnish written notice to this ICE office of any change of residence or employment within 48 hours of such change.
- That you report in person on Thursday, February 24, 2011 @ 09:30am to the ICE office at: 26 Federal Plaza 9<sup>th</sup> Floor Room 9-110, New York, NY 10278 unless you are granted written permission to report on another date.
- That you assist the Immigration and Customs Enforcement in obtaining any necessary travel documents.
- Other: Comply with the conditions of the Alternatives to Detention/ Electronic Monitoring Device at ICE'S discretion.
- See attached sheet containing other specified conditions (Continue on separate sheet if required)

  
\_\_\_\_\_  
(Signature of ICE official)

John Tsoukaris (Acting) Field Office Director  
(Print name and title of ICE official)

Alien's Acknowledgment of Conditions of Release under an Order of Supervision

I hereby acknowledge that I have (read) (had interpreted and explained to me in the English language) the contents of this order, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, detention, or prosecution.

  
\_\_\_\_\_  
(Signature of ICE official serving order)

  
\_\_\_\_\_  
(Signature of alien)

02/16/2011  
Date

Department of Homeland Security  
Immigration and Customs Enforcement

Order of Supervision-Addendum

File No: ~~XXXXXXXXXX~~  
Date: February 16, 2011

Name: WU, Ho Kwan

- That you do not associate with criminals or members of a gang that is known to be involved in criminal activity.
- That you register in a substance abuse program within 14 days and provide Immigration and Customs Enforcement (ICE) with written proof of such within 30 days. The proof must include the name, address, duration, and objectives of the program as well as the name of a program counselor.
- That you register in a sexual deviancy counseling program within 14 days and provide ICE with written proof of such within 30 days. You must provide ICE with the name of the program, the address of the program, the duration and objectives of the program, and the name of a program counselor.
- That you register as a sex offender, if applicable, within 7 days of being released, with the appropriate agency/agencies and provide ICE with written proof of such registration within 10 days.
- That you do not commit any crimes or be associated with any criminal activity while on this Order of Supervision.
- That you report to a parole or probation officer as required within 5 business days and provide ICE with written verification of the officer's name, address, telephone number, and reporting requirements.
- You must follow all reporting and supervision requirements as mandated by the parole or probation officer.
- That you continue to follow any prescribed doctor's orders whether medical or psychological, including taking prescribed medications.
- That you make good faith and timely efforts to obtain a travel document and assist ICE in obtaining a travel document.
- That you submit a complete application for a travel document to all appropriate Embassies or Consulates, including those representing the countries of China. You must present ICE with evidence that each Embassy or Consulate to which you apply has received your request and all required documents. This may be done, for example, by mailing your application(s) with a request for return receipt and providing the signed return receipt to ICE, by obtaining a tracking number when you mail your application(s) and providing the number to ICE, or by submitting written confirmation of receipt issued by the Embassy or Consulate.
- That you submit your application(s) for a travel document to all appropriate Embassies or Consulates and provide proof of receipt to ICE on or before May 16, 2011 (90 days).
- That you provide ICE a copy of your application(s) for a travel document that you submit to any

Embassy or Consulate, including supporting documents, photos, and other items provided to the Embassy or Consulate to support your application(s).

- That you provide ICE a copy of all correspondence related to your travel document application(s) that you send to, or receive from, an Embassy or Consulate.
- That you contact the Embassy or Consulate within 30 calendar days of making your application(s) to confirm that the information you provided is sufficient.
- That you comply with any requests from an Embassy or Consulate for an interview and make good faith efforts to submit further documentation if required by the Embassy or Consulate.
- Every time you report in person under this order of supervision, you must inform the local ICE office of all actions you have taken to obtain a travel document. You must provide any available written documentation to ICE regarding these actions and the status of your travel document application(s).
- That you provide ICE, upon request, with any and all information relevant to application(s) for a travel document. This may include, but is not limited to, information regarding your family history, including dates of birth, nationalities, addresses, and phone numbers as requested for such persons, whether in your country of nationality and/or citizenship or elsewhere, and your past residences, schools attended, etc.
- You will participate in a supervised release program, as described in the attached document. You will comply with the rules and requirements of this program, and cooperate with its administrators.
- You will comply with the conditions of the Alternatives to Detention/ Electronic Monitoring Device.

Other:

I agree to comply with the rules, requirements, and administrators in the supervised release program described in the attached document.

Alien's signature [Signature] Date February 16, 2011

Other:

Any violation of any of the above conditions may result in a fine, more restrictive release conditions, return to detention, criminal prosecution, and/or revocation of your employment authorization document.

**Alien's Acknowledgement of Conditions of Release under an Order of Supervision**

I hereby acknowledge that I have (read) (had interpreted and explained to me in the (English language) the contents of this order and addendum, a copy of which has been given to me. I understand that failure to comply with the terms of this order and addendum may subject me to a fine, more restrictive release conditions, detention, criminal prosecution, and/or revocation of my employment authorization document.

[Signature]  
(Signature of ICE official serving order)

[Signature]  
(Signature of alien)

2/16/2011  
(date)

*Berube*

Department of Homeland Security  
Immigration and Customs Enforcement

Continuation Page for Form:

I-220B

Alien's Name  
WU, Ho Kwan

File Number

Date

February 10, 2011

Alien's Signature



RIGHT INDEX PRINT

Alien's Address

219 Mineola Ave  
Roslyn Heights, NY 11575

516 626 8018

*516 626 8018 646-537-5965*

Alien's Telephone Number (if any)

Cell Phone

PERSONAL REPORT RECORD

DATE	OFFICER	COMMENT/CHANGES
2/16/2011	DO Valle-Hartwich	Served OSUP, scheduled to report on 2/24/2011 - NYC.

02-24-11 (BD) Next 15 04-06-11 9AM

04-06-11 (BD) Next 15 07-07-11 9AM

AUTHORIZATION GRANTED TO TRAVEL TO VA AND MD FROM 6/25/11 - 5/2/11 (RM)

6/27/11 (RM) NEXT REPORT 8/29/11 8/29/2011 AT 8AM

AUTHOR. 260 TO TRAVEL TO V.A. AND M.A. FROM 6/29/11 TO 7/7/11 (RM)

8/29/2011 RPT. NEXT RPT DATE 11-28-2011 (WP)

11/28/11 NEXT Report 2/27/12

2/27/12 (RM) NEXT Report 5/28/12

Permission granted to travel to Florida from 3/1/12 to 3/8/12 (RM)

5/24/12: REPORTED. NEXT REPORT DATE 8/27/12

PERMISSION GRANTED TO TRAVEL TO CA 6/8/12 - 6/11/12 @

8/27/2012 (C) Next report date 1/10/2013 9AM (C)

5/11/13 NEXT REPORT DATE 8/08/13 10AM

8/08/2013 AT NEXT REPORT 1/16/14 10AM

1/16/14 NEXT Report Date 6/18/14 9AM

6/18/14 10AM NEXT Report Date 12/18/14 (C) 9AM

12/18/14 11/12/22/2015 @ 9AM

12/22/15 11/12/13/2016 @ 9AM

Signature  
John Tsoukaris

Title  
(Acting) Field Office Director





TAB H

*Office of Enforcement and Removal Operations*

U.S. Department of Homeland Security  
126 Northpoint Drive  
Houston, Texas 77060



**U.S. Immigration  
and Customs  
Enforcement**

Wu, Ho Kwan  
c/o Montgomery County Processing  
Center Houston Field Office



### **Notice to Alien of File Custody Review**

You are detained in the custody of U.S. Immigration and Customs Enforcement (ICE) and you are required to cooperate with ICE in effecting your removal from the United States. If ICE has not removed you from the United States within the removal period as set forth in INA 241(a) (normally 90-days of either: 1) your entering ICE custody with a final order of removal, deportation or exclusion, or 2) the date of any final order you receive while you are in ICE custody), ICE's Deciding Official will review your case for consideration of release on an Order of Supervision. Release, however, is dependent on your demonstrating to the satisfaction of the Attorney General that you will not pose a danger to the community and will not present a flight risk.

Your custody status will be reviewed on or about September 25, 2025. The Deciding Official may consider, but is not limited to considering the following:

1. Criminal convictions and criminal conduct;
2. Other criminal and immigration history;
3. Sentence(s) imposed and time actually served;
4. History of escapes, failures to appear for judicial or other proceedings, and other defaults;
5. Probation history;
6. Disciplinary problems while incarcerated;
7. Evidence of rehabilitative effort or recidivism;
8. Equities in the United States;
9. Cooperation in obtaining your travel document.
10. Any available mental health reports.

You may submit any documentation you wish to be reviewed in support of your release, prior to the date listed above to the attention of the Officer and address below. English translations must be provided pursuant to 8 CFR 103.2(b)(3). An attorney or other person may submit materials on your behalf. The deciding official will notify you of the decision in your case. Attached to this notice is a list of free or low-cost legal representatives who may be able to provide assistance to you in preparing your case.

[www.ice.gov](http://www.ice.gov)

**Notice to Alien of File Custody Review**

Wu, Ho Kwan

Page 2

**PROOF OF SERVICE**

**(1) Personal Service (Officer to complete both (a) and (b) below.)**

(a) I Dixon, DO,  
Name of ICE Officer Title  
 certify that I served Wu, Ho Kwan with a copy of  
Name of detainee  
 this document at Joe Corle Processing Center on \_\_\_\_\_ at \_\_\_\_\_  
Institution Date Time

(b) I certify that I served the custodian Ray Thompson,  
Name of Official  
Warden, at Joe Corley Processing Center, on  
Title Institution  
 \_\_\_\_\_ with a copy of this document.  
Date

**OR**

**(2) Service by certified mail, return receipt. (Attach copy of receipt)**

I \_\_\_\_\_, certify  
Name of ICE Officer Title  
 that I served \_\_\_\_\_ and the custodian \_\_\_\_\_,  
Name of detainee Name of Official  
 with a copy of this document by certified mail at \_\_\_\_\_ on \_\_\_\_\_  
Institution Date

Detainee Signature: [Signature] Date: 9/1/25

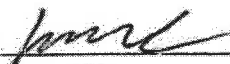

- ( ) cc: Attorney of Record or Designated Representative
- ( ) cc: A-File

Case 4:25-cv-05906 Document 1 Filed 12/09/25 in TXSD Page 87 of 94  
**INSTRUCTION SHEET TO DETAINEE REGARDING REQUIREMENT TO ASSIST IN REMOVAL**

The following is a list of things you are required to complete within 30 days of receiving this form, in order comply with your obligation to assist in obtaining a travel document:

*Mandatory requirements will be checked off by the ICE officer depending on the facts of each case. Failure to comply or provide sufficient evidence of your inability to comply, may result in the extension of the removal period and subject you to further detention. In addition, you may be subject to criminal prosecution. If you need assistance in complying with any of the requirements, please contact a Deportation Officer.*

- Submit passports (current and expired) to ICE. If you have a copy of your passport, you are to submit it.
- Apply for a travel document/passport from your embassy or consulate, or directly from your government in your native country, or any other embassy or consulate of your native country in another country.
- Comply with all instructions from all embassies or consulates requiring completion of documentation for issuance of a travel document.
- Submit to ICE birth certificates, national identification cards, and any other document issued by a foreign government indicating your citizenship, nationality, place of birth, and place of residence prior to entering the United States.
- Provide names and addresses of family and friends residing in the United States and request that they contact your embassy or consulate in the United States, in order to facilitate the issuance of a travel document.
- Provide names and addresses of family and friends residing in your country of citizenship and request family and friends residing abroad contact your government in reference to issuing a travel document.
- You are required to take measures to request reinstatement of your previous nationality, register as required, or take any other action that will ensure the issuance of a travel document and your removal from the United States.
- Provide ICE with written copies of requests to embassies or consulates requesting issuance of a travel document.
- Provide ICE with written copies of responses from embassies or consulates regarding your requests.
- Solicit permission from another country, which may be able to accept you, to enter that country to affect your removal from the United States.
- Provide your true and correct name and date of birth and any other identities you have ever used.
- Other: \_\_\_\_\_

Alien's Signature  A Number 

Served by TIERRA DIXON on \_\_\_\_\_ at CRE-T

Officer's Name                      Date                      Location

**To be served with I-229 (a) no later than 30 days after the final order**

Name: WD, HO KWAN	Field Office: CRE-T	File #: 
----------------------	------------------------	-------------

Section 243(a) of the Immigration and Nationality Act provides, in part, that:

Any alien against whom a final order of removal is outstanding by reason of being a member of any of the classes described in section 237(a) who--

- (A) willfully fails or refuses to depart from the United States within a period of 90 days\* from the date of the final order of removal under administrative processes, or if judicial review is had, then from the date of the final order of the court,
- (B) willfully fails or refuses to make timely application in good faith for travel or other documents necessary to the alien's departure,
- (C) connives or conspires, or takes any other action, designed to prevent or hamper or with the purpose of preventing or hampering the alien's departure pursuant to such, or
- (D) willfully fails or refuses to present himself or herself for removal at the time and place required by the Attorney General pursuant to such order,

shall be fined under title 18, United States Code, or imprisoned not more than four years (or 10 years if the alien is a member of any of the classes described in paragraph (1)(E), (2), (3), or (4) of section 237(a)), or both.

Nothing in this section shall make it a violation to take proper steps for the purpose of securing cancellation of or exemption from such order of removal or for the purpose of securing the alien's release from incarceration or custody.

Any action Immigration and Customs Enforcement may take to obtain a travel document for your departure or to remove you will **NOT** relieve you of the liability for compliance with the provisions of law referred to in the first paragraph above.

\* Section 241(a)(1)(C) provides for the extension of the statutory removal period if the alien refuses, during the removal period, to make application in good faith, for a travel or other document necessary for the alien's removal or departure or conspires or acts to prevent the alien's removal subject to an order of removal.

Date Order Final: October 24, 2000	Ordered Removed under Section: 212a7AiI, 212a6Ci
---------------------------------------	---

**Record of Service**  
(Check method used)

<input checked="" type="checkbox"/> <b>Record of Personal Service</b>	Date:
Served By: (Print Name and Title of Officer) TIERRA DIXON, Deportation Officer	

Officer's Signature: 	Location of Service: ICE ERO 500 Hilbig Rd. Conroe, Tx 77301
--------------------------	---

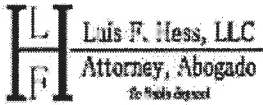
Served On: (Alien's Signature) 	Date: 9/1/25
------------------------------------	-----------------

<input type="checkbox"/> <b>Warning administered in Court</b> (Copy of order attached)	<b>Record of Personal Service (Cont.)</b>
---	---

<input type="checkbox"/> <b>Certified Mail Service</b>	Fingerprint of Alien (Specify finger used)
--	--

**Attach certified mail receipts here.**

RIGHT INDEX



Jose Pablo Lomeli Herrera <pablolomeli@luishesslaw.com>

Kwan Ho Wu A [REDACTED]

5 messages

Dixon, Tierra D <Tierra.D.Dixon@ice.dhs.gov>  
To: "pablolomeli@luishesslaw.com" <pablolomeli@luishesslaw.com>

Wed, Oct 1, 2025 at 12:41 PM

Greetings,

Thank you for reaching out. I will speak to your client regarding this matter sometimes next week. I will keep you updated along this process.

Thank you

Tierra Dixon

Deportation Officer

Houston Field Office, Joe Corley Detention Facility

*Enforcement and Removal Operations*

*U.S. Immigration and Customs Enforcement*



Jose Pablo Lomeli Herrera <pablolomeli@luishesslaw.com>  
To: "Dixon, Tierra D" <Tierra.D.Dixon@ice.dhs.gov>  
Cc: Alma Contreras <alma@luishesslaw.com>, Michael Urbanowich <michael@luishesslaw.com>

Wed, Oct 1, 2025 at 12:47 PM

Thank you for your response Officer Dixon. We are looking forward to your updates. Have a nice day!

[Quoted text hidden]

José P. Lomeli

Legal Asisstant

Phone: (281) 205-8540

Fax: (832) 200-3518

Website: luishesslaw.com

Woodlands Location: 282 Ed English Drive, Building 6 Unit D The Woodlands TX 77385

Houston Location: 7322 Southwest Freeway Suite 470 Houston TX 77074



Jose Pablo Lomeli Herrera <pablolomeli@luishesslaw.com> Mon, Oct 13, 2025 at 10:30 AM  
To: "Dixon, Tierra D" <Tierra.D.Dixon@ice.dhs.gov>  
Cc: Alma Contreras <alma@luishesslaw.com>, Michael Urbanowich <michael@luishesslaw.com>

Good Morning Officer Dixon,

I wanted to kindly follow up to your previous email. We greatly appreciate your time and assistance.

We are looking forward to your update regarding his custody status.

Thank you,  
[Quoted text hidden]

Jose Pablo Lomeli Herrera <pablolomeli@luishesslaw.com> Wed, Oct 15, 2025 at 1:09 PM  
To: Alma Contreras <alma@luishesslaw.com>

Dear Officer,

I wanted to kindly follow up to your previous email. We greatly appreciate your time and assistance.

We are looking forward to your update regarding his custody status

[Quoted text hidden]

Jose Pablo Lomeli Herrera <pablolomeli@luishesslaw.com> Wed, Oct 15, 2025 at 1:14 PM  
To: "Houston.Outreach" <Houston.Outreach@ice.dhs.gov>  
Cc: Alma Contreras <alma@luishesslaw.com>, Michael Urbanowich <michael@luishesslaw.com>

Dear Officer,

I wanted to kindly follow up to your previous email. We greatly appreciate your time and assistance.

We are looking forward to your update regarding his custody status

Respectfully  
[Quoted text hidden]  
[Quoted text hidden]

TAB H

**PETITIONER VERIFICATION**

Petitioner, Kwan Ho Wu, is currently detained in ICE custody, and has authorized Counsel, Michael Urbanowich, to verify, on his behalf, that the facts stated therein are true and correct to the best of his knowledge and belief.



---

Michael Urbanowich  
Attorney for Petitioner  
Kwan Ho Wu

Date: December 09, 2025.

**CERTIFICATE OF SERVICE**

On December 09, 2025, Counsel for Plaintiff served a copy of the attached Complaint via USPS Certified Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Ray Thompson, in his official capacity as Warden of the Joe Corley Processing Center**, at (1) Office of the Warden, 500 Hilbig Rd, Conroe, TX 77301, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300 Houston, TX 77002.

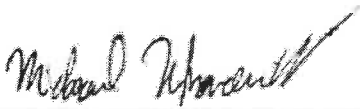


\_\_\_\_\_  
Michael Urbanowich  
Attorney for Petitioner

12/09/2025

\_\_\_\_\_  
Date

On December 09, 2025, Counsel for Plaintiff served a copy of the attached Complaint via USPS Certified Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Bret Bradford, in his official capacity as Field Office Director, of ICE Enforcement and Removal Operations at the Houston Field Office**, at (1) Office of the Field Office Director, Enforcement and Removal Operations, Houston Field Office, 126 Northpoint Drive, Houston, Texas 77060, and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston Texas, 77002.



\_\_\_\_\_  
Michael Urbanowich  
Attorney for Petitioner

12/09/2025

\_\_\_\_\_  
Date

**CERTIFICATE OF SERVICE**

On December 09, 2025, Counsel for Plaintiff served a copy of the attached Complaint via USPS Certified Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Kristi Noem, in her official capacity as Secretary of Homeland Security**, at (1) Office of General Counsel, U.S. Department of Homeland Security, 245 Murray Lane, Mail Stop 0485, Washington, D.C. 20530; and (2) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.



Michael Urbanowich  
Attorney for Petitioner

12/09/2025

Date

On December 09, 2025, Counsel for Plaintiff served a copy of the attached Complaint via USPS Certified Mail, in compliance with Rule 4 of Federal Rules of Civil Procedure, upon the **Respondent, Pam Bondi, in her Official Capacity as Attorney General of the United States**, at (1) U.S. Attorney General, 950 Pennsylvania Avenue, NW, Washington, D.C. 20530-0001; and (2) to the Assistant Attorney General for Administration, U.S. Department of Justice, Justice Management Division, 950 Pennsylvania Avenue, NW, Room 1111, Washington, D.C. 20530; and (3) to the United States at Civil Process Clerk, U.S. Attorney's Office, 1000 Louisiana Street, Suite 2300, Houston, Texas 77002.



Michael Urbanowich  
Attorney for Petitioner

12/09/2025

Date