

**UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS**

Wilnancy Cantillo Montero

Petitioner,

v.

Case No. 3:25-cv-00706

**VERIFIED PETITION
FOR WRIT OF HABEAS
CORPUS**

Joel GARCIA, Field Office Director of
Enforcement and Removal Operations, El Paso
Field Office, Immigration and Customs
Enforcement; Kristi NOEM, Secretary, U.S.
Department of Homeland Security; U.S.
DEPARTMENT OF HOMELAND SECURITY;
Pamela BONDI, U.S. Attorney General;
Todd LYONS, Acting Director and Senior
Official Performing the Duties of the Director
of U.S. Immigration and Customs Enforcement;
Warden of ERO El Paso Camp East Montana;
in their official capacities,

Respondents.

INTRODUCTION

1. Petitioner Wilnancy Cantillo Montero is a Cuban national with a pending I-485 Application to Register Permanent Residence or Adjust Status.¹ She was allowed to enter the United States on July 22, 2024 on a two-year grant of parole under 8 U.S.C. § 1182(d)(5). But her parole was unlawfully revoked in April 2025 and she was illegally detained when she appeared for an immigration court hearing on November 5, 2025. In addition to being contrary to law, this detention has prevented her from attending the necessary biometrics appointment to complete her adjustment of status.

2. Accordingly, to vindicate Petitioner's statutory, constitutional, and regulatory rights, this Court should grant the instant petition for a writ of habeas corpus.

3. Petitioner alleges violations of the 4th and 5th Amendments to the United States Constitution and the Administrative Procedure Act.

4. Petitioner asks this Court to find that her arrest and detention are illegal and order her immediate release, a stay of transfer outside of the Western District of Texas, and a reasonable award of attorney's fees.

JURISDICTION

5. Petitioner is in the physical custody of Respondents. Petitioner is detained at ERO El Paso Camp East Montana at Fort Bliss in El Paso, Texas.

¹ Cuban nationals who are physically present in the United States for at least one year may apply for permanent residency if they were inspected and admitted or paroled after January 1, 1959, and are otherwise admissible for lawful permanent residence. *See* Pub. L. 89-732; *Green Card for a Cuban Native or Citizen*, USCIS (last updated Jul. 7, 2025), <https://www.uscis.gov/green-card/green-card-eligibility/green-card-for-a-cuban-native-or-citizen>. This process will be referred to as "Cuban Adjustment."

6. This Court has subject matter jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause).

7. This Court may grant relief pursuant to the habeas corpus statutes, 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

VENUE

8. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Western District of Texas, the judicial district in which Petitioner is currently detained.

9. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the Western District of Texas.

REQUIREMENTS OF 28 U.S.C. § 2243

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

11. Habeas corpus is “perhaps the most important writ known to the constitutional law . . . affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). “The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and

receives prompt action from him within the four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

PARTIES

12. Petitioner **Wilnancy Cantillo Montero** is a citizen of Cuba who has been in immigration detention since November 5, 2025. Petitioner has a pending I-485 Application to Register Permanent Residence or Adjust Status based on her status as a Cuban national who has been physically present in the United States for over one year. Petitioner is a resident of Albuquerque, New Mexico. She is in custody and under the direct control of Respondents and their agents.

13. Respondent **Joel Garcia** is the Director of the El Paso Field Office of ICE’s Enforcement and Removal Operations division. As such, Mr. Garcia is Petitioner’s immediate custodian and is responsible for Petitioner’s detention and removal. He is named in his official capacity.

14. Respondent **Kristi Noem** is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the Immigration and Nationality Act (INA), and oversees ICE, which is responsible for Petitioner’s detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

15. Respondent **Department of Homeland Security (DHS)** is the federal agency responsible for implementing and enforcing the INA, including the detention and removal of noncitizens.

16. Respondent **Pamela Bondi** is the Attorney General of the United States. She is responsible for the Department of Justice, of which the Executive Office for Immigration Review

and the immigration court system it operates is a component agency. She is sued in her official capacity.

17. Respondent **Todd Lyons** is named in his official capacity as Acting Director and Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement. As such, he is a legal custodian of Petitioner.

18. Respondent **Warden of the ERO El Paso Camp East Montana** is the Warden of the facility where Petitioner is detained. He has immediate physical custody of Petitioner. He is sued in his official capacity.

STATEMENT OF FACTS

19. Petitioner **Wilnancy Cantillo Montero** is a 53-year-old citizen of Cuba. Following a lawful process that was in place in 2024, Petitioner applied to enter the United States through the CBP One application and received an appointment to come to the United States to present her application for asylum.

20. On July 22, 2024, Petitioner presented at the border for her CBP One appointment. The border official decided to permit her entry and that she could pursue lawful status outside of detention. Petitioner was served with a Notice of Appear (NTA), stating that she was placed in removal proceedings under section 240 of the Immigration and Nationality Act and requiring that she appear before an immigration judge on February 6, 2025, at the El Paso Immigration Court. Exhibit 2.

21. The NTA also stated Petitioner was “paroled into the United States of America pursuant to Section 212(d)(5) of the Immigration and Nationality Act” on July 22, 2024.² *Id.* Pursuant to that parole, Petitioner was issued an I-94 and allowed to enter the United States. Exhibit 3. The I-94 stated that Petitioner’s parole would expire on July 21, 2026. *Id.*

22. After entering the United States, Petitioner resided with her spouse in Albuquerque, New Mexico. Petitioner’s spouse is a Lawful Permanent Resident; he obtained residency in 2019 through the process for Cuban Adjustment.

23. Petitioner applied for and received authorization from the United States Citizenship and Immigration Services (USCIS) to work in the fall of 2024. She retained positions at a Family Dollar and as a package delivery driver for Amazon. She also began schooling to be certified as a medical assistant, as she had been a licensed nurse in Cuba. In a letter to the immigration court, the supervisor at her clinical internship described her as “an individual of exceptional moral character and integrity.” Exhibit 4. Petitioner graduated from her program in December 2025 but could not attend graduation because of ICE’s unlawful detention.

24. Pursuant to the NTA, Petitioner appeared before the El Paso Immigration Court on February 6, 2025. At that hearing, the Immigration Judge (IJ) informed Petitioner that she could apply for Cuban Adjustment after one year of residing in the United States. The IJ scheduled her next hearing for November 5, 2025.

25. On October 21, 2025, Petitioner submitted her I-485 Application to Register Permanent Residence or Adjust Status to USCIS. Exhibit 5. USCIS scheduled Petitioner for a biometrics services appointment on November 30, 2025. The biometrics appointment is a

² This provision of the INA is codified at 8 U.S.C. § 1182(d)(5).

necessary part of the process to adjust status; applicants must attend the appointment to provide their fingerprints, photograph, signature, and certification that the application was truthful. *See Preparing for Your Biometric Services Appointment*, USCIS (last updated Jul. 24, 2025), <https://www.uscis.gov/forms/filing-guidance/preparing-for-your-biometric-services-appointment>.

26. Also in October 2025, Petitioner learned for the first time that the Department of Homeland Security had revoked her parole. It was originally scheduled to expire in July 2026, but at an unknown time the Department changed the expiration date to April 2025. Petitioner only learned of the change when she downloaded an electronic version of her I-94 for the purposes of her I-485 application. Exhibit 6. It is likely this changed expiration date was part of a nationwide revocation of parole by the Department of Homeland Security. *See Ali Bianco, DHS revokes parole for hundreds of thousands who entered via the CBP One App, Politico, April 8, 2025.*

27. On November 5, 2025, Petitioner attended her scheduled hearing at the El Paso Immigration Court. Petitioner confirmed to the IJ that she had submitted her application for Cuban Adjustment. The Department of Homeland Security moved to dismiss Petitioner's immigration proceedings so they could put her in expedited removal proceedings under 8 USC § 1225. The Court denied the motion based on the lack of changed circumstances, including the Department's initial decision to place Petitioner in standard removal proceedings rather than expedited removal, the Department's decision to parole Petitioner into the country, and Petitioner's prima facie eligibility for Cuban Adjustment. Exhibit 7. The IJ scheduled Petitioner's next court hearing for February 13, 2026. Exhibit 8.

28. When Petitioner walked out of the courtroom, she was detained by officers from Immigration and Customs Enforcement (ICE). The ICE officers transferred her to the ERO El Paso Camp East Montana detention facility at Fort Bliss in El Paso, Texas, where she is still detained.

29. Because Petitioner was in detention, she was unable to attend the biometrics appointment for her adjustment application that was scheduled for November 30, 2025. ICE did not transport her.

30. On December 5, 2025, USCIS announced that they would not coordinate with ICE regarding the collection of biometrics of noncitizens in custody with pending USCIS benefit requests. Exhibit 9.

LEGAL FRAMEWORK

Statutory and Regulatory Procedures for Termination of Parole

31. Under 8 U.S.C. § 1182(d)(5), the Secretary of Homeland Security may parole into the United States “on a case-by-case basis for urgent humanitarian reasons or significant public benefit” any noncitizen applying for admission to the country.³

32. Like all releases from immigration detention, a release on parole requires a determination by an immigration officer that the noncitizen’s “release would not pose a danger to property or persons” and that the noncitizen “is likely to appear for any future proceeding.” 8 C.F.R. § 1236.1(c)(8).

33. A noncitizen’s parole may be terminated when, “in the opinion of the Secretary of Homeland Security,” “the purposes of [] parole . . . have been served.” 8 U.S.C. § 1182(d)(5). This

³ The Secretary has further delegated that authority by regulation to various officials in the Department of Homeland Security. *See* 8 C.F.R. § 212.5(a).

decision to terminate must be made “in accordance with” the terms of 8 U.S.C. § 1182(d)(5) — in other words, on a “case-by-case basis.” 8 C.F.R. § 212.5(c).

34. A grant of parole terminates automatically, without written notice, (a) when the noncitizen departs the United States, or (b) “if not departed, at the expiration of the time for which parole was authorized.” 8 C.F.R. § 212.5(e)(1). In all other cases, parole “shall be terminated upon written notice to the alien” when the “purpose for which parole was authorized” is “accomplish[ed]” or “when in the opinion of” the DHS Secretary or an authorized official “neither humanitarian reasons nor public benefit warrants the continued presence of the alien in the United States.” 8 C.F.R. § 212.5(e)(2).

35. This reading of the regulatory and statutory framework surrounding parole revocations has been affirmed by numerous federal courts: “Several courts have found that just as a grant of parole requires an individualized review, revocation of parole requires a case-by-case assessment to comply with the statute. . . . This Court agrees that both common sense and the words of the statute require parole revocation to be analyzed on a case-by-case basis and that a decision to revoke parole must attend to the reasons an individual [noncitizen] received parole.” *Mata Velasquez v. Kurzdofer*, 25-CV-493-LJV, Dkt. 63 at 22-23 (W.D.N.Y. Jul. 16, 2025) (internal quotations omitted) (alteration in original) (citing *Y-Z-L-H v. Bostock*, 2025 WL 1898025, at *7 (D. Or. July 9, 2025) (“Common sense suggests . . . that parole given only on a case-by-case basis is to be terminated only on such a basis.”); *Doe v. Noem*, 2025 WL 1099602, at *18 (D. Mass. Apr. 14, 2025) (“The statute thus seems to contemplate termination of parole on an individual, rather than categorical, basis. This makes sense: Even under the categorical programs, grants of parole were to be made on a case-by-case basis.”)).

Petitioner’s Protected Liberty Interest in her Continued Release

36. Once released on a grant of parole, constitutional due process also requires that a person like Petitioner receive a hearing before a neutral decisionmaker to determine whether any re-detention is justified, and whether the person is a flight risk or danger to the community.

37. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty protected by the Due Process Clause.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

38. Consistent with this principle, individuals released on parole or other forms of conditional release have a liberty interest in their “continued liberty.” *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972).

39. Such liberty is protected by the Fifth Amendment because, “although indeterminate, [it] includes many of the core values of unqualified liberty,” such as the ability to be gainfully employed and live with family, “and its termination inflicts a ‘grievous loss’ on the [released individual], and often on others.” *Id.*; see also *Santiago Santiago v. Noem*, No. EP-25-CV-361-KPC, Dkt. 25 at 23 (W.D. Tex. Oct. 1, 2025) (“A number of district courts have extended this reasoning [from *Morrissey*] to the immigration context and held that once released from immigration custody, noncitizens acquire a protectable liberty interest in remaining out of custody on bond.”) (internal quotations and citations omitted).

40. To guarantee against arbitrary re-detention and to guarantee the right to liberty, due process requires “adequate procedural protections” that ensure the government’s asserted justification for a noncitizen’s physical confinement “outweighs the individual’s constitutionally protected interest in avoiding physical restraint.” *Zadvydas*, 533 U.S. at 690 (citation modified).

41. Due process thus guarantees notice and an individualized hearing before a neutral decisionmaker to assess danger or flight risk before the revocation of an individual's release. *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970) (“The fundamental requisite of due process of law is the opportunity to be heard . . . at a meaningful time in a meaningful manner.” (citation modified)); *see also Morrissey*, 408 U.S. at 485 (requiring preliminary hearing “to determine whether there is probable cause or reasonable ground to believe that the arrested parolee has committed acts that would constitute a violation of parole conditions” and that such determination be made “by someone not directly involved in the case”).

42. Numerous courts have recognized that these principles apply with respect to the re-detention of the many noncitizens that DHS has recently begun taking back into custody, often after such persons have been released for months and years. *See, e.g., Garcia Domingo v. Castro*, 1:25-cv-00979-DHU-GJF, Dkt. 7 (D.N.M. Oct. 15, 2025) (ordering immediate release due to lack of pre-deprivation hearing); *Valdez v. Joyce*, No. 25 CIV 4627 (GBD), 2025 WL 1707737 (S.D.N.Y. June 18, 2025) (similar); *Pinchi v. Noem*, --- F. Supp. 3d ---, No. 5:25-CV-05632-PCP, 2025 WL 2084921 (N.D. Cal. July 24, 2025) (similar); *Maklad v Murray*, No. 1:25-CV-00946 JLT SAB, 2025 WL 2299376 (E.D. Cal. Aug. 8, 2025) (similar); *Garcia v. Andrews*, No. 1:25-CV-01006 JLT SAB, 2025 WL 2420068 (E.D. Cal. Aug. 21, 2025) (similar).

43. In making these determinations, courts have applied the *Mathews v. Eldridge* test to determine whether adequate process was provided. 424 U.S. 319, 332 (1976). The 5th Circuit has confirmed that the *Mathews* balancing test applies to immigration detention. *See W.M.M. v. Trump*, No. 25-10534, 2025 WL 2508869 (5th Cir. Sept. 2, 2025). *Mathews* requires a court to consider: (1) the private interest affected by continued detention; (2) the risk of erroneous

deprivation under the procedures used and the probable value of additional safeguards; and (3) the government's interests and the burdens of additional procedures. 424 U.S. at 335.

44. These factors all demand Petitioner receive a hearing prior to the revocation of her parole. As one federal court explained, even a noncitizen whose parole had expired must be given such a hearing before being detained: "Contrary to Respondents' arguments, this private interest did not expire along with Petitioner's parole agreement. Once established, Petitioner's interest in liberty is a constitutional right which may only be revoked through methods that comport with due process, such as a hearing in front of a neutral party to determine whether Petitioner's re-detainment is warranted. . . . That the express terms of the parole notice allowed for discretionary termination or expiration does not somehow obviate the need for the Government to provide an individualized hearing prior to re-detaining the parolee." *Ramirez Tesara v. Wamsley*, No. 2:25-cv-01723-MJP-TLF, Dkt. 19 at 7 (W.D. Wa. Sep. 19, 2025) (internal citations omitted).

45. These principles compel Petitioner's immediate release.

CLAIMS FOR RELIEF

COUNT I

Violation of the Administrative Procedure Act – 5 U.S.C. § 706(2)(A) Not in Accordance with Law and in Excess of Statutory Authority Unlawful Detention

46. Petitioner restates and realleges all paragraphs as if fully set forth herein.

47. An agency must "abide by its own regulations." *Richardson v. Joslin*, 501 F.3d 415, 418 (5th Cir. 2007); accord *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260 (1954).

48. DHS regulations require “termination upon written notice” when, on a case-by-case basis, an authorized official finds that “neither humanitarian reasons nor public benefit warrants the continued presence of the alien in the United States” and that the purpose for which parole was authorized has been accomplished. 8 C.F.R. § 212.5(e)(2)(i).

49. Respondent’s decision to terminate Petitioner’s parole violated 8 C.F.R. § 212.5(e)(2)(i) in at least two ways.

50. First, Respondents did not provide written notice of the termination of Petitioner’s parole. Petitioner did not learn her parole was terminated until six months after the fact, when she was preparing her application for Adjustment of Status.

51. Second, Respondents did not make a case-by-case determination that “neither humanitarian reasons nor public benefit warrants the continued presence of the alien in the United States” when they terminated Petitioner’s parole at the same time as the parole of hundreds of thousands of noncitizens. 8 C.F.R. § 212.5(e)(2)(i).

52. Having violated 8 C.F.R. § 212.5, the Respondents’ terminations of Petitioner’s parole was “not in accordance with law.” 5 U.S.C. § 706(2)(A).

COUNT II

Violation of Fifth Amendment Right to Due Process Procedural Due Process 5 U.S.C. §§ 702, 706

53. Petitioner restates and realleges all paragraphs as if fully set forth herein.

54. The Due Process Clause of the Fifth Amendment to the U.S. Constitution prohibits the federal government from depriving any person of “life, liberty, or property, without due process of law.” Due process protects “all ‘persons’ within the United States, including [non-citizens],

whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533 U.S. at 693.

55. The procedural due process guarantee of the Fifth Amendment requires that individuals be provided notice and an opportunity to be heard before being deprived of liberty or property interests. *Mathews v. Eldridge*, 424 U.S. 319, 332 (1976).

56. The government’s decision to revoke Petitioner’s parole and subsequently detain her, without any notice or opportunity to respond, clearly violates her procedural due process rights.

COUNT III

Violation of Fifth Amendment Right to Due Process Substantive Due Process 5 U.S.C. §§ 702, 706

57. Petitioner restates and re-alleges all paragraphs as if fully set forth herein.

58. Substantive due process requires that there be a reasonable relation between an individual’s detention and the government’s purported interest in that detention. *See Jackson v. Indiana*, 406 U.S. 715, 738 (1972); *Brown v. Taylor*, 911 F.3d 235, 243 (5th Cir. 2018). With immigration detention, the Supreme Court has acknowledged that the government’s interests are limited to (1) preventing flight risk, so a person can go through removal proceedings and ultimately be removed, or (2) otherwise ensuring the safety of the community. *Zadvydas*, 533 U.S. 678, 690-91 (2001).

59. Petitioner is not a flight risk nor is she a danger to the community. An immigration officer made that determination when they allowed her to enter with parole. 8 C.F.R. § 1236.1(c)(8). Since the United States allowed her to enter in July 2024, she has set down roots,

including obtaining employment, graduating from a program to be a medical assistant, and creating a home with her husband in Albuquerque. Respondents' detention of Petitioner is therefore unjustified and unlawful.

COUNT IV

**Violation of the Fourth Amendment to the U.S. Constitution
Unlawful Arrest
5 U.S.C. §§ 702, 706**

60. Petitioner restates and re-alleges all paragraphs as if fully set forth herein.

61. Petitioner was detained by federal immigration officials as removable when she entered the United States. The government exercised its discretion under the Immigration and Nationality Act to release, or parole, her while she litigated that charge in immigration court. At the time of Petitioner's arrest, she had been living at liberty pursuant to a parole determination by federal immigration authorities.

62. The government lacked reliable information of changed or exigent circumstances that would justify her arrest after federal immigration authorities had already decided she could pursue her claims for immigration relief at liberty. Her re-arrest based solely on the fact that she is subject to removal proceedings is unreasonable and violates the Fourth Amendment.

COUNT V

**Violation of the Fifth Amendment to the U.S. Constitution
Interference with Adjustment of Status**

63. Petitioner restates and re-alleges all paragraphs as if fully set forth herein.

64. Because of Respondents' detention of Petitioner, she was unable to attend the biometrics appointment on November 30, 2025 to complete the process for Cuban Adjustment.

65. Further, USCIS announced that they would not coordinate with ICE regarding the collection of biometrics of noncitizens in custody with pending USCIS benefit requests. Exh. 8.

66. Respondents' detention of Petitioner thus impedes her ability to avail herself of immigration benefits for which she is facially eligible, in violation of her Fifth Amendment right to due process.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

- a. Assume jurisdiction over this matter;
- b. Order that Petitioner shall not be transferred outside the Western District of Texas while this habeas petition is pending;
- c. Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days as required by 28 U.S.C. § 2243;
- d. Issue a Writ of Habeas Corpus requiring that Respondents release Petitioner from custody immediately and permanently enjoin her re-detention absent written notice and a hearing prior to re-detention where Respondents must prove by clear and convincing evidence that she is a flight risk or danger to the community and that no alternatives to detention would mitigate those risks;
- e. Declare that Petitioner's detention without an individualized determination before a neutral decisionmaker violates the Administrative Procedure Act, the 4th Amendment, and the Due Process Clause of the 5th Amendment of the United States Constitution;
- f. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act

(“EAJA”), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

- g. Grant any other and further relief that this Court deems just and proper.

DATED this 19th of December 2025.

/s/ Zoe Bowman
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Attorneys for Petitioner

Verification by Someone Acting on Petitioner's Behalf Pursuant to 28 U.S.C. § 2242

I am submitting this verification on behalf of Petitioner because I am one of the Petitioner's attorneys. I have discussed with Petitioner the events described in this Petition. On the basis of that discussion, I hereby verify that the statements made in this Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

/s/ Zoe Bowman
Zoe Bowman

Date: December 19, 2025

CERTIFICATE OF SERVICE

I hereby certify that on December 19, 2025, I sent the foregoing pleading via certified mail to the following individuals at their respective addresses:

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