

UNITED STATES DISTRICT COURT

DISTRICT OF NEW MEXICO**

ROGELIO BOLUFE IZQUIERDO A
Petitioner,



v. Civil Action No. _____

MELISSA ORTIZ,
Warden, Torrance County Detention Facility;

JOEL GARCIA,
Field Office Director, U.S. Immigration and Customs Enforcement;

TODD M LYONS,
Acting Director, U.S. Immigration and Customs Enforcement;

KRIST NOEM,
Secretary, U.S. Department of Homeland Security;

PAMELA JO BONDI,
Attorney General of the United States,
Respondents.

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

DEC 24 2025

MITCHELL R. ELFERS
CLERK

MEMORANDUM OF LAW IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241**

I. INTRODUCTION

Petitioner **Rogelio Bolufe Izquierdo, A**  is a civil immigration detainee currently confined at **Torrance County Detention Facility ("TCDF")** in Estancia, New Mexico. Petitioner seeks habeas corpus relief under 28 U.S.C. § 2241 because his detention has become **unconstitutional, punitive, coercive, and unlawful**, in violation of the **Fifth Amendment's Due Process Clause**, federal statutes, and binding Supreme Court precedent.

Although Petitioner's detention is civil—not criminal—he has been subjected to **torture, overmedication, physical and psychological abuse, deprivation of medical care, denial of**

legal access, interpreter misconduct, obstruction of evidence preparation, and punitive treatment incompatible with civil confinement. (See Exhibits A-1T through A-18T; 20–25-O.)

Further, Immigration Judge Matthew Andrasko issued a **written order dated November 20, 2025**, which **contradicts his oral rulings**, disregards the record, and bases denial of relief on **unsupported allegations** introduced by DHS at the last minute. (Exhibit 25-O.) These defects violate due process and render Petitioner’s ongoing detention unlawful.

Petitioner has exhausted all remedies available to him. The District of New Mexico is the proper forum because Petitioner is detained within its jurisdiction and Respondent Warden Ortiz is his immediate custodian.

For the reasons set forth below, the Court should:

1. **Grant the writ of habeas corpus,**
2. **Order Petitioner’s immediate release, or**
3. **Order any alternative relief necessary to remedy constitutional violations, including expedited review.**

II. JURISDICTION AND VENUE

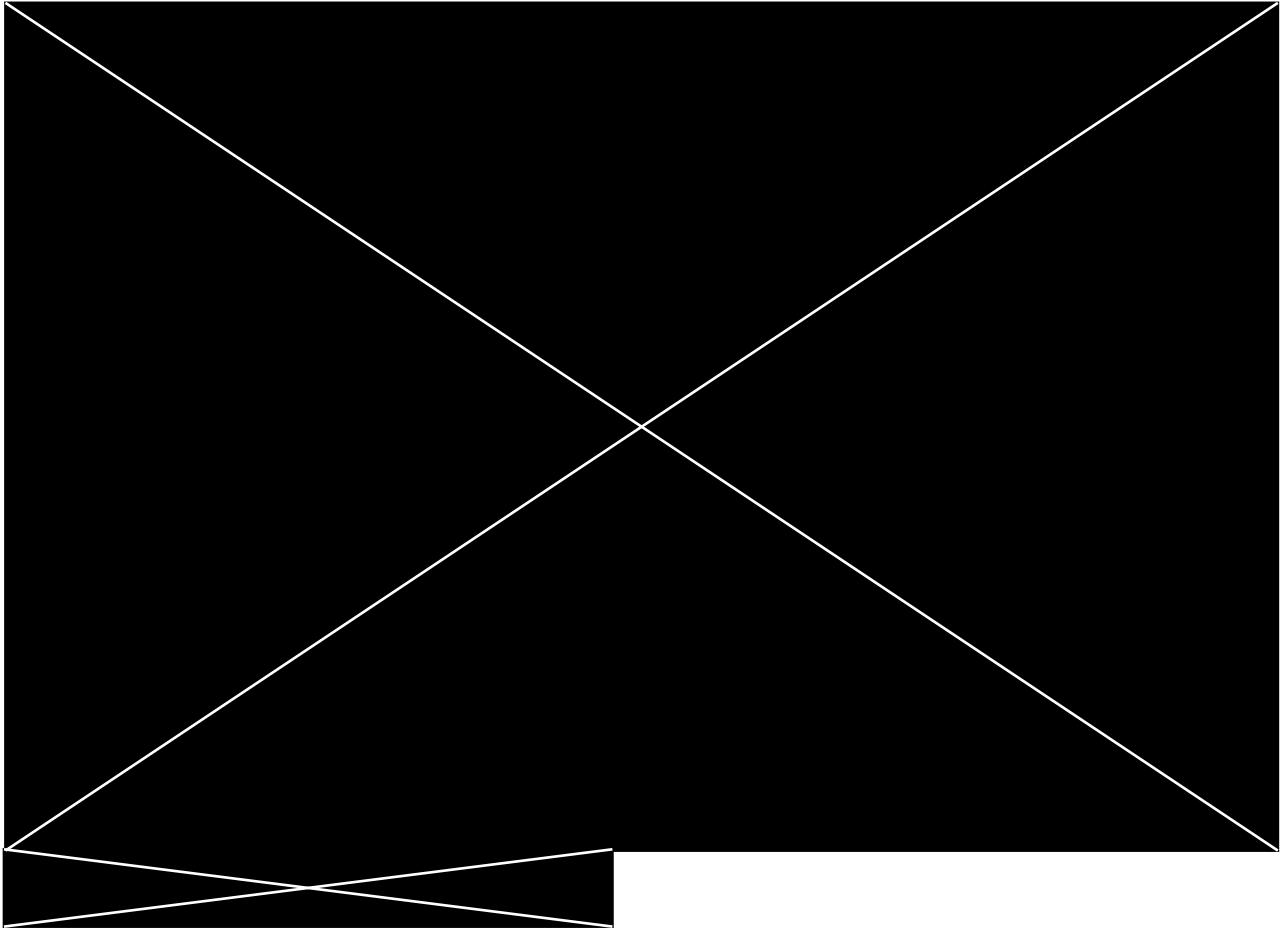
This Court has jurisdiction under **28 U.S.C. § 2241(c)(3)**, which authorizes federal courts to grant habeas relief to individuals “**in custody in violation of the Constitution or laws or treaties of the United States.**”

Jurisdiction is further confirmed by:

- **INS v. St. Cyr**, 533 U.S. 289 (2001) (habeas jurisdiction preserved for constitutional claims and questions of law);
- **Jennings v. Rodriguez**, 138 S. Ct. 830 (2018) (noncitizens may bring constitutional challenges to immigration detention);
- **Zadvydas v. Davis**, 533 U.S. 678 (2001) (detention violates due process when it becomes arbitrary, prolonged, or unreasonable).

Venue is proper in the **District of New Mexico** because Petitioner is detained at **TCDF in Estancia, New Mexico**, and his **immediate custodian**, Respondent **Warden Ortiz**, is located within this District. See **Rumsfeld v. Padilla**, 542 U.S. 426 (2004).

III. BACKGROUND:



IV. MY IMMIGRATION STATUS AT THE TIME OF DETENTION

I have lived in the United States for four years.

I applied **lawfully** for my permanent residence under the **Cuban Adjustment Act**.

Before ICE detained me:

- I completed my biometrics
- I attended my USCIS interview
- My Green Card was **pending approval**
- My fiancée and I were waiting for the decision

I had **no criminal history**, had complied with every USCIS requirement, and was **fully eligible for lawful status**.

My detention occurred in the middle of a valid and pending immigration process, raising serious due process concerns and evidence of improper enforcement.

V. CUSTODY REQUIREMENT

The habeas statute requires a petitioner to be “**in custody**” under 28 U.S.C. § 2241(c). Petitioner satisfies this requirement because:

- He is currently held at **Torrance County Detention Facility**,
- He is subject to immigration detention under DHS authority, and
- His liberty is severely restrained.

The proper respondent in a §2241 petition is the **immediate custodian**, the person with direct control over the detainee. See **Padilla**, 542 U.S. at 434–35. Thus, Respondent **MELISSA ORTIZ, Warden**, is the primary habeas respondent. Additional federal officials are included because the petition challenges both detention conditions and statutory authority underlying detention.

VI. LEGAL STANDARDS GOVERNING § 2241 HABEAS REVIEW

A. Habeas Relief Is Available for Constitutional Violations in Immigration Detention

Habeas corpus under 28 U.S.C. § 2241 is the appropriate vehicle for noncitizens who challenge:

1. the **legality of their detention**,
2. the **conditions of confinement** that render detention unconstitutional,
3. the **deprivation of due process** in removal proceedings.

The Supreme Court has confirmed repeatedly:

- **INS v. St. Cyr**, 533 U.S. 289, 305 (2001):
§2241 habeas jurisdiction survives for questions of law and constitutional claims.
- **Zadvydas v. Davis**, 533 U.S. 678, 699 (2001):
Detention becomes unlawful when no longer reasonably related to its purpose.
- **Jennings v. Rodriguez**, 138 S. Ct. 830, 839 (2018):
Noncitizens may bring constitutional challenges to immigration detention through habeas.

Thus, this Court has full authority to review Petitioner’s constitutional claims.

B. Civil Immigration Detention Cannot Be Punitive

Under the **Fifth Amendment**, civil detainees cannot be punished.

See:

- **Bell v. Wolfish**, 441 U.S. 520, 535 (1979):
If a condition or restriction is “arbitrary or purposeless,” it is unconstitutional.
- **Jones v. Blanas**, 393 F.3d 918 (9th Cir. 2004):
Civil detainees must not face conditions worse than those imposed on criminals.

The **conditions Petitioner experienced—torture, freezing cells, shackling, denial of medical care, denial of legal access—are punitive**, not regulatory.

They render his detention unconstitutional.

(See Exhibits A-1T through A-18T; 23; 24.)

C. The Fifth Amendment Guarantees Access to Counsel and the Courts

Fundamental due process includes:

- The right to meaningful access to legal materials and counsel.
- The right to prepare for hearings and appeal.

Key cases:

- **Bounds v. Smith**, 430 U.S. 817, 828 (1977):
Government must provide adequate law libraries or assistance to ensure access to courts.
- **Lewis v. Casey**, 518 U.S. 343, 351 (1996):
Interference with legal access violates the Constitution.
- **Agyeman v. INS**, 296 F.3d 871, 877 (9th Cir. 2002):
Immigration detainees must receive meaningful opportunity to prepare their cases.

Yet Petitioner was:

- denied law library access for weeks,
- denied access to tablets with legal tools,
- denied legal books for **31 days** (Exhibit 25-I),
- denied fax and phone access to lawyers (Exhibit 25-D),
- obstructed from receiving translated documents needed for court.

This is a direct constitutional violation.

D. Interpreter Misconduct Violates Due Process

Federal courts recognize interpreter failure as a due process violation because it undermines the fairness of the hearing.

- **Perez-Lastor v. INS**, 208 F.3d 773, 778 (9th Cir. 2000):
Inaccurate translation invalidates immigration proceedings.
- **He v. Ashcroft**, 328 F.3d 593, 598 (9th Cir. 2003):
Interpreter errors that distort testimony deny due process.

Petitioner documented **serious translation errors** (Exhibit 25-E) by interpreter Daniel Saenz, which affected understanding of testimony and credibility.

This alone warrants federal intervention.

E. Removal to a Country Without a Legal Basis Violates Federal Law

Removal designation is governed by **8 U.S.C. § 1231(b)(2)**.

A country cannot be designated unless:

1. the respondent is a citizen or national of that country,
2. the country agrees to accept the respondent, and
3. DHS supports the designation with evidence.

Immigration Judge Andrasko:

- designated **Ecuador** without evidence,
- ignored Cuba's statutory primacy under §1231(b)(2)(A)–(D),
- relied solely on an unsupported last-minute DHS claim.

This violates:

- **Cardoza-Fonseca**, 480 U.S. 421 (1987) — fair adjudication required.
- **Nuru v. Gonzales**, 404 F.3d 1207 (9th Cir. 2005) — non-refoulement obligations.
- **Maldonado v. Holder**, 786 F.3d 1155 (9th Cir. 2015).

(See Exhibit 25-O.)

F. Contradictions Between Oral and Written IJ Decisions Are Reversible Errors

Courts have held:

- **Mejia v. Sessions**, 866 F.3d 573, 592 (4th Cir. 2017):
When an IJ's written order contradicts the oral ruling, due process is violated.
- **Matter of M-D-**, 24 I&N Dec. 138, 141 (BIA 2007):
The written decision must reflect the oral findings.

Here, Judge Andrasko's written order contradicts his own oral statements regarding evidence, credibility, and designation.
(See Exhibit 25-O.)

This is a due process violation that federal courts may correct through habeas.

G. Prolonged Civil Detention Without a Bond Hearing Is Unconstitutional

Key cases:

- **Jennings v. Rodriguez**, 138 S. Ct. at 846 — prolonged detention raises serious constitutional problems.
- **Zadvydas**, 533 U.S. at 690 — detention becomes unconstitutional when no longer reasonably related to removal.
- **Demore v. Kim**, 538 U.S. 510 (2003) — permissible detention is brief and finite.

Petitioner has been detained for **months under unconstitutional conditions**, subjected to torture and denial of counsel, with no meaningful opportunity to challenge the legality of his detention.

This violates due process.

VII. ARGUMENT

A. Petitioner's Civil Detention Has Become Unconstitutionally Punitive

(Under *Bell v. Wolfish*, 441 U.S. 520 (1979))**

The Constitution forbids punitive treatment of civil detainees.
Because immigration detention is not punishment, conditions of confinement must be **nonpunitive, reasonable, and not excessive**.

Under **Bell v. Wolfish**, 441 U.S. 520, 535 (1979),** civil detention violates due process when:

1. conditions are **intended to punish**, or
2. conditions are not **reasonably related** to any legitimate governmental interest.

Here, Petitioner has endured **torture, assault, overmedication, freezing temperatures, shackling, sleep deprivation, and threats**, as documented in:

- **A-1T through A-18T** — multiple detainee testimonies of torture inside “Alcatraz.”
- **Exhibit 23** — foreign object (“rock”) in Petitioner’s food.
- **Exhibit 24** — denial of safe drinking water.
- **25-F** — commissary denial during Thanksgiving week.

None of these practices further any legitimate immigration purpose.

Federal courts have repeatedly held that **conditions more restrictive than criminal incarceration violate due process** for civil detainees. See:

- *Jones v. Blanas*, 393 F.3d 918, 933 (9th Cir. 2004).
- *Youngberg v. Romeo*, 457 U.S. 307, 321–22 (1982).

TCDF’s conditions go far beyond mere regulation—they constitute **punishment**, making continued detention unconstitutional.

B. Torture, Physical Abuse, Freezing, Sleep Deprivation, and Overmedication Require Habeas Relief

Petitioner and at least **18 other detainees** provided sworn statements describing:

- Tight shackling for long hours
- Forced exposure to freezing temperatures
- Sleep deprivation
- Overmedication
- Physical and psychological abuse
- Threats and coercion
- Mock executions and intimidation
- Denial of medical care

(See Exhibits A-1T to A-18T.)

These abuses violate the **Fifth Amendment**, which protects all persons—regardless of immigration status—from:

- Torture
- Excessive force

- Deliberate indifference
- Non-accidental harm
- Dangerous conditions of confinement

See:

- *Hope v. Pelzer*, 536 U.S. 730 (2002) (shackling and unnecessary pain violate due process).
- *Kingsley v. Hendrickson*, 576 U.S. 389 (2015) (objective unreasonableness standard applies to civil detainees).
- *Farmer v. Brennan*, 511 U.S. 825 (1994) (deliberate indifference violates constitutional rights).

TCDF has repeatedly subjected Petitioner to conditions that meet the legal definition of **torture**, including physical violence, sleep deprivation, cold exposure, denial of medical treatment, and psychological coercion.

Such conditions **categorically violate** the Constitution and require habeas corpus relief.

TCDF's Deliberate Indifference to Petitioner's Serious Medical Needs Violates the Fifth Amendment

Petitioner's medical records (Exhibit 25-J) and symptom history demonstrate ongoing physical, neurological, and psychological harm directly caused by the conditions of confinement at TCDF. A review of more than ten pages of medical documentation establishes:

- **Nerve damage and reduced mobility** in Petitioner's left hand;
- **Chronic pain, numbness, and circulatory impairment;**
- Clinical symptoms consistent with **trauma, anxiety, and sleep deprivation;**
- Prescription of **18 or more medications per day**, including sedatives, without adequate medical evaluation or monitoring;
- Progressive decline in physical functioning tied directly to detention conditions, including cold exposure, shackling, and physical mistreatment.

TCDF staff have failed to provide adequate treatment or to address the underlying causes of Petitioner's deterioration. This pattern constitutes **deliberate indifference** to serious medical needs — a clear violation of the Fifth Amendment.

The Supreme Court has held that failure to provide necessary medical care to individuals in government custody violates due process:

- *Youngberg v. Romeo*, 457 U.S. 307, 321–22 (1982) (civil detainees entitled to minimally adequate care).
- *DeShaney v. Winnebago Cty.*, 489 U.S. 189, 199–200 (1989) (state has affirmative duty to protect persons in custody).
- *Kingsley v. Hendrickson*, 576 U.S. 389, 396 (2015) (objective unreasonableness standard governs treatment of civil detainees).

The extent of Petitioner’s injuries — including nerve impairment, chronic pain, sleep disorder, and overmedication — demonstrates that TCDF is **unable or unwilling** to provide constitutionally adequate medical care.

Because continued detention poses ongoing danger to Petitioner’s health and safety, habeas relief is appropriate. Courts routinely grant release where detention causes medical decline or where conditions of confinement aggravate serious health conditions.

Deliberate Indifference to Medical Needs Violates the Fifth Amendment

The December 4, 2025 complaint letter (Exhibit 25-P) also alerted the Warden to the serious medical risks Petitioner faced due to cold exposure, inadequate treatment, and continued physical decline, yet TCDF failed to take corrective measures, evidencing deliberate indifference.

C. Denial of Access to Counsel, Legal Materials, and Evidence Violated Petitioner’s Fifth Amendment Rights

1. Library Access Was Repeatedly Denied

- Petitioner submitted over **30 requests** for law library access with no response.
- Multiple detainees confirmed systemic denial of access. (Exhibits 25-A, 25-B, 25-C.)

2. Legal Books Withheld for 31 Days

Petitioner requested asylum law books on **October 30, 2025**.

They arrived **November 5**.

TCDF held them until **December 6**, after Petitioner’s hearing. (Exhibit 25-I.)

This constitutes **obstruction of access to the courts**.

3. Failure to Provide Fax and Phone to Submit Evidence

Exhibit 25-D documents that TCDF refused to deliver Petitioner’s phone or fax his documents to counsel, preventing submission of crucial evidence.

4. Constitutional Law

- *Bounds v. Smith*, 430 U.S. 817 (1977): detainees have a right to law library access or legal assistance.
- *Lewis v. Casey*, 518 U.S. 343 (1996): government may not obstruct legal preparation.
- *Agyeman v. INS*, 296 F.3d 871 (9th Cir. 2002): immigration detainees must be given meaningful opportunity to present their case.

TCDF violated all these standards.

These violations alone justify habeas relief because they **destroyed Petitioner's ability to defend his asylum claim**.

D. Interpreter Misconduct Rendered the Immigration Hearing Fundamentally Unfair

Petitioner submitted evidence that court interpreter **Daniel Saenz** rendered inaccurate, misleading, and distorted translations. (Exhibit 25-E.)

Courts have held that **improper translation violates due process**:

- *Perez-Lastor v. INS*, 208 F.3d 773, 778 (9th Cir. 2000): Interpreter errors that prevent meaningful participation invalidate proceedings.
- *He v. Ashcroft*, 328 F.3d 593, 598 (9th Cir. 2003): When the applicant cannot communicate effectively, the hearing is constitutionally defective.

Petitioner's asylum denial was based heavily on statements that were **mistranslated, misinterpreted, or incomplete**—preventing him from presenting his claim.

This is a structural due process violation requiring federal corrective relief.

E. The Immigration Judge's Written Order Contradicts His Oral Ruling and Violates Due Process

Exhibit 25-O shows that Judge Andrasko's **written decision** contradicts statements made **orally** during the hearing.

Legal principle:

"When the written order contradicts the oral ruling, due process is violated."
— *Mejia v. Sessions*, 866 F.3d 573, 592 (4th Cir. 2017)

Key Contradictions:

- The IJ orally stated that **all evidence was accepted**, but the written order claims the opposite.
- The IJ orally acknowledged **Cuba as the only removal country**, yet the written order designates **Ecuador** without evidentiary basis.
- The IJ orally recognized Petitioner's political opinion, yet the written order dismisses it.

This renders the decision **legally defective**, requiring judicial review.

F. The Removal Designation to Ecuador Was Unlawful

Under 8 U.S.C. § 1231(b)(2), DHS cannot remove a person to a country unless:

1. The country **agrees** to accept them, OR
2. Evidence supports the designation.

DHS presented **no such evidence**.

Petitioner is a **Cuban national**

VIII. RELIEF REQUESTED

For all the reasons set forth above, Petitioner respectfully requests that this Court **grant the Petition for Writ of Habeas Corpus** and order appropriate relief under 28 U.S.C. § 2241, the Fifth Amendment, and the Court's equitable authority.

Because Petitioner's detention has become **punitive, unlawful, constitutionally defective, and unsupported by any valid statutory or regulatory basis**, Petitioner seeks the following relief:

A. Immediate Release from Custody

Petitioner requests that the Court order his **immediate release** from ICE custody because:

1. His detention has become **unconstitutionally punitive**, in violation of *Bell v. Wolfish*.
2. TCDF officers subjected him to **torture, physical abuse, freezing temperatures, overmedication, food contamination, and sleep deprivation**, violating the Fifth Amendment.
3. He has been denied **access to counsel, legal materials, and the ability to prepare for court**, rendering his detention arbitrary and unlawful.

4. The **Immigration Judge's written decision** is internally inconsistent, contradictory to the oral ruling, and infected with procedural defects.
5. DHS has **no lawful country of removal** under 8 U.S.C. § 1231(b)(2).
6. Removal to Ecuador is **not legally permissible**, and Cuba has not been lawfully designated.
7. Under *Zadvydas v. Davis*, continued detention is unconstitutional because removal is **not reasonably foreseeable**.
8. Prolonged detention without meaningful review violates *Jennings v. Rodriguez*.

Immediate release is the standard remedy where the purpose of detention has failed and constitutional violations are ongoing.

B. Alternatively, Order a Bond Hearing Before a Neutral Judge

If the Court declines to order immediate release, Petitioner requests:

- A **constitutionally adequate bond hearing**,
- Before a **neutral arbiter**,
- Where DHS bears the burden of proving, by **clear and convincing evidence**, that detention is necessary.

Numerous courts have held that prolonged immigration detention without such a hearing violates due process.

C. Alternatively, Order TCDF/DHS to Remedy Constitutional Violations

If release is not immediately ordered, Petitioner requests an order requiring TCDF/ICE to:

1. **Provide immediate medical and psychological care**,
2. **Cease punitive practices**,
3. **Guarantee access to counsel**, including legal materials and law library access,
4. **Preserve all evidence**, including video footage, documents, and medical logs,
5. **Prohibit retaliatory punishment**,
6. **Provide a safe, non-punitive environment**,
7. **Allow communication with attorneys and courts**,
8. **Correct interpreter issues and ensure accurate translation in all future proceedings**,
9. **Correct the removal designation**, ensuring DHS complies with 8 U.S.C. § 1231(b)(2).

Because the conditions of confinement themselves are unconstitutional, the Court has authority to require immediate remediation or release.

D. Declare the Immigration Judge's Written Order Legally Defective

Petitioner further requests that the Court declare:

- The **written order dated November 20, 2025** (Exhibit 25-O)
- Issued by Immigration Judge Matthew Andrasko
- Is **legally defective, inconsistent with the oral ruling, unsupported by evidence, and violative of due process.**

This relief is appropriate where administrative adjudication suffers from structural and constitutional defects.

E. Enjoin Removal to Ecuador or Cuba Until Due Process Is Restored

Petitioner requests a temporary stay or injunction preventing DHS from attempting removal until:

1. Constitutional violations are remedied,
2. A lawful removal country is designated under §1231(b),
3. Petitioner's asylum and CAT claims have been **properly adjudicated without torture, coercion, or interpreter misconduct,**
4. Evidence is preserved and allowed to be presented,
5. A meaningful, non-punitive record is developed.

F. Any Other Relief the Court Deems Just and Proper

Because habeas is an equitable remedy, the Court may fashion any relief necessary to remedy the violations demonstrated in this case, including:

- Orders preserving evidence,
- Protection against retaliation,
- Oversight of TCDF compliance,
- Referral for investigation,

- Any other action required to prevent further harm.

Ecuador has **no legal basis** to receive him.

The IJ's designation violates:

- §1231(b),
- *Cardoza-Fonseca*,
- Non-refoulement principles (*Nuru v. Gonzales*),
- Due process.

Because Ecuador is not a lawful removal destination, Petitioner's detention pending removal is **legally baseless** under *Zadvydas*, making continued detention unconstitutional.

G. Prolonged Detention Without Due Process Violates *Zadvydas* and the Fifth Amendment

Petitioner has been detained for months under:

- Punitive conditions,
- Torture,
- Denial of counsel,
- Lack of medical care,
- Arbitrary removal designation,
- No realistic prospect of removal to Ecuador.

Under *Zadvydas v. Davis*, detention becomes unconstitutional when:

- removal is not reasonably foreseeable, OR
- detention no longer serves its regulatory purpose.

Here:

- Cuba is the only country with authority to accept Petitioner,
- Ecuador cannot legally take him,
- ICE has no plan or legal means to effectuate removal.

Under *Jennings v. Rodriguez*, prolonged civil detention without adequate process raises serious constitutional concerns.

Petitioner's detention is therefore **arbitrary, excessive, and unlawful**.

For the reasons set forth above, Petitioner **Rogelio Bolufe Izquierdo** respectfully submits that his continued civil detention at Torrance County Detention Facility is **unconstitutional, unlawful, and unsupported by any legitimate governmental purpose.**

Petitioner has demonstrated:

- Severe **torture, physical abuse, overmedication, and coercive mistreatment** by TCDF staff;
- Conditions that are **punitive rather than regulatory**, in violation of *Bell v. Wolfish*;
- Multiple **Fifth Amendment due process violations**, including denial of legal access, obstruction of evidence, denial of medical care, and interpreter misconduct;
- An **immigration proceeding tainted by procedural defects**, including contradictions between oral and written rulings and an unsupported removal designation;
- A lack of any **lawful country of removal** under 8 U.S.C. § 1231(b)(2);
- **Prolonged detention** without a meaningful hearing or a foreseeable removal timeline, in violation of *Zadvydas v. Davis* and *Jennings v. Rodriguez*;
- A record showing that continued detention serves no legitimate purpose and instead has become **arbitrary, excessive, and punitive.**

The Constitution does not permit civil detention to serve as punishment. Nor does it allow individuals to be subjected to torture, coercive abuse, or denial of access to courts while under the custody of the United States.

WHEREFORE, Petitioner respectfully requests that this Court:

1. **Grant the Petition for Writ of Habeas Corpus;**
2. **Order Petitioner's immediate release** from DHS custody;
3. Alternatively, order a **constitutionally adequate bond hearing** before a neutral decisionmaker;
4. Alternatively, order DHS/TCDF to **remedy unconstitutional conditions** and ensure access to counsel, medical care, legal materials, and due process;
5. Declare the Immigration Judge's written order of November 20, 2025 **legally defective**;
6. Enjoin DHS from removing Petitioner to any country until due process is restored;
7. Grant such **other and further relief** as the Court deems just, proper, and necessary.

Respectfully submitted,



Rogelio Bolufe Izquierdo

A 

Torrance County Detention Facility
P.O. Box 837
Estancia, NM 87016

CERTIFICATION OF TRANSLATION

(English-Spanish / Spanish-English)

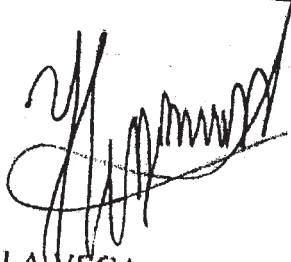
I, HAYMEL DE LA VEGA, hereby certify that I am fluent in both the English and Spanish languages, and that I am competent to translate between them.

I further certify that I have translated the attached document(s) from **Spanish into English / English into Spanish**, and that the translation is **true, complete, and accurate** to the best of my knowledge and ability.

This certification is made in accordance with the requirements of U.S. federal courts, the Board of Immigration Appeals (BIA), and the Department of Homeland Security (DHS).

Executed on this 6TH day of December, 2025.

Signature of Translator:



Name: HAYMEL DE LA VEGA

Address: 

Phone: 

Email: HDELAVEGA@EJMINSURANCE.COM