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Attorney for Petitioner
Agustinus Na,

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
SAN DIEGO, CALIFORNIA DIVISION

'25CV3805 CAB KSC

Agustinus Na, *Petitioner,* v. Joseph B. Edlow as USCIS Director; Christopher J. LaRose Sr. Warden, OMDC U.S. Immigration & Customs Enforcement (ICE), Department of Homeland Security (DHS), Kristi Noem, Secretary, Department of Homeland Security (DHS) *Respondents.*	**PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C § 2241 AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF** File No. [redacted] Detained

PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

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COMPLAINT FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

Petitioner, **Agustinus Na** ("Petitioner"), [redacted] by and through undersigned

counsel, respectfully petitions this Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241, challenging his unlawful and prolonged civil immigration detention by U.S. Immigration and Customs Enforcement ("ICE") and seeking an order requiring a constitutionally adequate bond hearing.

I. JURISDICTION AND VENUE

1.This Court has jurisdiction under **28 U.S.C. § 2241** because Petitioner is currently held in federal immigration custody within this District and challenges the legality of his detention. Petitioner has been granted **withholding of removal** under INA § 241(b)(3), a form of mandatory protection ordered by an Immigration Judge on **October 15, 2008**, which prohibits his removal to Indonesia. The Court Order for Withholding of Removal is currently in the custody of the Otay Mesa Detention Center, where the Petitioner is presently detained.

2.This Court also has federal-question jurisdiction under **28 U.S.C. § 1331**, as Petitioner's claims arise under the U.S. Constitution, the Immigration and Nationality Act ("INA"), and federal common law.

3.Venue is proper in this District pursuant to **28 U.S.C. § 1391(e)** because Petitioner is detained at the **Otay Mesa Detention Center**, which is located within this judicial district.

II. PARTIES

4.Petitioner, **Agustinus Na** (A078-019-890), is a 48-year-old native and citizen of Indonesia, born on [redacted] 1977. He entered the United States in December 1990 at the age of thirteen and has resided continuously in the United States for more than three decades. Petitioner completed his secondary education in the United States and subsequently attended UEI College, where he trained as a pharmacy technician. He has been employed in that profession continuously. Because Petitioner has received formal education in the United States since childhood, English is his primary language.

Petitioner filed an asylum application on November 17, 2005. Although asylum was denied on October 15, 2008, he was granted **withholding of removal**, recognizing that he faces a clear probability of persecution if returned to Indonesia.

Petitioner has deep and longstanding family ties in the United States, including two U.S.-born citizen daughters, a U.S. citizen father, a lawful permanent resident mother, and a U.S. citizen sibling. Despite these equities and his protected status, he is currently detained at Otay Mesa Detention Center under ICE custody. The Petitioner has close family ties to U.S. citizens and lawful permanent residents, who have submitted supporting evidence and sworn statements, as detailed in the exhibits below.

5.Respondent **Christopher J. LaRose** is the Senior Warden of Otay Mesa Detention Center and has immediate physical custody over Petitioner.

6.Respondent **U.S. Immigration and Customs Enforcement (ICE)** is the federal agency responsible for detaining Petitioner.

7.Respondent **U.S. Department of Homeland Security (DHS)** oversees the enforcement of federal immigration laws and maintains legal authority over Petitioner's detention.

8.Respondent **Secretary of Homeland Security Kristi Lynn Arnold Noem** is the head of DHS and is responsible for the administration and enforcement of immigration laws, including the authority under which Petitioner is detained.

III. STATEMENT OF FACTS

9. Petitioner and his immediate family, who are ethnically Chinese and practicing Christians, fled Indonesia to escape severe persecution, threats, and violence. Their mistreatment occurred in the context of widespread anti-Chinese and anti-Christian hostility, including government-tolerated and government-influenced attacks carried out during periods of [redacted]riots targeting Christian Chinese communities. Petitioner continues to face a substantial and well-founded. The Petitioner faces risk of harm if returned to Indonesia. risk of persecution in Indonesia. Please see statement of Petitioner, Mr. Agustinus Na, attached as Exhibit "1".

10. Petitioner appeared for his scheduled supervision appointment on November 17, 2025, at which time he was taken into the custody of U.S. Immigration and Customs Enforcement ("ICE") without prior notice. Petitioner has been granted withholding of removal pursuant to INA § 241(b)(3), a form of protection issued by an Immigration Judge on October

15, 2008. However, the Petitioner has been detained in Otay Mesa Detention Center in San Diego, California since November 17, 2025. The Order of Withholding of Removal is currently in the custody of the Otay Mesa Detention Center where the Petitioner detained.

11. Petitioner's wife, **Ms. Erita Atmadja**, has also been granted withholding of removal under INA § 241(b)(3), a status she has held since July 26, 2006. Supporting documentation, including the immigration court order granting withholding, which is submitted as Exhibits "2", "the marriage certificate, attached as Exhibit "3" and her statement, attached as Exhibit "4".

12. Petitioner is the father of twin minor daughters [redacted] both were born in Loma Linda, CA on [redacted] They are under the age of eighteen, who reside in the United States and rely on him for financial, emotional, and physical support. Petitioner's mother is a lawful permanent resident, and his father is a United States citizen. Birth certificates of the Petitioner's twin daughters are submitted as Exhibits [redacted]

13. Since Petitioner's detention on November 17, 2025, his twin daughters have suffered significant mental, physical, and financial hardship. Their statements and supporting documentation, including evidence of their strong academic and athletic performance. The statement of [redacted] is attached as Exhibit "7"; and [redacted]tatement is attached as Exhibit "8".

14. The Petitioner's twin daughters are at significant risk of long-term emotional and developmental harm if deprived of their father's presence and support. Their strong academic performance is documented in the school records of [redacted]

[redacted] Additionally, a reference letter from the twins' swimming coach, [redacted] is provided as Exhibit "11". The Petitioner's removal would have a substantial and detrimental impact on the well-being of his U.S. citizen children

15. Petitioner's father, [redacted] is a United States citizen. His naturalization certificate is submitted as an Exhibit "12".

16. The Petitioner's mother, [redacted] a lawful permanent resident of the United States, has experienced significant sleep disturbances and emotional distress since learning of her son's detention. In her written statement, attached as Exhibit 13, she describes the extreme hardship she has endured as a result of Augustinus's detention. A copy of her permanent resident card is provided as Exhibit 14.

17. Petitioner's sister, [redacted] is a United States citizen. She provided a statement testifying how hardly her brother's family especially his twin US Citizen daughters were impact. Her statement is attached as Exhibit "15", and her naturalization certificate is attached as Exhibit "16".

18. Petitioner's younger brother, [redacted] is also a United States citizen. He has indicated the strong attack to the whole family after his brother Augustinus Na was detained. The statement is attached as the Exhibit "17". His naturalization certificate is submitted as Exhibit "18".

19. Petitioner has numerous close family members who are United States citizens or lawful permanent residents. He has deep, longstanding, and overwhelmingly positive ties to the

United States. The evidence above testifies the Petitioner's strong family ties in the United States.

20. Petitioner entered the United States in December 28, 1990, at the age of thirteen as he was born on [redacted] Please refer to the Petitioner's I-94 (Exhibit "19" and her previous Passport (Exhibit "20"). He has resided continuously in the United States for more than three decades. He completed his secondary education in the United States and later attended UEI College (Exhibit "21"), where he trained as a pharmacy technician. He has been employed in that profession continuously from July 31, 2000, to the present (Exhibit "22").

21. The Petitioner has received formal education in the United States since childhood, and English is his primary language. Consequently, he lacks the linguistic, cultural, and professional capacity to obtain employment or sustain himself in Indonesia. A copy of his educational diploma from UEI College is provided as Exhibit "21". The Petitioner's family has been unable to locate his high school diploma, which was stored by the Petitioner approximately twenty-five years ago and cannot now be found. Additionally, the Petitioner's family obtained verification from the relevant licensing authority confirming that he has held a pharmacy technician license since July 31, 2000. This documentation is attached as Exhibit "22".

22. Petitioner has no criminal history, has never violated the conditions of his supervision, and has maintained consistent employment, supporting his entire household. It testifying his absence of criminal history

23. The government bears the burden of establishing by clear and convincing evidence that Petitioner poses a danger to the community. *Matter of Adeniji*, 22 I&N Dec. 1102, 1112 (BIA 1999).

24. Petitioner has had no encounters with law enforcement and no criminal issues of any kind since his entry into the United States.

25. Petitioner therefore does not pose a danger to the community, and DHS cannot meet its burden under the applicable legal standard.

26. Any attempt to remove Petitioner while he holds valid withholding of removal status would violate his due process rights under the Fifth Amendment. The government has provided no explanation or legal basis for rescinding his withholding of removal, and Petitioner has taken no action that would undermine that status.

27. Removal to a third country would likewise violate Petitioner's due process rights. Petitioner has no ties to any third country and has never consented to such removal.

28. Petitioner has been detained at the Otay Mesa Detention Center since November 2025, and his detention has become prolonged without a constitutionally sufficient hearing requiring the government to justify continued detention.

29. Petitioner has never been afforded a hearing at which ICE was required to prove, by clear and convincing evidence, that he presents a danger to the community or a flight risk.

30. Petitioner has strong incentives to appear for all immigration proceedings due to his pending asylum-related matters and his well-founded fear of returning to Indonesia.

31. Petitioner's prolonged detention is causing him significant physical, emotional, and psychological harm, exacerbated by his trauma history and the impact of separation from his family.

IV. CLAIMS FOR RELIEF

A. Petitioner's Prolonged Detention Violates the Due Process Clause of the Fifth Amendment

32. Petitioner's continued civil immigration detention, without a meaningful and individualized determination of whether his confinement is justified, violates the **Fifth Amendment's Due Process Clause.** His detention has become unreasonably prolonged, arbitrary, and punitive in nature, exceeding the constitutional limits applicable to civil, non-punitive detention.

B. The Government Has Failed to Provide a Constitutionally Adequate Custody Hearing

33. Although Petitioner received a bond hearing on December 15 at 1:30 p.m., the government failed to present **clear and convincing evidence** demonstrating that Petitioner poses a danger to the community or a flight risk. The denial of release despite the absence of such evidence renders the proceeding constitutionally inadequate and violates the **Due Process Clause**, as well as established constitutional principles governing civil immigration detention.

C. Detention Is Unlawful Because Petitioner Cannot Be Removed to Indonesia

34. Petitioner has been granted **withholding of removal** under INA § 241(b)(3), which legally prohibits DHS from removing him to Indonesia. Because removal to Indonesia is not

legally permissible and is not reasonably foreseeable, continued detention lacks statutory authority and violates due process.

D. Removal to a Third Country Would Violate Due Process

35. Petitioner has no ties to any third country and has never consented to removal to a third country. Any attempt to remove him to a country other than Indonesia would violate the **Due Process Clause**, as such removal would be arbitrary, unsupported by law, and inconsistent with the protections afforded by his withholding of removal.

VI. CONCLUSION

Petitioner's continued civil immigration detention—despite his long-standing residence in the United States, his extensive family ties, his lack of any criminal history, and his protected status under withholding of removal—has become unreasonably prolonged and lacks any lawful justification. The government has failed to provide a **constitutionally adequate custody hearing**, has not met its burden to demonstrate by clear and convincing evidence that Petitioner poses a danger or flight risk, and is legally prohibited from removing him to Indonesia.

Because Petitioner's detention is now arbitrary, punitive, and unsupported by any legitimate governmental interest, habeas relief is warranted. Petitioner therefore respectfully requests that this Court grant the relief sought in his Petition and order his immediate release, or, in the alternative, require a constitutionally compliant bond hearing.

For the foregoing reasons, Petitioner respectfully requests that this Court issue the writ and order a bond hearing or immediate release.

Dated: December 24, 2025

Respectfully submitted,

LUM LAW GROUP

Albert Justin Lum
Attorney 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 the petitioner because I am the petitioner's attorneys. I have discussed with the petitioners the event described in the Petition. Based on those discussions, I hereby verify that the statements made in the attached Petition for the Writ of Habeas Corpus are true and correct to the best of my knowledge.

Date December 24, 2025

/s/ Albert Justin Lum
Albert Justin Lum

Exhibit

"1"

STATEMENT OF AGUSTINUS

I, Agustinus Na, declare as follows:

I have lived in this country for thirty-five years. During those years, I have met and married my wife, had two beautiful children, and built a fulfilling career here. I am a hardworking, dedicated, and law-abiding person. I have never been arrested, charged with any crime, or have violated any laws. Every year, I file my federal and state taxes and follow all United States regulations.

I am the primary financial provider for my family of four– my wife and our two children. I worked the night shift full time to support our needs, including rent, food, education, our children's extracurricular activities, health and car insurance, home utilities, and other essential expenses to ensure our safety and stability. My two children depend on me emotionally, mentally, and financially to help support them throughout their education and life experiences. My wife works a part-time job; therefore, cannot sufficiently provide for our family independently. If I am deported, my family will face extreme hardship. My wife will not be able to provide for herself and our children alone. They would struggle without my presence, guidance, and support.

Furthermore, I am deeply afraid to return to my home country due to the persecution I previously suffered there, and I genuinely fear for my life if I am forced to go back. For the same reasons, I am also fearful of being deported to a third country. I have no legal status, family, employment opportunities, or support network in any third country. Also, I am terrified I would be vulnerable to being targeted or harmed, especially given the circumstances that led to my withholding of removal.

My only goal is to continue working, supporting my family, and raising my two children safely. I respectfully ask for protection so I can remain with my family.

I declare under penalty of perjury that the above is true and correct.

Signed:

Date: 11/24/25

Exhibit

"2"

IMMIGRATION COURT
[illegible] SOUTH GLIFF ST 15TH FL
LOS ANGELES, CA 90014

In the Matter of
[illegible], DRITA
Respondent

Case No [redacted]

In Removal Proceedings

ORDER OF THE IMMIGRATION JUDGE

This is a summary of the oral decision entered [illegible] Jul 26, 2006
This memorandum is solely for the convenience of the parties. If the proceedings should be appealed or reopened, the oral decision will become the official opinion in the case.

[X] The respondent was ordered removed from the United States to any country [illegible]
or in the alternative to
[ ] Respondent's application for voluntary departure was denied and respondent was ordered removed to
or in the alternative to
[ ] Respondent's application for voluntary departure was granted until upon posting a bond in the amount of $ _____
with an alternate order of removal to

Respondent's application for
[X] Asylum was ( ) granted (X) denied ( ) withdrawn
[X] Withholding of removal was ( ) granted ( ) denied ( ) withdrawn
[ ] A Waiver under Section ____ was ( ) granted ( ) denied ( ) withdrawn
[ ] Cancellation under Section 240A(a) was ( ) granted ( ) denied ( ) withdrawn

Respondent's application for:
[ ] Cancellation under Section 240A(b)(1) was ( ) granted ( ) denied ( ) withdrawn. If granted it is ordered that the respondent be issued all appropriated documents necessary to give effect to this order.
[ ] Cancellation under Section 240A(b)(2) was ( ) granted ( ) denied ( ) withdrawn. If granted it is ordered that the respondent be issued all appropriated documents necessary to give effect to this order.
[ ] Adjustment of Status under Section ____ was ( ) granted ( ) denied ( ) withdrawn. If granted it is ordered that the respondent be issued all appropriated documents necessary to give effect to this order.
[ ] Respondent's application of ( ) withholding of removal ( ) deferral of removal under Article III of the Convention Against Torture was ( ) granted ( ) denied ( ) withdrawn.
[ ] Respondent's status was rescinded under section 246.
[ ] Respondent is admitted to the United States as a _____ until _____.
[ ] As a condition of admission, respondent is to post a $ _____ bond.
[ ] Respondent knowingly filed a frivolous asylum application after proper notice.
[ ] Respondent was advised of the limitation or discretionary relief for failure to appear as ordered in the Immigration Judge's oral decision.
[ ] Proceedings were terminated.
[ ] Other: _____

Date: Jul 26, 2006

DOROTHY DUNKEL-BRADLEY
Immigration Judge

Appeal: Waived/Reserved Appeal Due By

Jlw

Exhibit

"3"

STATE OF CALIFORNIA

CERTIFICATION OF VITAL RECORD

County of San Bernardino

DIVISION OF VITAL RECORDS

222 WEST HOSPITALITY LANE, SAN BERNARDINO, CALIFORNIA 92415-0022

STATE FILE NUMBER

LICENSE AND CERTIFICATE OF MARRIAGE

MUST BE LEGIBLE-MAKE NO ERASURES, WHITEOUTS, OR OTHER ALTERATIONS

[redacted]

LOCAL REGISTRATION NUMBER

GROOM PERSONAL DATA

1A. NAME OF GROOM–First (Given)	1B. MIDDLE	1C. LAST (FAMILY)	2. DATE OF BIRTH–Month, Day, Year
AGUSTINUS	--	NA	[redacted] 1977

3A. RESIDENCE–STREET AND NUMBER	3B. CITY	3C. ZIP CODE	3D. COUNTY–Outside California, Enter State	4. STATE OF BIRTH
[redacted]	SAN BERNARDINO	92354	SAN BERNARDINO	INDONESIA

5. MAILING ADDRESS–IF DIFFERENT	6. NUMBER OF PREVIOUS MARRIAGES	7A. LAST MARRIAGE ENDED BY:	7B. DATE–Month, Day, Year
--	0	☐ DEATH ☐ DISSOLUTION ☐ ANNULMENT	--/--/----

8A. USUAL OCCUPATION	8B. USUAL KIND OF BUSINESS OR INDUSTRY	9. EDUCATION–YEARS COMPLETED
PHARMACY TECH.	PHARMACY	12

10A. FULL NAME OF FATHER	10B. STATE OF BIRTH	11A. FULL MAIDEN NAME OF MOTHER	11B. STATE OF BIRTH
[redacted]	INDONESIA	[redacted]	INDONESIA

BRIDE PERSONAL DATA

12A. NAME OF BRIDE–First (Given)	12B. MIDDLE	12C. CURRENT LAST (FAMILY)	12D. MAIDEN LAST (FAMILY) IF DIFFERENT	13. DATE OF BIRTH–Month, Day, Year
[redacted]	--	[redacted]	--	[redacted] 1981

14A. RESIDENCE–STREET AND NUMBER	14B. CITY	14C. ZIP CODE	14D. COUNTY–Outside California, Enter State	15. STATE OF BIRTH
[redacted]	GARDEN GROVE	92840	LOS ANGELES	INDONESIA

16. MAILING ADDRESS–If Different	17. NUMBER OF PREVIOUS MARRIAGES	18A. LAST MARRIAGE ENDED BY:	18B. DATE–Month, Day, Year
--	0	☐ DEATH ☐ DISSOLUTION ☐ ANNULMENT	--/--/----

19A. USUAL OCCUPATION	19B. USUAL KIND OF BUSINESS OR INDUSTRY	20. EDUCATION–YEARS COMPLETED
COUNTER HELPER/CASHIER	FAST FOOD RESTAURANT	12

21A. FULL NAME OF FATHER	21B. STATE OF BIRTH	22A. FULL MAIDEN NAME OF MOTHER	22B. STATE OF BIRTH
[redacted]	INDONESIA	[redacted]	INDONESIA

AFFIDAVIT

We the undersigned an unmarried man and an unmarried woman state that the foregoing information is true and correct to the best of our knowledge and belief, that no legal objection to the marriage nor to the issuance of a license is known to us, and hereby apply for a License and Certificate of Marriage.

23. SIGNATURE OF GROOM ▸ [redacted]

24. SIGNATURE OF BRIDE ▸ [redacted]

LICENSE TO MARRY

AUTHORIZATION AND LICENSE IS HEREBY GIVEN TO ANY PERSON DULY AUTHORIZED BY THE LAWS OF THE STATE OF CALIFORNIA TO PERFORM A MARRIAGE CEREMONY WITHIN THE STATE OF CALIFORNIA TO SOLEMNIZE THE MARRIAGE OF THE ABOVE NAMED PERSONS. REQUIRED CONSENTS FOR THE ISSUANCE OF THIS LICENSE ARE ON FILE.

25A. ISSUE DATE Month, Day, Year	25B. LICENSE EXPIRES AFTER Month, Day, Year	25C. LICENSE NUMBER	25D. COUNTY OF ISSUE
08/01/2001	10/30/2001	[redacted]	SAN BERNARDINO
		25E. NAME OF COUNTY CLERK	25F. SIGNATURE OF DEPUTY CLERK (IF APPLICABLE)
		LARRY WALKER	▸ L. Aguilera DEPUTY

WITNESS(ES) (ONE REQUIRED)

26A. SIGNATURE OF WITNESS	26B. RESIDENCE–Street and Number	26C. CITY, STATE, AND ZIP
▸ [redacted]	[redacted]	CA- 92354 SAN BERNARDINO
27A. SIGNATURE OF WITNESS		27C. CITY, STATE, AND ZIP
▸ [redacted]		CA 92354 San Bernardino

CERTIFICATION OF PERSON SOLEMNIZING MARRIAGE

28. I hereby certify that the above-named man and woman were joined by me in marriage in accordance with the laws of the State of California.

ON 8 (MONTH) 1 (DAY) 2001 (YEAR)

AT SAN BERNARDINO (CITY OR TOWN) SAN BERNARDINO, (COUNTY) CALIFORNIA

29A. SIGNATURE OF PERSON SOLEMNIZING MARRIAGE	29B. RELIGIOUS DENOMINATION (If Clergy)
▸ Cynthia L. Ramirez	
29C. NAME OF PERSON SOLEMNIZING MARRIAGE (TYPE OR PRINT)	29D. OFFICIAL TITLE
CYNTHIA L. RAMIREZ	DEPUTY COMM. OF CIVIL MARRIAGES
29E. MAILING ADDRESS	29F. ZIP CODE
222 W HOSPITALITY LN SAN BERNARDINO, CA	92415

LOCAL REGISTRAR OF MARRIAGES (COUNTY RECORDER)

30A. SIGNATURE OF LOCAL REGISTRAR	30B. SIGNATURE OF DEPUTY (If Applicable)	31. DATE ACCEPTED FOR REGISTRATION
▸ LARRY WALKER	BY ▸ L. Aguilera	08/01/2001

716137

AUG 01 2001

DATE ISSUED

Larry Walker

LARRY WALKER
Auditor/Controller-Recorder

This copy not valid unless prepared on engraved border displaying seal and signature of Recorder.

ANY ALTERATION OR ERASURE VOIDS THIS CERTIFICATE

Exhibit

"4"

To whom it may concerns,

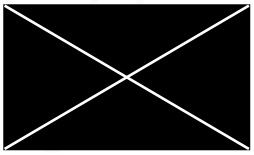
My name is [redacted] I am the wife of Agustinus Na who is currently detained by ICE. We have been married for 24 years and have two 17 year old U.S. citizen daughters. My husband has lived in the United States for more than 30 years. This is his home. He has always worked hard, paid taxes, supported our family, and positively contributed to the community. He has no criminal record, no history of violence, and no danger to anyone. For these reasons, I would like to express my support for my husband's release from detention.

My husband is the primary financial provider for our family. He works long hours to support us financially. Without him, we cannot meet our basic living expenses. With my limited income, it's impossible to support the household alone. His income enabled us to have a place to live and all the basic amenities we needed. He provides what we need for the kitchen so that we can have food on our table. He paid for our health insurances to ensure our health-care. He paid for our children's club swim team expenses and makes sure we spend quality time as a family by planning and taking us on family trips such as hiking, camping, or visiting new towns.

Our children depend on their father a lot and are especially in need of their father during their final year in high school as they start to prepare for life outside of home and in college. He takes them to school everyday even when he comes home from work tired and helps them when they have difficulty understanding some school assignments. He makes sure that our children have what they need for home and for school. My husband's involvement in the house has positively influenced our children by teaching them how to be independent with basic life skills such as cooking and cleaning. He is one of the biggest supporters of their extracurriculars, especially swimming. By constantly showing up for their swim meets and giving them advice, my husband's competitive attitude continues to motivate my children and I am afraid that if he is away, my daughter will not be able to succeed. Therefore, at this time, our children need their father the most as they are getting ready for college and the world ahead of them.

I'm doing everything I can to support our children, but without my husband I am overwhelmed and afraid for our future. The emotional, financial, and practical day to day responsibilities are too much for me to manage alone. My children's and my own well-being are suffering. Please allow my husband to be released and be home with his family.

Thank you for your consideration.
Sincerily



Exhibit

"5"

STATE OF CALIFORNIA

CERTIFICATION OF VITAL RECORD

COUNTY of SAN BERNARDINO

DEPARTMENT OF PUBLIC HEALTH

351 N. MT. VIEW AVENUE, SAN BERNARDINO, CALIFORNIA 92415-0010

CERTIFICATE OF LIVE BIRTH

STATE OF CALIFORNIA

USE BLACK INK ONLY

STATE FILE NUMBER [redacted]

CHILD

1A. NAME OF CHILD - FIRST	1B. MIDDLE	1C. LAST
[redacted]	-	NA

2. SEX	3A. THIS BIRTH, SINGLE, TWIN, ETC.	3B. IF MULTIPLE, THIS CHILD 1ST, 2ND, ETC.	4A. DATE OF BIRTH - MM/DD/CCYY	4B. HOUR - 24 HOUR CLOCK TIME
FEMALE	TWIN	2ND	[redacted]2008	0606

PLACE OF BIRTH

5A. PLACE OF BIRTH - NAME OF HOSPITAL OR FACILITY	5B. STREET ADDRESS - STREET AND NUMBER, OR LOCATION
LOMA LINDA UNIVERSITY MED CTR	11234 ANDERSON
5C. CITY	**5D. COUNTY**
LOMA LINDA	SAN BERNARDINO

FATHER/PARENT

6A. NAME OF FATHER/PARENT - FIRST	6B. MIDDLE	6C. LAST	7. BIRTHPLACE - STATE/ COUNTRY	8. DATE OF BIRTH - MM/DD/CCYY
AGUSTINUS	-	NA	INDONESIA	[redacted]1977

MOTHER/PARENT

9A. NAME OF MOTHER/PARENT - FIRST	9B. MIDDLE	9C. LAST - BIRTH NAME	10. BIRTHPLACE - STATE/ COUNTRY	11. DATE OF BIRTH - MM/DD/CCYY
[redacted]	-	[redacted]	INDONESIA	[redacted]1981

INFORMANT AND BIRTH CERTIFICATION

I CERTIFY THAT I HAVE REVIEWED THE STATED INFORMATION AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.	12A. PARENT OR OTHER INFORMANT - SIGNATURE [redacted]	12B. RELATIONSHIP TO CHILD PARENT	12C. DATE SIGNED - MM/DD/CCYY 01/20/2008
I CERTIFY THAT THE CHILD WAS BORN ALIVE AT THE DATE, HOUR, AND PLACE STATED.	13A. ATTENDANT/CERTIFIER - SIGNATURE AND DEGREE OR TITLE Jan A Wingo Birth Clerk	13B. LICENSE NUMBER G056066	13C. DATE SIGNED - MM/DD/CCYY 01/20/2008
13D. TYPED NAME, TITLE AND MAILING ADDRESS OF ATTENDANT TERESA P AVANTS,MD,LOMA LINDA MED CTR,		14. TYPED NAME AND TITLE OF CERTIFIER IF OTHER THAN ATTENDANT JAN WINGO, BIRTH CLERK	

LOCAL REGISTRAR

15A. DATE OF DEATH - MM/DD/CCYY	15B. STATE FILE NO. - STATE USE ONLY	16. LOCAL REGISTRAR - SIGNATURE	17. DATE ACCEPTED FOR REGISTRATION - MM/DD/CCYY
		MARGARET M. BEED, MD	01/24/2008

CERTIFIED COPY OF VITAL RECORDS

STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO } SS

DATE ISSUED Feb 12, 2008

Margaret M Beed MD

This is a true and exact reproduction of the document officially registered and placed on file in the VITAL RECORDS SECTION, SAN BERNARDINO DEPARTMENT OF PUBLIC HEALTH.

ERIC FRYKMAN, M.D.
COUNTY HEALTH OFFICER
REGISTRAR OF VITAL STATISTICS

0 0 1 7 4 1 9 5 7

This copy not valid unless prepared on engraved border displaying seal and signature of Registrar.

THE GREAT SEAL OF THE STATE OF CALIFORNIA EUREKA

Exhibit

"6"

STATE OF CALIFORNIA

CERTIFICATION OF VITAL RECORD

COUNTY of SAN BERNARDINO

DEPARTMENT OF PUBLIC HEALTH
351 N. MT. VIEW AVENUE, SAN BERNARDINO, CALIFORNIA 92415-0010

CERTIFICATE OF LIVE BIRTH
STATE OF CALIFORNIA
USE BLACK INK ONLY

STATE FILE NUMBER

[redacted]
LOCAL REGISTRATION NUMBER

CHILD

1A. NAME OF CHILD - FIRST	1B. MIDDLE	1C. LAST
[redacted]	-	NA

2. SEX	3A. THIS BIRTH, SINGLE, TWIN, ETC.	3B. IF MULTIPLE, THIS CHILD 1ST, 2ND, ETC.	4A. DATE OF BIRTH - MM/DD/CCYY	4B. HOUR - 24 HOUR CLOCK TIME
FEMALE	TWIN	1ST	[redacted]2008	0605

PLACE OF BIRTH

5A. PLACE OF BIRTH - NAME OF HOSPITAL OR FACILITY	5B. STREET ADDRESS - STREET AND NUMBER, OR LOCATION
LOMA LINDA UNIVERSITY MED CTR	11234 ANDERSON

5C. CITY	5D. COUNTY
LOMA LINDA	SAN BERNARDINO

FATHER/PARENT

6A. NAME OF FATHER/PARENT - FIRST	6B. MIDDLE	6C. LAST	7. BIRTHPLACE - STATE/COUNTRY	8. DATE OF BIRTH - MM/DD/CCYY
AGUSTINUS	-	NA	INDONESIA	[redacted]977

MOTHER/PARENT

9A. NAME OF MOTHER/PARENT - FIRST	9B. MIDDLE	9C. LAST - BIRTH NAME	10. BIRTHPLACE - STATE/COUNTRY	11. DATE OF BIRTH - MM/DD/CCYY
[redacted]	-	[redacted]	INDONESIA	[redacted]/1981

BIRTH CERTIFICATION INFORMANT AND ATTENDANT

I CERTIFY THAT I HAVE REVIEWED THE STATED INFORMATION AND THAT IT IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE.	12A. PARENT OR OTHER INFORMANT - SIGNATURE [redacted]	12B. RELATIONSHIP TO CHILD PARENT	12C. DATE SIGNED - MM/DD/CCYY [redacted]2008
I CERTIFY THAT THE CHILD WAS BORN ALIVE AT THE DATE, HOUR, AND PLACE STATED.	13A. ATTENDANT/MIDWIFE - SIGNATURE AND DEGREE OR TITLE Jan B Wingo Birth Clerk	13B. LICENSE NUMBER G056066	13C. DATE SIGNED - MM/DD/CCYY [redacted]2008
13D. TYPED NAME, TITLE AND MAILING ADDRESS OF ATTENDANT TERESA P AVANTS,MD,LOMA LINDA MED CTR		14. TYPED NAME AND TITLE OF CERTIFIER IF OTHER THAN ATTENDANT JAN WINGO, BIRTH CLERK	

LOCAL REGISTRAR

15A. DATE OF DEATH - MM/DD/CCYY	15B. STATE FILE NO. - STATE USE ONLY	16. LOCAL REGISTRAR - SIGNATURE	17. DATE ACCEPTED FOR REGISTRATION - MM/DD/CCYY
		MARGARET M BEED, MD	01/24/2008

CERTIFIED COPY OF VITAL RECORDS

STATE OF CALIFORNIA
COUNTY OF SAN BERNARDINO } SS

DATE ISSUED Feb 12, 2008

Margaret M Beed MD

This is a true and exact reproduction of the document officially registered and placed on file in the VITAL RECORDS SECTION, SAN BERNARDINO DEPARTMENT OF PUBLIC HEALTH.

ERIC FRYKMAN, M.D.
COUNTY HEALTH OFFICER
REGISTRAR OF VITAL STATISTICS

0 0 1 7 4 1 9 5 6

This copy not valid unless prepared on engraved border displaying seal and signature of registrar.

THE GREAT SEAL OF THE STATE OF CALIFORNIA EUREKA

Exhibit

"7"

To Whom It May Concern.

My name is [redacted] and I am proud to offer my support to Augustinus Na to whom I've known for all my 17 years of life as my father.

My dad doesn't tell the family he provides; he shows it. Even after a long day of work, I can always count on him to prepare a warm homemade meal after I come home from school or swim practice. Without having to ask, he is always buying me, my mom, and my sister our favorite snacks from the grocery store. As the main provider, my dad pays for the majority of living expenses, working every other week for 7 days, leaving at around 8:00 pm and coming home at 7:00 am. Despite working long shifts, he still makes time for me and my sister by taking us to school every day and occasionally taking days off to attend our swim meets and academic events.

His unwavering support encourages me to achieve the most in every field, including my 13-year swim career. I still remember my dad standing outside across the pool in the pouring rain, cheering his heart out for my 30-second race. He is the reason why all club swim expenses are paid off, why I have one of the highest practice attendances out of the team, and why I give it my all in every race, no matter the weather.

My father inspires me through my academic journey as well. He has taught me important morals and plays a huge role in supporting and molding the person I want to be when I grow up. Without his aid and role model attitude, I would have never taken advantage of all the academic opportunities my school offers, such as AP/honors classes, clubs, and language classes. Additionally, his demonstration of consistent hard work motivates me to maintain good grades and hold myself to a high standard. Because of him, I can proudly say I have a 4.5 weighted GPA, currently ranked 26th out of 499 in my class, and intend to pursue a career in architecture at a 4-year college.

He was there for all the pivotal moments in my life. Whether it was my birthday or a challenging day at practice, he stood by my side. One significant occasion was when I was accepted into a French language and culture study abroad program in Paris, earning an 80% scholarship. My father was eager to step in and cover part of the remaining expenses and even helped me organize a fundraiser to cover the rest of my tuition and flight costs. His support was instrumental in making that summer one of the most transformative experiences of my life.

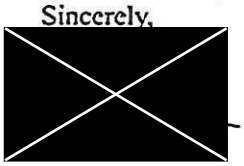
On the day he was detained, I returned from school feeling crushed to find thawed bacon and fresh mustard greens left on the cold kitchen counter, waiting to be cooked. Since he left, my sister has to pick up extra hours at her lifeguarding job just to cover our daily expenses, and we might have to give up our membership with the Redlands Swim Team next month because we simply can't afford it. Although I earned my California Seal of Biliteracy in French on

November 19th, I couldn't shake the dread that my father, who played such a significant role in my language journey, wasn't there to witness my achievement. On top of this, the pressure of college applications adds a heavy burden to my twin sister and me during an already difficult time. These are just a few examples of how my father's absence has tied my family in knots we can't unwind.

Since my father's detainment, I have lost not just my provider but also my biggest supporter and lifelong role model. As his daughter and a US citizen, I firmly believe that Agustinus Na embodies all the qualities of a truly supportive and dedicated individual. Granting him a green card would not only benefit him immensely but also positively impact his community. It is my privilege to advocate for him in this letter of support, and I sincerely hope it reaches you well.

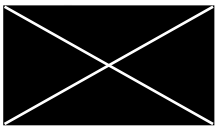
I swear that the foregoing is true and correct to the best of my knowledge and recollection.

Thank you for your consideration,
Sincerely,



Exhibit

"8"



Current Date: November 22, 2025

To whom it may concern,

My name is [redacted] and I am one of Augusinus Na's two daughters to whom I have known for all of my 17 years of life. As a United States citizen and proud daughter, I am in full support of my father's release as he is a crucial part of my family's and I's lives financially, physically, and emotionally.

Before my father's recent incarceration, he worked long night shifts as a Pharmacy Technician while my sister and I were sleeping to cover almost all of our living expenses. Thus, he would often take extra hours in order to pay for both my sister's and I's monthly swim club expenses and swim meets which have totaled up to over $200 dollars each in some months. On top of being the main provider for our family, my father takes the time to drive my sister and I to school every morning despite being exhausted after working all night, makes sure to cheer us on at all of our swim meets, and stays up to make us food whenever he can. No matter the circumstances, my father has always made the time and effort to make sure we could live comfortable lives. However, since my father has been taken away from us, our stable household has been threatened and all these costs and responsibilities have been piled over my overwhelmed mother. My mother is also not a U.S. citizen and, with her low income, we are struggling to pay rent, groceries, utility bills, and other basic needs. Just like everyone else in the family, my mother fell under tremendous stress and fear for our future. I have been extremely worried for her health and well being because of all the pressure that has been placed upon her. Though I have been trying to earn extra money through my lifeguarding job, I can only work so many hours between school, practice, college applications, and house chores. Even with my help, I fear that the cost of basic living is too expensive for my mother's and I's wages.

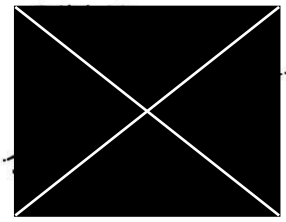
My father has also played a large role in shaping me to be the independent, driven, and compassionate person I am today. I miss hearing his loud screams of encouragement during swim events and long monologues of advice whenever we did not do our best after tough practices. I often suffer from anxiety from tests and workload and my father never fails to remind me to never sell myself short. He has always encouraged me to follow my dreams and to give my all into anything I do. Because of him, I am ranked 38th out of 499 in my class with a 4.47 GPA and have excelled in a total of 11 AP courses. In particular, I was skeptical of taking AP Spanish Language and Culture in my senior year because I had doubts of being able to pass the class. However, my father pushed me to take the class, leading me to earn my California Seal of Biliteracy for passing 4 years of language. On top of that, I have earned spots in CIF division 2 finals and won first place in league for relays and individual events in high school swimming. Without my father pushing me to become the best version of myself everyday, many of the things that I have achieved and the impactful decisions I have made would have never existed. This is especially true with me and my sister entering a crucial time in our lives as we start applying for college and start to think about our futures after high school. I have never been under so much stress that without my father's emotional support, I will fail to prevail through the new changes and challenges that await me.

My father is one of my biggest role models as well. He shows compassion and empathy to those in his community by participating in triathlons/marathons with coworkers and volunteering at our swim meets. Through his job in Loma Linda University Hospital, he has made many lifelong relationships with those that would be just as devastated by his detention. I have had a built-in mentor for all my life because of his hard work ethic and empathy for those who work just as hard as him.

Without my father beside me, I have been trying to stay strong but I cannot help to admit that his absence has taken an immense toll on my academic motivation, athletic performance, and mental well being. Everyday my family and I struggle to maintain a stable life as we are juggling home expenses and the mourning of my father being detained. With that, it is with my full heart that I know that my father, Agustinus Na, is more than deserving of being granted a green card and released from his incarceration. As his daughter, it is my honor to provide this letter of support for him and I hope it finds you well.

I swear that the foregoing is true and correct to the best of my knowledge and recollection.

Thank you for your time and consideration,
Sincerely,



Exhibit

"9"

SUMMER 2025

CERTIFICATE OF COMPLETION

HIGH SCHOOL SUMMER ABROAD

French Language & Culture in Paris, France

ciee GLOBAL NAVIGATOR High School Study Abroad

This certificate is proudly presented to

[redacted]

Language Level
Level 2
Intermediate Mid / Intermediate High

Language Course Grade
A

Instructional Hours
60 Hours

Matthew Redman, Vice President
Global Navigator High School Study Abroad

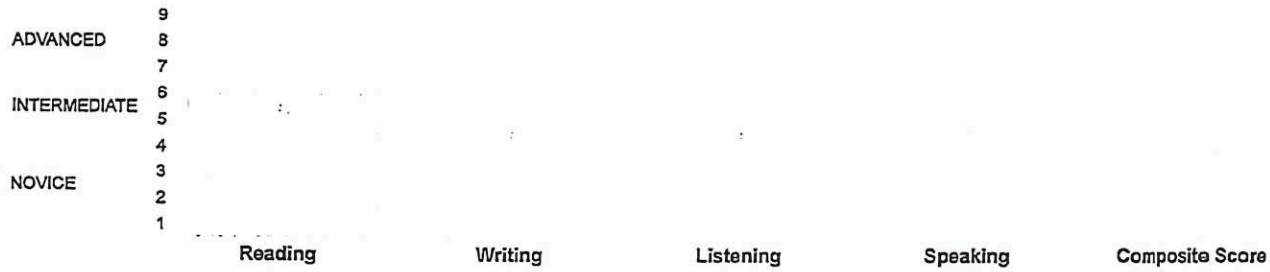
Katie Gallegos, Director of Curriculum
Global Navigator High School Study Abroad

7/14/25, 3:55 PM [redacted] Avant | Class Report

avant STAMP 4S Report

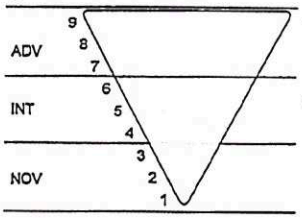
CIEE | France, Paris

Login Name: [redacted] **Language:** French **Start Date:** July 03, 2025



READING

6 INTERMEDIATE HIGH



LEVEL DESCRIPTION

At this level, learners are able to:

- read and comprehend longer texts such as short stories and descriptive texts, and understand the main ideas and most details.
- guess the meaning of many new words from context in unfamiliar texts.

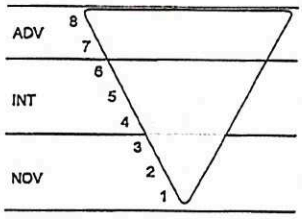
SUGGESTIONS

Suggestions to 'Power Up' to the next level:

- practice reading a variety of extended texts such as detailed narratives, descriptions, and historical accounts that include opinions.
- identify applications that focus on word games and puzzles and use these on a regular basis to build vocabulary.
- ***For Latin:** focus on reading more complicated inscriptions and short stories and expand your reading into unfamiliar topics.

WRITING

5 INTERMEDIATE MID



LEVEL DESCRIPTION

At this level, learners are able to:

- create enough language to show groupings of ideas, which are loosely connected using some transition words.
- describe experiences and events in everyday life at home, school and in the community.
- include some basic reasons and explanations with some complex sentences.

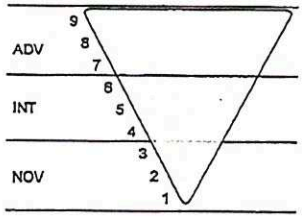
SUGGESTIONS

Suggestions to 'Power Up' to the next level:

- focus on increasing the amount of language that you produce, adding more details, more complex language and a variety of sentences to create a bigger and clearer picture.
- focus on using less common vocabulary.
- focus on using a variety of transitions, linking and connecting words.

LISTENING

5 INTERMEDIATE MID



LEVEL DESCRIPTION

At this level, learners are able to:

- understand main points in conversations and presentations on familiar topics encountered in work, school, and leisure, delivered through a series of sentences.
- understand the main points of radio or TV programs on current affairs or topics of high interest when the delivery is relatively slow and clear.

SUGGESTIONS

Suggestions to 'Power Up' to the next level:

- practice listening to longer, more detailed audio passages such as news reports, music and audio books.
- use focused listening strategies to identify the main points and supporting details of the audio passages.

SPEAKING

5 INTERMEDIATE MID

LEVEL DESCRIPTION

At this level, learners are able to:

- create language that shows groupings of ideas, which are loosely connected using some transition words.
- describe experiences and events in everyday life at home, school and in the community.

SUGGESTIONS

Suggestions to 'Power Up' to the next level:

- focus on linking thoughts and ideas together using more complex language and linking strategies.
- focus on using less common vocabulary.
- identify a speaking partner who is able to give you feedback and that you can speak with on a daily basis.

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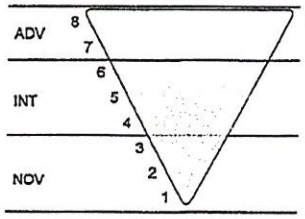

- show increased fluency and control of some complex language, with accurate pronunciation.

avant STAMP 4S Report

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Student Score Report

AP CollegeBoard

Report Date: 11/22/2025

[redacted]

AP ID/AP Number: [redacted] **School:** [redacted]

Year taken	Name of exam	Score
2025	Calculus BC	5
	- Subscore: Calculus AB Subscore	5
2025	English Language and Composition	3
2025	Physics C: Mechanics	4
2025	United States History	5
2024	2-D Art and Design	5
2024	Precalculus	5

Awards

2025	AP Scholar with Distinction

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American Red Cross
Training Services

Certificate of Completion

[redacted]

has successfully completed requirements for

Lifeguarding (Including Deep Water) with CPR/AED for Professional Rescuers and First Aid

Date Completed: 3/26/2024
Validity Period: 2 Years

Conducted by: American Red Cross

AMERICAN RED CROSS TRAINING SERVICES

To verify certificate, scan code or visit redcross.org/digitalcertificate and enter ID.

Learn and be inspired at LifesavingAwards.org

01G2SLG

CollegeBoard

National Recognition Program

[redacted]

For Outstanding Academic Achievement

First-Generation Recognition Award
School Recognition Award

August 19th, 2025
Awarded on

COLLEGE BOARD · NATIONAL RECOGNITION PROGRAM

David Coleman
Chief Executive Officer
The College Board

AP®

[redacted]

has earned the

AP® Scholar with Distinction Award

for achieving an average score of at least 3.5 on all AP Exams taken, and scores of 3 or higher on five or more exams.

David Coleman, *CEO, College Board*

Trevor Packer, *Senior Vice President, AP and Instruction*

July 03, 2025

Exhibit

"10"

AP

[redacted]

has earned the

AP® Scholar with Distinction Award

for achieving an average score of at least 3.5 on all AP Exams taken, and scores of 3 or higher on five or more exams.

David Coleman, *CEO, College Board*

Trevor Packer, *Senior Vice President, AP and Instruction*

July 03, 2025

American Red Cross

American Red Cross

Certificate of Completion

[redacted]

has successfully completed requirements for

Lifeguarding (Including Deep Water) with CPR/AED for Professional Rescuers and First Aid

conducted by
Loma Linda University Drayson Center

Date Completed: **03/26/2024**
Valid Until: **03/26/2026**

Instructors: Nicholas Van Hemert

Certificate ID: 01G2FM3

To verify, scan code or visit: https://www.redcross.org/take-a-class/qrcode?certnumber=01G2FM3

CollegeBoard

National Recognition Program

[redacted]

For Outstanding Academic Achievement

First-Generation Recognition Award
School Recognition Award

August 19th, 2025
Awarded on

David Coleman
Chief Executive Officer
The College Board

Student Score Report

AP CollegeBoard

Report Date: 11/22/2025

[redacted]

AP ID/AP Number: [redacted] **School:** [redacted]

Year taken	Name of exam	Score
2025	Calculus BC	5
	- Subscore: Calculus AB Subscore	5
2025	Physics C: Mechanics	3
2025	United States History	4
2024	2-D Art and Design	5
2024	Precalculus	5

Awards	
2025	AP Scholar with Distinction

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Exhibit

"11"

[redacted]

To Whom It May Concern,

My name is [redacted] Head Coach of Redlands High School Swimming, and I am honored to write this letter on behalf of [redacted] and their father, Agustinus Na. Coaching the Na sisters has allowed me to watch two remarkable young women develop into mature leaders who positively influence everyone around them. [redacted] lead with consistency, kindness, academic discipline, and a quiet confidence that sets the tone for the entire team.

Their leadership and character come from the strong foundation built at home. Their father plays a central role in shaping who they have become. The compassion they show others, the responsibility they bring to their commitments, and the humility they demonstrate every day reflect the values he has modeled throughout their lives.

Agustinus has always made sure his daughters feel fully part of the Redlands High School team. He consistently provides the gear they need including suits, caps, goggles, and team apparel so they feel prepared, confident, and connected to the program. This support is more meaningful than it may appear on the surface. When athletes feel like they belong, when they have the tools they need, and when they know their family supports their involvement, it strengthens their confidence and their sense of identity within the team.

His influence extends beyond material support. Agustinus is a positive and steady presence at meets, always willing to help and always encouraging the girls to do their best. He models respect, kindness, and responsibility, and the girls mirror these qualities in how they treat their teammates and how they represent the school.

[redacted] are exceptional young women because they have been shown what it means to be dependable, humble, and thoughtful. Their father's guidance has played an essential role in helping them grow into not only strong athletes but truly good people.

It is a privilege to coach this family, and I offer my strongest recommendation for the character and integrity of both the girls and their father.

Sincerely,
Coach Nolan Brown
Head Coach, Redlands High School Swimming

Exhibit

"12"

THE UNITED STATES OF AMERICA

No. 37583326

CERTIFICATE OF NATURALIZATION

Personal description of holder as of date of naturalization:

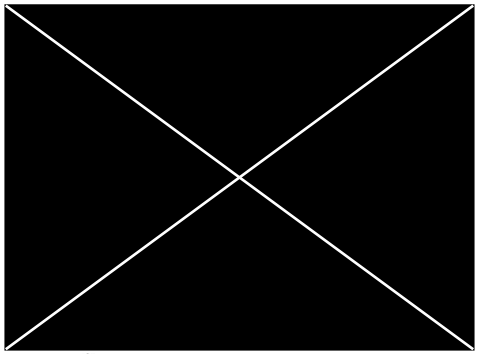
Date of birth: MARCH 18, 1948

Sex: MALE

Height: 5 *feet* 4 *inches*

Marital status: MARRIED

Country of former nationality: INDONESIA



ALTERATION OR MISUSE OF THIS DOCUMENT IS A FEDERAL OFFENSE AND PUNISHABLE BY LAW

USCIS Registration No: A095630211

I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.

(Complete and true signature of holder)

Be it known that, pursuant to an application filed with the Secretary of Homeland Security

at: SAN BERNARDINO, CALIFORNIA

The Secretary having found that:
GUNAWAN YAPHAR BOEN

residing at: LOMA LINDA, CALIFORNIA

having complied in all respects with all of the applicable provisions of the naturalization laws of the United States, being entitled to be admitted as a citizen of the United States, and having taken the oath of allegiance at a ceremony conducted by
US DISTRICT COURT CENTRAL DISTRICT

at: LOS ANGELES, CALIFORNIA *on:* JULY 22, 2015

such person is admitted as a citizen of the United States of America.

U. S. Citizenship and Immigration Services

DEPARTMENT OF HOMELAND SECURITY

FORM N-550 (REV. 10/12)

Exhibit

"13"

My name is [redacted] and I am the mother of **Agustinus Na, my first-born child,** who is currently detained at the Otay Mesa Detention Center in San Diego. As his mother, this separation has been one of the most painful experiences of my life. I have loved him and cared for him since the day he was born, and having my first born taken from our family has left a deep and constant ache in my heart.

I already live with **hypertension, chronic kidney disease, and hyperlipidemia,** and the stress of my son's detention has made my health much worse. My blood pressure is harder to control, I feel weak and overwhelmed, and I cry often from worry. The emotional strain has taken a significant toll on my overall health, and the fear for his safety has caused many sleepless nights.

Agustinus is a devoted and loving father. His twin daughters, [redacted] mean everything to him. He never misses their swim meets or competitions—he is always there cheering them on, supporting them, and celebrating their achievements. He loves taking them out to eat, spending quality time with them, and being present in their lives. His absence has deeply affected the twins, who miss their father every day.

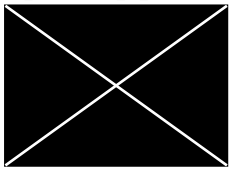
Family gatherings are very important to us. We always look forward to holidays and coming together with all my children. This year, for the first time, **Agustinus was not with us for Thanksgiving.** His empty seat at the table broke all our hearts. It was painful to celebrate a family holiday without him, knowing he was alone and separated from the people who love him.

Not having him around has left great emptiness in our home. I miss his voice, his presence, and the comfort of knowing my son is safe. With my health already fragile, this stress has been extremely difficult to bear.

I respectfully ask for compassion in his case so that Agustinus can return home to his family, his daughters, and his mother—who love him deeply and truly needs him.

Thank you for taking the time to understand the emotional, physical, and family hardship we are going through during his detention.

Respectfully,



Exhibit

"14"

UNITED STATES OF AMERICA PERMANENT RESIDENT

Surname
NA

Given Name
SUY J

USCIS#

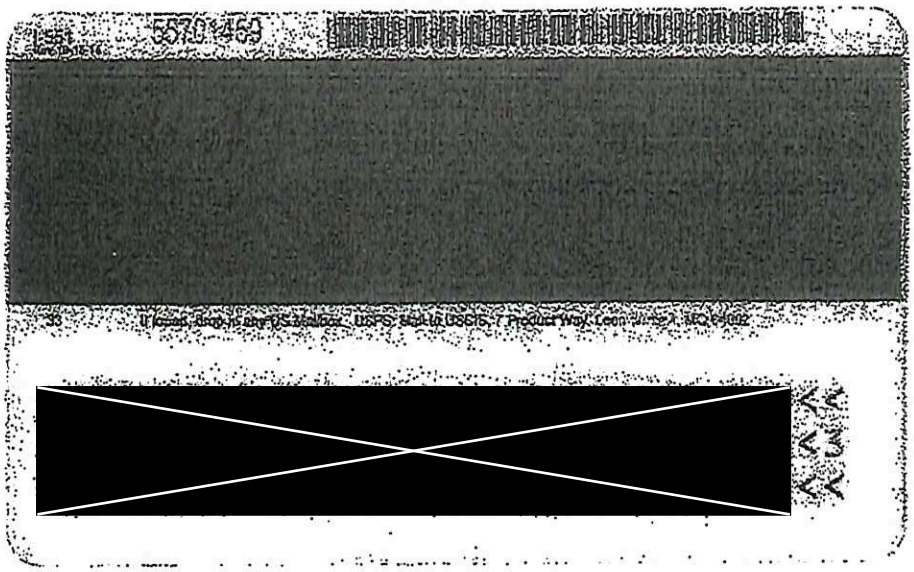
Category
IR0

Country of Birth
Indonesia

Date of Birth

Sex
F

Card Expires: 03/21/27
Resident Since: 03/17/07



Exhibit

"15"

[redacted]4

To Whom It May Concern,

My name is [redacted] formerly [redacted] before I was married, and I am writing this statement on behalf of my older brother, **Agustinus Na**, who is currently detained at the Otay Mesa Detention Center in San Diego, California. I would like to share information about his character, his essential role in his family, and the significant hardship his detention has caused.

Agustinus is a devoted husband to his wife, [redacted] and a loving father to their twin daughters, [redacted] who are honor students in their high school. Both girls are currently in the process of applying to colleges and universities—a critical and stressful time in their lives when they need their father's guidance and support more than ever. Although [redacted] works part-time, **Agustinus has always been the primary provider for their household**, ensuring the family's financial stability and emotional well-being.

Agustinus is deeply involved in his daughters' lives. **He has never missed a single swim meet** that [redacted] have competed in. His constant presence, encouragement, and pride in their accomplishments have played a major role in their academic and personal success. His commitment to being present for every milestone speaks to his dedication as a father.

As his sister, I have always known Agustinus to be responsible, hardworking, kind, and deeply family oriented. He is a man of strong character, integrity, and compassion who puts his family first in everything he does.

Since his detention, his family has experienced severe emotional and financial hardship. [redacted] part-time income is not enough to sustain their household, and the stress of managing everything alone has been overwhelming. For [redacted] the absence of their father during their senior year of high school—when they are making crucial decisions about their future—is heartbreaking and destabilizing. They are struggling not only with the uncertainty of this situation but also with the emotional impact of losing their father's daily presence and support.

Agustinus is irreplaceable in the lives of his wife and daughters, and I respectfully ask for compassion for and consideration of his strong character, his vital role as the primary provider, and the profound hardship his detention has caused. We hope for a resolution that allows him to return home to support and care for his family, who need him deeply during this crucial time.

Thank you for taking the time to read my statement. Please feel free to contact me if any further information is needed.

Sincerely,

[redacted]

Exhibit

"16"

THE UNITED STATES OF AMERICA

No. 29583401

CERTIFICATE OF NATURALIZATION

CIS Registration No: A077992927

Personal description of holder as of date of naturalization:

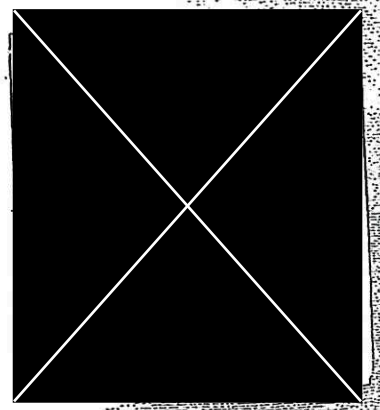
Date of birth: JULY 04, 1979

Sex: FEMALE

Height: 5 feet 1 inches

Marital status: MARRIED

Country of former nationality: INDONESIA



I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.

(Complete and true signature of holder)

Be it known that, pursuant to an application filed with the Secretary of Homeland Security

at: LOS ANGELES, CALIFORNIA

The Secretary having found that:

YULYA TERESIA LE

then residing in the United States, intends to reside in the United States when so required by the Naturalization Laws of the United States, and had in all other respects complied with the applicable provisions of such naturalization laws and was entitled to be admitted to citizenship, such person having taken the oath of allegiance in a ceremony conducted by the

US DISTRICT COURT CENTRAL DISTRICT

at: MONTEBELLO, CALIFORNIA on: MAY 05, 2006

that such person is admitted as a citizen of the United States of America.

IT IS PUNISHABLE BY U. S. LAW TO COPY, PRINT OR PHOTOGRAPH THIS CERTIFICATE, WITHOUT LAWFUL AUTHORITY.

Director, U. S. Citizenship and Immigration Services

DEPARTMENT OF HOMELAND SECURITY

FORM N-550 REV. 4/04

Exhibit

"17"

Statement from [redacted]

My name is [redacted], and I am the younger brother of **Agustinus Na**, who is now detained at **Otay Mesa Detention Center**.

- Agustinus has lived in the United States since **December 1990**. We are not very close, but I have always respected him as my big brother. He is a quiet and steady person. He loves his daughters, [redacted] and never missed their swim meets or school events. Family has always been important to him.

His detention has been very hard for all of us. The house feels empty without him. He missed **Thanksgiving**, and now we are hoping he will be here to celebrate my birthday on **December 24th.** Every year, our family—my parents, my sisters, my nieces, my sister-in-law, and my brother-in-law—celebrates together. It hurts knowing he won't be there this year.

His daughters are in their last year of high school and applying for colleges. They need their father during this important time. We are all worried about him. We miss him every day and hope he can come home soon.

Thank you for reading my statement.

Sincerely,

[redacted]

Exhibit

"18"

UNITED STATES OF AMERICA

No. 41432373

CERTIFICATE OF NATURALIZATION

Personal description of holder as of date of naturalization:

Date of birth: DECEMBER 24, 1985

Sex: MALE

Height: 5 feet 07 inches

Marital status: SINGLE

Country of former nationality: INDONESIA

[redacted]

USCIS Registration No.: A095 630 212

I certify that the description given is true, and that the photograph affixed hereto is a likeness of me.

(Complete and true signature of holder)

Be it known that, pursuant to an application filed with the Secretary of Homeland Security

at: SAN BERNARDINO, CALIFORNIA

The Secretary, having found that:

KRISTIANUS NA

residing at:

LOMA LINDA, CALIFORNIA

having complied in all respects with all of the applicable provisions of the naturalization laws of the United States, being entitled to be admitted as a citizen of the United States, and having taken the oath of allegiance at a ceremony conducted by

US DISTRICT COURT CENTRAL DISTRICT

at: LOS ANGELES, CALIFORNIA on: DECEMBER 19, 2019

such person is admitted as a citizen of the United States of America.

U. S. Citizenship and Immigration Services

ALTERATION OR MISUSE OF THIS DOCUMENT IS A FEDERAL OFFENSE AND PUNISHABLE BY LAW

DEPARTMENT OF HOMELAND SECURITY

FORM N-550 (REV. 10-77)

Exhibit

"19"

Departure Number

[redacted]

Immigration and
Naturalization Service

I-94
Departure Record

D.E. IMMIGRATION
160 LOS 374
26 DEC 90

JUN 27 1991

14 Family Name
N A

15 First (Given) Name
A G U S T I N U S

16. Birth Date (Day/Mo/Yr)
[redacted] 7 7

17 Country of Citizenship
I N D O N E S I A

See Other Side

STAPLE HERE

Exhibit

"20"

2

KETERANGAN PEMEGANG/DESCRIPTION OF BEARER

Nama lengkap/full name

AGUSTINUS, NA.

LK/M

PR/F

Tempat & tgl. lahir/place & date of birth

JAKARTA, 23 AGUSTUS 1977.

< SERIBU SEMBILAN RATUS TUJUH PULUH TUJUH >

Alamat / address JL. RAYA JATINEGARA TIMUR NO: 27. RT. 008/04. KEL. BALIMESTER JATINEGARA. JAKARTA TIMUR.

Pekerjaan/Profession

—

TANDA-TANDA ISTIMEWA/SPECIAL MARKS

muka/face	*mata/eyes*	*rambut/hair*
OVAL.	COKLAT TUA DARK BROWN	HITAM BLACK

tinggi/height	*tanda lain/other mark*
160. cm	—

Disertai oleh/accompanied by ..... *anak/children; keterangan pada hal. 7 dan 8/descriptions on page 7 and 8*

PP. NO. B 451667

REG. NO. 1A1JC4778-LBTT

JAJC

KANTOR IMIGRASI JAKARTA TIMUR

Tandatangan pemegang/Signature of bearer

PASPOR INI BERLAKU UNTUK SELURUH DUNIA
THIS PASSPORT IS VALID FOR ALL PARTS OF THE WORLD

KECUALI / EXCEPT : —

BERLAKU SAMPAI/VALID UNTIL
03 12 1996
DECEMBER 03 1996

DIKELUARKAN/ISSUED

DI/AT: JAKARTA TIMUR

TGL/ON: 03 12 1990
DECEMBER 03 1990

OLEH/BY: KANTOR IMIGRASI JAKARTA TIMUR

KANTOR IMIGRASI JAKARTA TIMUR
DEPARTEMEN KEHAKIMAN RI

Tandatangan / Signature

I.D. SANGI
NIP. 040007259
KEPALA KANTOR IMIGRASI

Diserta... keterangan / ...tan ...ion

REG. No.

DIPERPANJANG SAMPAI/EXTENDED UNTIL

DI/AT:

TGL/ON:

OLEH/BY:

Tandatangan / Signature

Nama & jabatan / Name & position

UNTUK PERHATIAN ANDA/PEMEGANG PASPOR INI.

1. Paspor ini adalah dokumen negara dan milik negara.
2. Kecuali pejabat yang berwenang, dilarang mencoret-coret atau melakukan perubahan apapun atas tulisan/cetakan yang terdapat dalam paspor ini.
3. Jagalah paspor ini agar tidak rusak, kotor atau hilang.
4. Bila terjadi kehilangan paspor, harap segera melaporkannya :
   a. kepada Polisi terdekat dan kepada Kantor Imigrasi yang mengeluarkan paspor tersebut, dalam hal kehilangannya terjadi di dalam negeri;
   b. kepada Polisi terdekat dan kepada Perwakilan RI terdekat, dalam hal kehilangannya terjadi di luar negeri.
5. Untuk mengunjungi negara lain, anda perlu minta visa dan keterangan secukupnya terlebih dahulu dari Perwakilan negara yang bersangkutan.
6. Untuk kepentingan anda sendiri, laporlah pada Perwakilan RI setempat bila akan tinggal lebih dari 5 (lima) hari di negara yang dikunjungi. Perhatikan pasal 17 Undang-Undang Kewarganegaraan RI yang tercantum di halaman dalam kulit belakang paspor ini.
7. Perbuatan-perbuatan yang menurut Undang-Undang Paspor Tahun 1959 dianggap sebagai kejahatan dan akan dipidana adalah menyerahkan paspor kepada orang lain dengan maksud dipergunakan secara tidak berhak, memakai dengan sengaja paspor orang lain, mempergunakan paspor yang sudah dinyatakan dicabut/dibatalkan berlakunya, dan dengan sengaja memberikan keterangan yang tidak benar untuk memperoleh paspor.

PASPOR

PASPOR DICABUT KARENA TELAH
DIBERIKAN PASPOR BARU / SP
NOMOR: [redacted] XTT
REG.
TGL. PENGELUARAN
LOS ANGELES,

BHINNEKA TUNGGAL IKA

MUCHDOR,
KONSUL

KONSULAT JENDERAL REPUBLIK INDONESIA ★ LOS ANGELES

WARGA NEGARA INDONESIA
INDONESIAN NATIONAL

Paspor ini berisi 48 hal./This passport contains 48 pages.

Exhibit

"21"

United Education Institute

CERTIFICATE OF COMPLETION

Presented to

Agustinus Na

For completing the clinical and didactic portion of the Pharmacy Technician Program, achieving a GPA of 91% and demonstrating professionalism and excellence.

Given this 28th day of June, Two Thousand at United Education Institute, Ontario, California.

Instructor | Allied Health Director | Jacqueline Ford Executive Director

Exhibit

"22"

dca SEARCH

BOARD OF PHARMACY

ISSUANCE DATE
JULY 31, 2009
EXPIRATION DATE
AUGUST 31, 2026
CURRENT DATE / TIME
DECEMBER 19, 2025
1:20:42 PM

LICENSING DETAILS FOR: TCH 34084

NAME: [illegible] AGUSTINUS
LICENSE TYPE: PHARMACY TECHNICIAN
LICENSE STATUS: CLEAR ⊙

ADDRESS NOT DISCLOSED