

1 **MARDY M. SPROULE**
2 California State Bar No. 207048
3 **LAW OFFICES OF MARDY M. SPROULE**
4 15141 Whittier Blvd, Suite 250
5 Whittier, CA 90603
6 Tel (323)726-0999
7 Fax (323)726-0990
8 Email: Mardy.Sproule@att.net

9 Attorney for Petitioner, *Nelson Geovanni Arreaga Meza*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT COURT OF ARIZONA**

12 Nelson Geovanni Arreaga Meza

13 Petitioner,

14 v.

15
16 Kristi Noem, Secretary of Department of
17 Homeland Security; Pamela Bondi,
18 Attorney General of the United States;
19 Todd Lyons, Acting Director, United
20 States Immigration and Customs
21 Enforcement; John Cantu, Field Office
22 Director for ICE's Enforcement and
23 Removal Operations Field Office; Fred
24 Figueroa, Warden of the Eloy Detention
25 Center; Sirce Owen, Executive Office for
26 Immigration Review,

27 Respondents,

Case No.: 2:25-cv-04900-DWL--ASB

**PETITION FOR WRIT OF HABEAS
CORPUS, PURSUANT TO 28 U.S.C.
§2241; COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF UNDER
THE ADMINISTRATIVE
PROCEDURE ACT,
5 U.S.C. §§702-706**

1 **PETITION FOR WRIT OF HABEAS CORPUS**

2 Nelson Geovanni Arreaga Meza Petitions this court for a Writ of Habeas
3
4 Corpus, pursuant to 28 U.S.C. §2241 and the Administrative Procedure Act, 5
5 U.S.C. §701, et seq., to remedy his unlawful re-detention by Respondents.
6
7 Petitioner has been illegally re-detained in Immigrations and Customs Enforcement
8 (“ICE”) custody since June 29, 2025 in violation of the Constitution. This Court
9
10 should order his immediate release.

11 Petitioner requests that he be released during the pendency of this Petition.
12 In support of this Petition, Petitioner alleges as follows:

13 **INTRODUCTION**

14
15 1. Petitioner, Nelson Geovanni Arreaga Meza entered the United States
16 in 1999 without inspection. His life partner joined him in the United States in
17 2000. They have settled here together since then. They have five children
18 together: Otto Arreaga Gonzalez, 29; Nelson Arreaga Gonzalez, 27; Danitza
19 Arreaga Gonzalez, 25; and twins David and Reyna Arreaga Gonzalez, 18. The
20
21 twins are United States citizens.
22

23 2. On July 24, 2012, removal proceedings were initiated against him
24 with the issuance of a putative Notice to Appear. *Exhibit 1: Notice to Appear.*
25
26 DHS charged him with being present in the United States without admission, in
27
28 violation of 8 U.S.C. §1182(a)(6)(A)(i).

1 3. Having been found by an ICE authorizing official to: (1) not to be
2 subject to mandatory detention; (2) not to be a threat to national security, public
3 health or safety; and (3) not a flight risk he was released from custody under an
4 order of supervision pursuant to 8 C.F.R. §241.5(a), specifically, under ICE's
5 Alternative To Detention ("ATD") program. *Exhibit 2: Order of Supervision,*
6 *ATD-ISAP*

9 4. On July 23, 2015, the Immigration Judge ("IJ") granted an
10 unopposed motion to administratively close his removal proceedings. *Exhibit 3:*
11 *Administrative Closure Order.* At his following ATD-ISAP reporting
12 appointment, he was told by ICE that he was no longer required to report unless
13 and until his case was recalendared by the IJ. *Exhibit 4: Declaration of Nelson*
14 *Geovanni Arreaga Mesa.* Mr. Arreaga Meza has continued to live, work and
15 contribute to his community with his valid employment authorization ("EAD")
16 since then. *Exhibit 5: Approval Notice of Employment Authorized from*
17 *9/12/2024-9/11/2029.*

18 5. On June 29, 2025, Mr. Arreaga's son, Otto Arreaga Gonzalez,
19 appeared in state court related to a traffic citation. When he failed to return home,
20 Mr. Arreaga Meza went to the police station in Havasu, Arizona to inquire about
21 his son. The police asked him for identification. He presented his valid driver's
22 license and valid EAD. *Exhibit 4.* The police then contacted ICE, who then re-

1 detained Mr. Arreaga Meza and was told that his removal proceeding would be
2 re-calendared. However, at no time was he informed why his release was being
3 revoked or why he was being re-detained. *Exhibit 4*. The revocation of his release
4 without warning, without a formal or informal interview, without a hearing,
5 without explanation, and with no procedural step to revisit that prior
6 determination and without due process is a violation of 8 C.F.R. §241.4(l).
7
8

9
10 6. He is currently being held in mandatory detention. The mandatory
11 detention provision of 8 U.S.C. §1225(b)(2)(A) does not apply to Mr. Arreaga
12 Meza. Section 1225(b)(2)(A) governs only those individuals who are applicants
13 for admission encountered at or near the border, not those who have already
14 entered and established residence in the interior. Because Mr. Arreaga Meza
15 entered the United States in 1999, and was arrested in Havasu, Arizona, on June
16 29, 2025, well within the United States, he is properly subject to 8 U.S.C.
17 §1226(a) — the statute that governs custody of individuals arrested after entry
18 and permits their release on conditional parole or upon payment of bond.
19
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22
23 7. On September 5, 2025, the BIA issued *Matter of Yajure Hurtado*, 29
24 I&N Dec. 216 (BIA 2025), adopting DHS's position that noncitizens "present in
25 the United States without admission" are subject to mandatory detention under
26 INA §235(b)(2)(A) and that immigration judges lack bond jurisdiction even when
27
28

1 ICE has placed the case in §240 proceedings. DHS now relies on *Yajure Hurtado*
2 to argue that the IJ never had authority to set bond and that continued detention—
3 without judicial bond review—is required. This new precedent is unlawful and
4 cannot justify Petitioner’s ongoing confinement: it misreads the statute, conflicts
5 with binding regulations that limit expedited-removal custody to classes designated
6 by Federal Register notice, and raises grave constitutional concerns the avoidance
7 canon requires courts to steer away from. *See* INA §235(b)(2)(A), 8 U.S.C.
8 §1225(b)(2)(A); 8 C.F.R. §235.3(b)(1)-(2); 62 Fed. Reg. 10,312, 10,314, 10,318
9 (Mar. 6, 1997); 69 Fed. Reg. 48,877, 48,880-81 (Aug. 11, 2004); 84 Fed. Reg.
10 35,409, 35,412 (July 23, 2019); *Jennings v. Rodriguez*, 583 U.S. 281 (2018);
11 *Zadvydas v. Davis*, 533 U.S. 678 (2001); *Clark v. Meza*, 543 U.S. 371 (2005).
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17 8. This issue that has been the subject of extensive litigation in recent
18 months—whether 8 U.S.C. § 1226(a), which contemplates a bond hearing, or 8
19 U.S.C. § 1225(b)(2), which mandates detention, applies when ICE apprehends an
20 alien who entered the United States without inspection, never formally applied for
21 admission, and has been living in the United States for years or decades. In
22 *Echevarria v. Bondi*, 2025 WL 2821282 (D. Ariz. 2025), the District Court of
23 Arizona found that that § 1226(a) applies in this circumstance. Based on that
24 determination, similar Courts have granted habeas relief—taking the form of an
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1 orders requiring petitioners to be released from custody or provided with a prompt
2 bond hearing—in many recent § 2241 actions brought by individual petitioners.
3
4 *See, e.g., Hernandez v. Rocha*, No. 25-CV-4280-PHX-SHD (D. Ariz. Dec. 9,
5 2025). “Dozens of other courts have reached the same conclusion,” although
6
7 “judges across the country are not in full agreement on how this issue should be
8 resolved.” *Id.* at *2.
9

10 9. Petitioner also brings this petition for a writ of habeas corpus to seek
11 enforcement of his rights as a member of the Bond Denial Class certified in
12 *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM (C.D. Cal.)
13
14 Petitioner is in the physical custody of Eloy Detention Center. He now faces
15 unlawful detention because the DHS and EOIR have refused to abide by the
16 declaratory judgment issued on behalf of the certified class in *Maldonado*
17 *Bautista v. Santacruz*.
18

19
20 10. On November 20, 2025, the district court granted partial summary
21 judgment on behalf of individual plaintiffs and on November 25, 2025, certified a
22 nationwide class and extended declaratory judgment to the certified class.
23
24 *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d
25 ----, 2025 WL 3289861, at *11 (C.D. Cal. Nov. 20, 2025) (order granting partial
26 summary judgment to named Plaintiffs-Petitioners); *Maldonado Bautista v.*
27
28

1 *Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL
2 3288403, at *9 (C.D. Cal. Nov. 25, 2025) (order certifying Plaintiffs-Petitioners'
3 proposed nationwide Bond Eligible Class, incorporating and extending
4 declaratory judgment from Order Granting Petitioners' Motion for Partial
5 Summary Judgment).

6
7
8 11. The declaratory judgment held that the Bond Denial Class members
9 are detained under 8 U.S.C. §1226(a) and thus may not be denied consideration
10 for release on bond under §1225(b)(2)(A). *Maldonado Bautista*, 2025 WL
11 3289861, at *11.

12
13 12. On December 18, 2025, the *Bautista* court entered judgment under
14 Rule 54(b) declaring “the Bond Eligible Class members are detained under 8
15 U.S.C. § 1226(a) and are not subject to mandatory detention under § 1225(b)(2)”
16 and vacating “the Department of Homeland Security policy described in the July
17 8, 2025, ‘Interim Guidance Regarding Detention Authority for Applicants for
18 Admission’ under the Administrative Procedure Act as not in accordance with
19 law. 5 U.S.C. § 706(2)(A).” *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-
20 BFM, Document 94 (C.D. Cal. Dec. 18, 2025).

21
22 13. Petitioner, Nelson Geovanni Arreaga Meza, is a member of the
23 Bond Eligible Class, as he:
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- 1 a. does not have lawful status in the United States and is
2 currently detained at the Eloy Detention Center. He was
3 apprehended by immigration authorities on June 29, 2025 and
4 has been held in custody since that date;
5
6 b. entered the United States without inspection over 26 years ago
7 and was not apprehended upon arrival, *cf. id.*; and
8
9 c. is not detained under 8 U.S.C. §1226(c), §1225(b)(1), or
10 §1231.
11

12 14. The Court should expeditiously grant this petition.
13

14 15. Respondents are bound by the judgment in *Maldonado Bautista*, as it
15 has the full “force and effect of a final judgment.” 28 U.S.C. §2201(a).
16 Nevertheless, Respondents continue to flagrantly defy the judgment in that case
17 and continue to subject Petitioner to unlawful detention despite his clear
18 entitlement to consideration for release on bond as a Bond Eligible Class member.
19

20 16. IJ’s have informed class members in bond hearings that they have
21 been instructed by “leadership” that the declaratory judgment in *Maldonado*
22 *Bautista* is not controlling, even with respect to class members, and that instead IJs
23 remain bound to follow the agency’s prior decision in *Matter of Yajure Hurtado*,
24 29 I. & N. Dec. 216 (BIA 2025).
25
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1 17. Because Respondents are detaining Petitioner in violation of the
2 declaratory judgment issued in *Maldonado Bautista*, the Court should accordingly
3 order that within one day, Respondent DHS must release Petitioner.
4

5 18. Alternatively, the Court should order Petitioner be afforded a bond
6 hearing within 7 days.
7

8 19. If habeas is not granted, Mr. Arreaga Meza, who has been separated
9 from his family and unable to provide for or care for his wife and children, will
10 suffer irreparable harm.
11

12 **PARTIES**

13 20. Petitioner, Nelson Geovanni Arreaga Meza, was detained by
14 immigration authorities on June 29, 2025. He remains in custody at the Eloy
15 Detention Center in Eloy, Arizona.
16
17

18 21. Respondent, Kristi Noem, is the Secretary of Homeland Security.
19 She is responsible for “[c]arrying out the immigration enforcement functions
20 vested by statute in, or performed by, the Commissioner of [the former]
21 Immigration and Naturalization (or any officer, employee, or component of the
22 Immigration and Naturalization Service),” 6 U.S.C. §202(3), and for
23 “[e]stablishing national immigration enforcement policies and priorities.” 6
24 U.S.C. §202(5). She is sued in her official capacity.
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1 22. Respondent, Pamela Bondi, is the Attorney General of the United
2 States. She has a mandate, pursuant to 8 U.S.C. §§1101(b)(4) and 1103(g)(1)-(2),
3 to supervise the implementation and enforcement of the INA, including the
4 apprehension, detention, and deportation of removable aliens under §§236(a) and
5 241(a) of the INA, 8 U.S.C. §§1226(a) and 1231(a). She is sued in her official
6 capacity.
7

8
9 23. Respondent, Todd Lyons is the acting director of United States
10 Immigration and Customs Enforcement. He has a mandate, pursuant to 6 U.S.C.
11 §§251(2) and 252(a)(3)(A)(ii) and 8 U.S.C. §§1103(a)(1) and 1103(g)(2), to
12 exercise any functions delegated to him by the Secretary of Homeland Security,
13 including the enforcement of the INA and all other laws, regulations, and policies
14 pertaining to the immigration and naturalization of immigrants, and the
15 apprehension and detention of noncitizens for removal from the United States.
16 He is sued in his official capacity.
17
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19
20 24. Respondent, John Cantu, Field Office Director for Immigration and
21 Customs Enforcement, Enforcement and Removal Operations Field Office. He
22 has a duty, delegated to him by the Secretary of the United States Department of
23 Homeland Security and the Director of United States Immigration and Customs
24 Enforcement, to supervise the apprehension, detention, and removal of
25 noncitizens within Arizona. He is sued in his official capacity.
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1 violation of the Constitution, laws or treatises thereof occurred in the Central
2 District. 28 U.S.C. §1391, 2241.

3
4 30. This Court may grant relief pursuant to 28 U.S.C. §2241, the
5 Declaratory Judgment Act, 28 U.S.C. §2201 *et seq.*, and the All Writs Act, 28
6 U.S.C. §1651.
7

8 **REQUIREMENTS OF 28 U.S.C. §2243**

9
10 31. The Court should grant the petition for writ of habeas corpus
11 “forthwith,” as the legal issues have already been resolved for class members in
12 *Maldonado Bautista*.

13
14 32. Habeas corpus is “perhaps the most important writ known to the
15 constitutional law . . . affording as it does a *swift* and imperative remedy in all
16 cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963)
17 (emphasis added). “The application for the writ usurps the attention and displaces
18 the calendar of the judge or justice who entertains it and receives prompt action
19 from him within the four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116,
20 1120 (9th Cir. 2000) (citation omitted).
21
22

23 **LEGAL FRAMEWORK**

24
25 33. This case concerns release under an order of supervision under 8
26 C.F.R. 241.5(a) and the corresponding revocation of that release regulations under
27 8 C.F.R. 241.4(l). In this case, the ICE officials violated 8 C.F.R. § 241.4(1).
28

1 Failure to follow these procedures offends the basic notions of Due Process under
2 the Fifth Amendment to the Constitution. *Mathews v. Eldridge*, 424 U.S. 319
3 (1976).
4

5 34. The Fifth Amendment recognizes that even noncitizens have a liberty
6 interest in not being arbitrarily re-detained. In *Jorge M. F. v. Wilkinson*, 534
7 F.Supp.3d 1050, 1054 (N.D. Cal. April 14, 2021), the district court granted an
8 emergency temporary restraining order (TRO) preventing the government from re-
9 detaining the petitioner without providing sufficient notice and an opportunity for a
10 hearing on the legality of detention.
11
12

13 35. This case concerns also the detention provisions at 8 U.S.C.
14 §§1226(a) and 1225(b)(2). The detention provisions at §1226(a) and §1225(b)(2)
15 were enacted as part of the Illegal Immigration Reform and Immigrant
16 Responsibility Act (IIRIRA) of 1996, Pub. L. No. 104—208, Div. C, §§302–03,
17 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Section 1226(a) was
18 most recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-
19 1, 139 Stat. 3 (2025).
20
21
22

23 36. Thus, in the decades that followed, most people who entered without
24 inspection and were placed in standard removal proceedings received bond
25 hearings, unless their criminal history rendered them ineligible. That practice was
26 consistent with many more decades of prior practice, in which noncitizens who
27
28

1 were not deemed “arriving” were entitled to a custody hearing before an IJ or
2 other hearing officer. *See* 8 U.S.C. §1252(a) (1994); see also H.R. Rep. No. 104-
3 469, pt. 1, at 229 (1996) (noting that §1226(a) simply “restates” the detention
4 authority previously found at §1252(a)).
5

6
7 37. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new
8 policy that rejected well-established understanding of the statutory framework
9 and reversed decades of practice. The new policy, entitled “Interim Guidance
10 Regarding Detention Authority for Applicants for Admission,” claims that all
11 persons who entered the United States without inspection shall now be deemed
12 “applicants for admission” under 8 U.S.C. §1225, and therefore are subject to
13 mandatory detention provision under §1225(b)(2)(A). The policy applies
14 regardless of when a person is apprehended and affects those who have resided in
15 the United States for months, years, and even decades.
16
17

18
19 38. On September 5, 2025, the BIA published *Matter of Yajure*
20 *Hurtado*, 29 I&N Dec. 216 (BIA 2025), a precedential decision holding that
21 holding that immigration judges lack authority to hear bond requests or to grant
22 bond to aliens...who are present in the United States without admission pursuant
23 to INA §235(b)(2)(A), 8 U.S.C. §1225(b)(2)(A). The BIA essentially determined
24 that such persons who entered without inspection are subject to mandatory
25 detention under 8 U.S.C. §1225(b)(2)(A).
26
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1
2 41. Petitioner incorporates by reference the allegations of fact set forth
3 in the preceding paragraphs as if set forth fully herein.

4
5 42. If Respondents are allowed to re-detain Mr. Arreaga Meza without
6 notice or an opportunity to challenge the detention, it will violate his rights
7 guaranteed by the Due Process Clause of the Fifth Amendment of the U.S.
8 Constitution.
9

10 43. “Freedom from imprisonment—from government custody, detention,
11 or other forms of physical restraint—lies at the heart of the liberty [the Due
12 Process] Clause protects.” *Zadvydas*, 533 U.S. at 690. Additionally, the Ninth
13 Circuit agrees that the noncitizen’s “private interest at issue here is ‘fundamental’:
14 freedom from imprisonment is at the ‘core of the liberty protected by the Due
15 Process Clause.’” *Hernandez v. Sessions*, 872 F.3d 976, 993 (9th Cir. 2017)
16 (internal citation omitted). Historical precedent is quite strong in recognizing that
17 the Petitioner has a significant private liberty interest.
18
19
20

21 44. The mandatory detention provision at 8 U.S.C. §1225(b)(2) does not
22 apply to all noncitizens residing in the United States who are subject to the
23 grounds of inadmissibility. As relevant here, it does not apply to those who
24 previously entered the country and have been residing in the United States prior
25 to being apprehended and placed in removal proceedings by Respondents. Such
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27
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1 noncitizens are detained under §1226(a), unless they are subject to § 1225(b)(1),
2 §1226(c), or §1231.
3

4 45. The government's detention of Petitioner without a bond
5 redetermination hearing to determine whether he is a flight risk or danger to
6 others violates his right to due process.
7

8 **Request for Relief Pursuant to *Maldonado Bautista***

9 46. Additionally, as a member of the Bond Eligible Class, Petitioner is
10 also entitled to consideration for release on bond under 8 U.S.C. §1226(a).
11

12 47. The order granting partial summary judgment in *Maldonado Bautista*
13 holds that Respondents violate the INA in applying the mandatory detention statute
14 at §1225(b)(2) to class members.
15

16 48. The order granting class certification in *Maldonado Bautista* further
17 orders that “[w]hen considering this determination with the MSJ Order, the Court
18 extends the same declaratory relief granted to Petitioners to the Bond Eligible
19 Class as a whole.”
20
21

22 49. Respondents are parties to *Maldonado Bautista* and bound by the
23 Court's declaratory judgment, which has the full “force and effect of a final
24 judgment.” 28 U.S.C. §2201(a).
25

26 50. By denying Petitioner a bond hearing under §1226(a) and asserting
27 that he is subject to mandatory detention under §1225(b)(2), Respondents violate
28

1 Petitioner's statutory rights under the INA and the Court's judgment in *Maldonado*
2 *Bautista*.

3
4 **PRAYER FOR RELIEF**

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

- 6
7 a. Assume jurisdiction over this matter;
- 8
9 b. Issue a writ of habeas corpus requiring that within one day, Respondents
10 immediately release;
- 11
12 c. Alternatively, issue a writ of habeas corpus requiring Respondents to
13 provide Petitioner with a bond hearing pursuant to 8 U.S.C. §1226(a)
14 within 7 days;
- 15
16 d. Award Petitioner attorney's fees and costs under the Equal Access to Justice
17 Act ("EAJA"), as amended, 28 U.S.C. §2412, and on any other basis
18 justified under law; and
- 19
20 e. Grant any other and further relief that this Court deems just and proper.

21 Dated: December 29, 2025

22 Respectfully Submitted,
23 S/ Mardy M. Sproule

24 Attorney for *Nelson Geovanni Arreaga Meza*
25 Email: Mardy.Sproule@att.net

EXHIBIT INDEX

EXHIBITS

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EX. 1 NOTICE TO APPEAR

U.S. Department of Homeland Security

Notice to Appear

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID : [redacted] FIN #: [redacted] File No: [redacted]
DOB: [redacted] Event No: [redacted]

In the Matter of: Nelson ARREAGA-Meza AKA: ARREAGA, NELSON ;

Respondent: [redacted] currently residing at:

[redacted] (Number, street, city and ZIP code) [redacted] (Area code and phone number)

- 1. You are an arriving alien.
2. You are an alien present in the United States who has not been admitted or paroled.
3. You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

- 1. You are not a citizen or national of the United States;
2. You are a native of GUATEMALA and a citizen of GUATEMALA;
3. You arrived in the United States at or near unknown place, on or about unknown date;
4. You were not then admitted or paroled after inspection by an Immigration Officer.
5. OR
6. At that time you arrived at a time or place other than as designated by the Attorney General.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
Section 235(b)(1) order was vacated pursuant to: 8CFR 208.30(f)(2) 8CFR-235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at: 606 South Olive Street, 15 Floor Los Angeles CALIFORNIA US 90014

(Complete Address of Immigration Court, including Room Number, if any)

on a date to be set at a time to be set to show why you should not be removed from the United States based on the charge(s) set forth above.

E SANTACRUZ

(Signature and Title of Issuing Officer)

Date: July 24, 2012

LOS ANGELES, CA

(City and State)

See reverse for important information

**EX. 2 ORDER OF SUPERVISION, ATD-
ISAP**

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ATD FULL SERVICE PARTICIPANT WORKSHEET

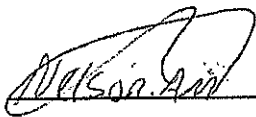
Field/Sub Office: LOS ANGELES	Officer: WAGNER
-------------------------------	-----------------

Participant Biographical Information			A-Number
Last Name: ARREAGA-Meza	First Name: Nelson		[REDACTED]
DOB (under 18 not eligible): [REDACTED]	COB: GUATEMALA		Gender <input checked="" type="checkbox"/> M <input type="checkbox"/> F
Language(s) Spoken SPANISH			
Alien Address	City	State	Zip Code
[REDACTED]	La Puente	CA	91744
Phone Number ([REDACTED])	Cell Phone ()		
Name, Address, Telephone (Sponsor/Friend/Family/Organization)			
Criminal Alien? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO <input checked="" type="checkbox"/> Pre-Order (Notice to Appear) <input type="checkbox"/> Post-Order (Final Order of Removal)			

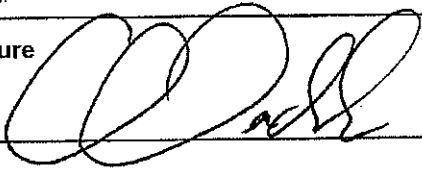
Supervision Requirements According to Case Status	
<input checked="" type="checkbox"/> Stage I - Pre-Order <ul style="list-style-type: none"> • 1 face-to-face contact every 2 weeks • 1 unannounced on-site home visit every 4 weeks • Technology Options: GPS or TR 	<input type="checkbox"/> Stage III - Appeal <ul style="list-style-type: none"> • 1 face-to-face contact every 4 weeks • 1 unannounced on-site home visit every 4 weeks • Technology Options: GPS or TR
<input type="checkbox"/> Stage II - Post-Order <ul style="list-style-type: none"> • 1 face-to-face contact every week • 1 unannounced on-site home visit every 2 weeks • Technology Options: GPS or TR 	<input type="checkbox"/> Stage IV - POCR - Removable in the Foreseeable Future <ul style="list-style-type: none"> • 1 face-to-face contact every week • 1 unannounced on-site home visit every 2 weeks • Technology Options: GPS or TR
<input type="checkbox"/> Stage V POCR - Not Removable in the Foreseeable Future <ul style="list-style-type: none"> • 1 face-to-face contact every 8 weeks • 1 unannounced on-site home visit every 8 weeks • Technology Options: GPS or TR 	

Employment Information

Business Name: Un-employed	Supervisor Name:
Address:	
Phone Number:	Fax Number:
Employment Length: Less than 1 Month	
Work Authorization Card: No	



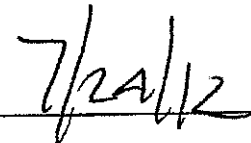
Participant Signature



ISCS Signature

7-24-12

Date

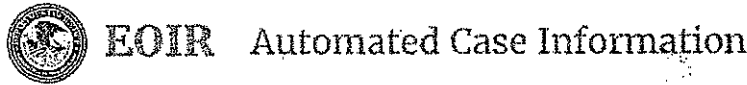


Date

22

**EX. 3 ADMINISTRATIVE CLOSURE
ORDER**

An official website of the United States government
Here's how you know



Court Closures Today July 30, 2025

Please check <https://www.justice.gov/eoir-operational-status> for up to date closures.

[Home](#) > MEZA, NELSON ARREAGA ([REDACTED])



Automated Case Information

Name: MEZA, NELSON ARREAGA | [REDACTED]

Next Hearing Information



There are no future hearings for this case.

Court Decision and Motion Information

The immigration judge issued an **ADMINISTRATIVE DECISION**.

DECISION DATE

July 23, 2015

EX. 4 DECLARATION OF
NELSON GEOVANNI ARREAGA
MEZA

TRANSLATION OF DECLARATION OF NELSON GEOVANNI ARREAGA-MEZA

//I, Nelson Geovanni Arreaga Meza, being over the age of eighteen and of sound mind, hereby declare under penalty of perjury, pursuant to the laws of the state of California, that the following is true and correct to the best of my knowledge and belief:

1. I am native and citizen of Guatemala.
2. I entered the United States in June 1999 without inspection. I have never left the country since that date.
3. I have been in a loving and committed relationship since 1996; I consider her my wife.
4. My partner and I share 5 children, two of which are United States citizens: Otto Arreaga Gonzalez, 29; Nelson Arreaga Gonzalez, 27; Danitza Arreaga Gonzalez, 25; and twins David and Reyna Arreaga Gonzalez, 18.
5. The twins are United States citizens.
6. In July 2010, a domestic dispute occurred between my wife and me.
7. The police were involved in order to calm things down; they took me away. They did not file charges against me but they did transfer me to ICE.
8. On July 24, 2012, removal proceedings were started against me for being in the country without inspection.
9. Having been found to: (1) not to be subject to mandatory detention; (2) not to be a threat to national security, public health or safety; and (3) not a flight risk I was released under Alternatives to Detention ("ATD") program.
10. I was compliant with the program to the best of my abilities.
11. I reported regularly between 2012-2015.
12. Never once between 2012-2015 was I told that that I was at risk of having my ATD-ISAP program canceled, that my release would be revoked.

13. Never once between 2012-2015 was I given a formal or informal interview to review revocation of my release.
14. My case was administratively closed by the immigration Judge on July 23, 2015.
15. When I went to my next ATD-ISAP reporting after my case was closed, the ICE officer told me that I did not need to report anymore unless and until the Immigration Court recalendared my case.
16. I have been working lawfully and living the in the United States ever since with no incidents.
17. I was never informed that I was not complying with the Court or ATD or that I was going to be redetained for any reason.
18. On June 29, 2025, my son Otto had a hearing in Havasu for a traffic violation. My nephew, Jorge, attended the hearing with him for moral support. As Otto was leaving court, ICE was waiting for him and arrested him. Jorge has a pending application for Adjustment of Status so he thought it would be safe to attend with Otto. In spite of that, Jorge was also taken into ICE custody just because he was with Otto.
19. By evening that day I did not know that Otto and Jorge had been detained by ICE. When they did not come back home, my wife and I worried about them. I decided to go to the police station in Havasu to ask if they knew anything about them.
20. At the police station I was asked for identification. I presented a valid driver's license