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

Attorney for Petitioner, *Nelson Arreaga Meza*

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Nelson Arreaga Meza,)	Case No.2:25-cv-04900-DWL-ASB
)	
Petitioner,)	
)	
v.)	PETITIONER'S <i>EX PARTE</i>
)	APPLICATION FOR
Kristi Noem, et al.,)	TEMPORARY RESTRAINING
)	ORDER AND ORDER TO
Respondents.)	SHOW CAUSE
)	

1 Petitioner, Nelson Geovanni Arreaga Meza (“Mr. Arreaga Meza”), hereby
2 makes this *ex parte* Application for a Temporary Restraining Order (“TRO”) and
3
4 Order to Show Cause (“OSC”) Re: Preliminary Injunction pursuant to Federal
5 Rule of Civil Procedure 65 and 5 U.S.C. §705. Petitioner is a man who entered
6
7 the United States in 1999 without inspection and has resided here continuously
8 since then without interruption. On July 24, 2012, removal proceedings were
9 initiated against him with the issuance of a putative Notice to Appear. DHS
10 charged him with being present in the United States without admission, in
11 violation of §212(a)(6)(A)(i) of the Immigration and Nationality Act (“INA”), as
12 amended; 8 U.S.C. §1182(a)(6)(A)(i). Having been found: (1) not to be subject to
13 mandatory detention; (2) not to be a threat to national security, public health or
14 safety; and (3) not a flight risk he was released from custody under an order of
15 supervision by Immigration and Customs Enforcement (“ICE”)’s Alternatives to
16 Detention (“ATD”) program pursuant to 8 C.F.R. §241.5(a). On July 23, 2015,
17 the Immigration Judge (“IJ”) administratively closed his removal proceedings
18 and he was told by ICE that he no longer needed to report to ATD unless his case
19 was recalendared by the Immigration Court.
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25 On June 29, 2025, ICE re-detained him without warning, without a formal
26 or informal interview, without hearing, no explanation, and no procedural step to
27 revisit that prior determination.
28

1 Further, after re-detaining him, ICE/Enforcement and Removal Operations
2 (“ERO”) and/or the Office of the Principal Legal Advisor (“OPLA”) did not
3
4 inform the Immigration Court that Mr. Arreaga Martinez was in their custody. As
5 a result, Mr. Arreaga Meza has been in ICE custody with no movement on his
6
7 case immigration case for almost 6 months.

8 On November 20, 2025, the United States District Court, Central District
9
10 of California granted partial summary judgment on behalf of individual plaintiffs
11 and on November 25, 2025, certified a nationwide class and extended declaratory
12 judgment to the certified class. *Maldonado Bautista v. Santacruz*, No. 5:25-CV-
13 01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3289861, at *11 (C.D. Cal. Nov.
14 20, 2025) (order granting partial summary judgment to named Plaintiffs-
15
16 Petitioners); *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --
17
18 - F. Supp. 3d ----, 2025 WL 3288403, at *9 (C.D. Cal. Nov. 25, 2025) (order
19 certifying Plaintiffs-Petitioners’ proposed nationwide Bond Eligible Class,
20
21 incorporating and extending declaratory judgment from Order Granting
22
23 Petitioners’ Motion for Partial Summary Judgment).

24 The declaratory judgment held that the Bond Denial Class members are
25
26 detained under 8 U.S.C. §1226(a) and thus may not be denied consideration for
27
28 release on bond under §1225(b)(2)(A). *Maldonado Bautista*, 2025 WL 3289861,
at *11.

1 Finally, in the most recent ruling issued on December 18, 2025, the District
2 Court noted that the core holding of *Yajure Hurtado* cannot be squared with the
3 MSJ Order. *See Yajure-Hurtado*, 29 I&N Dec. at 220-28 (subjecting non-citizens
4 present in the United States without inspection to §1225 and denying them
5 volunteer hearings for lack of jurisdiction). In spite of *Yajure-Hurtado*, this Court
6 petitioners and those similarly situated are not “applicants for admission”, and
7 therefore not subject to mandatory detention under §1225. [MSJ Order at 12-17].
8 *See Loper Bright Enters v. Raimondo*, 603 U.S. 369, 398-99 (2024)(requiring
9 courts “to ignore, not follow, ‘the reading the court would have reached’ had it
10 exercised its own independent judgement). Although the MSJ Order does not grant
11 vacatur of *Yajure Hurtado* under the APA, *Yajure Hurtado* is no longer
12 controlling; the legal conclusion underlying the decision is no longer tenable.
13 *Lazaro Maldonado Bautista v. Santacruz*, 5:25-CV-01873-SSS-BFM (C.D. Cal.).
14 The Court then went on to grant class wide vacatur of the unlawful DHS policy.

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21 At a minimum, based on this nationwide class certification and ruling,
22 Respondent is eligible for bond under INA §236(a).

23
24 The refusal to allow a bond redetermination in this matter violates both the
25 Immigration and Nationality Act and the Due Process Clause of the Fifth
26 Amendment. Petitioner now seeks a temporary restraining order (“TRO”) requiring
27 Respondents to release Petitioner. Expedited relief is necessary to prevent further
28 irreparable injury.

1 Petitioner requests that this Court issue a TRO and Order to Show Cause
2 re: Preliminary Injunction in the form of the proposed order submitted
3
4 concurrently with this Application. This Application is based on the Petition for
5 Writ of Habeas Corpus and exhibits in support thereof
6
7

8 Dated: December 29, 2025

/s/ Mardy M. Sproule

9
10 Mardy M. Sproule, *Attorney for Petitioner*
11 *Nelson Arreaga Meza*
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TABLE OF CONTENTS

I. INTRODUCTION10

II. STATEMENT OF FACTS12

III. ARGUMENT15

 A. PETITIONER IS LIKELY TO SUCCEED ON THE MERITS OF HIS CLAIMS..... 16

 1. Unlawful Revocation of Release.....16

 2. Petitioner Is Not Subject to Mandatory Detention.....19

 B. PETITIONER WILL SUFFER IRREPARABLE HARM IN THE ABSENCE OF A TRO.21

 C. THE BALANCE OF EQUITIES TIPS IN PETITIONER’S FAVOR AND A TRO IS IN THE PUBLIC INTEREST.23

 D. PRUDENTIAL EXHAUSTION IS NOT REQUIRED.24

 1. Futility25

 2. Irreparable Injury.....26

 E. THERE IS NO JURISDICTIONAL HURDLE BARRING RELIEF28

IV. CONCLUSION 29

1
2
3
4
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2001).....16

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8 C.F.R. §241.5(a).....2
8 C.F.R. §241.4(l).....10, 15, 16, 17, 18, 27
8 U.S.C. §1225(a)(1).....19, 20
8 U.S.C. §1225(b)(2).....18, 19, 20, 21, 27
8 U.S.C. §1225(b)(2)(A).....3, 10, 19, 20, 24, 25
8 U.S.C. §1226(a).....3, 9, 11, 18, 22, 25, 27
8 U.S.C. §1225(b)(1)(A)(i).....20
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8 U.S.C. §2948.1.....22
8 U.S.C. §1252(b)(9)..... 28

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I. INTRODUCTION

Petitioner, Mr. Arreaga Meza, seeks a TRO that requires Respondents to release him from custody or in the alternative provide him with a bond hearing pursuant to 8 U.S.C. §1226(a), within seven days of the issuance of a TRO.

Mr. Arreaga Meza is a citizen of Guatemala who entered the United States in 1999 without inspection. He has a set of 18 year old United States citizens twins, David and Reyna Arreaga-Gonzalez, who depend on him.

Mr. Arreaga Meza has been in removal proceedings since July 24, 2012. At the point that he came into removal proceedings, he had already been living in the United States for approximately 13 years. On July 24, 2012, he was released on order of supervision under 8 C.F.R. §214.5(a) on a program called ATD-ISAP and was compliant with the conditions of the program through 2015 when his case was administratively closed by the Immigration Judge. In 2015, he was never told that he had failed to comply nor did ICE ever take any steps to revoke his release. Instead, upon administrative closure of his removal proceedings, he was instructed by ICE that he was no longer required report to ATD-ISAP unless the Immigration Court recalendared his proceedings .

On June 29, 2025, he was re-detained without warning, without a formal or informal interview, without a hearing, without explanation, and with no procedural step to revisit that prior determination in violation of 8 C.F.R. §241.4.


1 and practice.” *Lepe v. Andrews*, __ F. Supp. 3d __, 2025 WL 2716910, at *4 (E.D.
2 Cal. Sept. 23, 2025) (citing cases).

3
4 Respondents’ legal interpretation set forth in their new policy is plainly
5 contrary to the statutory framework and contrary to decades of agency practice
6 applying §1226(a) to people like Petitioner. Respondents’ policy and the
7 resulting ongoing detention of Petitioner without a bond hearing is depriving
8 Petitioner of statutory and constitutional rights and unquestionably constitutes
9 irreparable injury.
10

11
12 Petitioner therefore seeks a TRO enjoining Respondents from continuing
13 to detain him and asks the Court to order his immediate release or a bond hearing
14 under 8 U.S.C. §1226.
15

16 Petitioner also seeks an Order prohibiting Respondents from relocating
17 Petitioner outside of the District of Arizona pending final resolution of this
18 litigation.
19

20 **II. STATEMENT OF FACTS**

21
22 Petitioner, Nelson Geovanni Arreaga Meza, was born on .
23 He entered the United States in 1999 without inspection. His life partner joined
24 him in the United States in 2000. They have settled here together since then.
25 They have five children together: Otto Arreaga Gonzalez, 29; Nelson Arreaga
26 Gonzalez, 27; Danitza Arreaga Gonzalez, 25; and twins David and Reyna
27 Arreaga Gonzalez, 18. The twins are United States citizens.
28

1 Petitioner lived another 10 years in the United States before he was re-
2 detained by ICE. Since his re-detention, the government has failed to inform Mr.
3 Arreaga Meza why it was revoking his release of a program that they themselves
4 told him to no longer report to in 2015.
5

6 Further, after re-detaining him, ICE/ERO has not taken the proper steps to
7 ensure that the Office of the Principal Legal Advisor (“OPLA”) inform the
8 Immigration Court that Mr. Arreaga Martinez was in their custody. As a result,
9 Mr. Arreaga Meza’s case appears to have been recalendared by the Executive
10 Office for Immigration Review (“EOIR”), Immigration Court, on the non-
11 detained docket and scheduled for August 31, 2027, while he remains detained in
12 ICE custody.
13

14 Consequently, extraordinary intervention is necessary. The denial of bond
15 to the Petitioner and his ongoing detention based on the new DHS policy violates
16 the plain language of the INA, 8 U.S.C. §1101 *et seq.* See *Lazaro Maldonado*
17 *Bautista et al v. Gabriel Santacruz Jr et al.*, 5:25-cv-01873-SSS-BFM, Dkt # 14
18 (C.D. Ca. Jul. 28, 2025); *Rodriguez v. Bostock*, No. 3:25-CV-05240-TMC, 2025
19 WL 1193850, at *16 (W.D. Wash. Apr. 24, 2025). A multitude of cases that have
20 concluded that applying Section 1225 in this situation “(1) disregards the plain
21 meaning of section 1225(b)(2)(A); (2) disregards the relationship between
22 sections 1225 and 1226; (3) would render a recent amendment to section 1226(c)
23 superfluous; and (4) is inconsistent with decades of prior statutory interpretation
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1 In July 2010, a domestic dispute occurred between Mr. Arreaga and his
2 partner. The police were involved and he was taken into custody to diffuse the
3 situation. *Exhibit 1: Declaration of Nelson Arreaga Meza*. No charges were filed
4 against him. *Exhibit 2: Certificate of Clerk Re: Name Search Results*. From the
5 police station, an ICE detainer was placed on him and he was turned over to ICE
6 custody. On July 24, 2012, removal proceedings were initiated against him with
7 the issuance of a putative Notice to Appear. *Exhibit 3: Notice to Appear*. DHS
8 charged him with being present in the United States without admission, in
9 violation of 8 U.S.C. §1182(a)(6)(A)(i). Having been found by an ICE
10 authorizing official to: (1) not to be subject to mandatory detention; (2) not to be
11 a threat to national security, public health or safety; and (3) not a flight risk he
12 was released from custody under an order of supervision, specifically, ICE's
13 ATD program.

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19 ATD exists to ensure compliance with release conditions and provides
20 important case management services for non-detained non-citizens. ATD consists
21 of Intensive Supervision Appearance Program ("ISAP"). The ATD-ISAP
22 program utilizes case management and technology tools to support non-citizens'
23 compliance with release conditions while on the non-detained docket. ATD-ISAP
24 enables non-citizens to remain in their communities, contributing to their families
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1 and community organizations, or concluding their affairs in the US, as they move
2 through the immigration proceedings or prepare for departure.¹
3

4 From 2012 through 2015, he regularly reported with ATD-ISAP to the best
5 of his abilities. *Exhibit 1*. From 2012-2015, he was never warned or informed that
6 he had violated the terms or conditions of the program. On July 23, 2015, the IJ
7 granted an unopposed motion to administratively close his removal proceedings.
8 *Exhibit 4: Administrative Closure Order*. At his following ATD-ISAP reporting,
9 he was advised by ICE that he was no longer required to report unless and until
10 his case was recalendared by the IJ. *Exhibit 1*. Mr. Arreaga Meza has continued
11 to live, work and contribute to his community with his valid employment
12 authorization (“EAD”) since then. *Exhibit 5: Approval Notice of Employment*
13 *Authorized from 9/12/2024-9/11/2029*.
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18 On June 29, 2025, Mr. Arreaga’s son, Otto Arreaga Gonzalez appeared in
19 state court related to a traffic citation. When he failed to return home, Mr.
20 Arreaga Meza went to the police station to inquire about his son. The police
21 asked him for identification. He presented his valid driver’s license and valid
22 EAD. *Exhibit 1*. The police then contacted ICE, who then re-detained Mr.
23 Arreaga Meza and was told that his case would be re-calendared. However, at no
24 time was he informed why his release was being revoked or why he was being re-
25 detained. *Exhibit 1*.
26
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¹ <https://www.ice.gov/features/atd>

1 Moreover, after re-detaining him neither ICE/ERO nor OPLA have taken the the
2 proper steps to inform the Immigration Court that Mr. Arreaga Martinez is in ICE
3 custody as EOIR has not received a Form I-830 Notice to EOIR: Alien Address
4 from ICE or OPLA. *Exhibit 6: Email Correspondence between counsel and Eloy,*
5 *Arizona ICE Outreach.* As a result, Mr. Arreaga Meza's case appears to have been
6 improperly recalendared by EOIR on the non-detained docket rather than the
7 detained docket. Consequently, his next hearing is scheduled to be heard well over
8 two years from when he was re-detained, on August 31, 2027. *Exhibit 7: EOIR*
9 *Automated Case Information.* If a detainee has pending proceedings before the
10 EOIR, ICE *must* submit Form I-830, Notice to EOIR: Alien Address. *Exhibit 8:*
11 *ICE Policy 11022.1, Detainee Transfers.* Had ICE or OPLA properly submitted the
12 Form I-830 to EOIR, it would have alerted EOIR that Mr. Arreaga Meza is in ICE
13 custody and the court could then transfer his case from the non-detained to a
14 detained docket ensuring his constitutionally protected right to a fair hearing free
15 of unreasonable delays. Instead, their actions have further contributed to
16 prolonging Mr. Arreaga Meza's unlawful detention.

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Petitioner has now been detained in immigration custody without a right to
be released on DHS's own custody determination in 2012, no change in
circumstances, and over two decades of residence in the United States.

III. ARGUMENT

1 The requirements for granting a TRO are “substantially identical” to those
2 for granting a preliminary injunction. *Stuhlberg Int’l Sales Co. v. John D. Brush*
3 & Co., 240 F.3d 832, 839 n.7 (9th Cir. 2001).

4
5 Petitioner must demonstrate that (1) he is likely to succeed on the merits of
6 his claims; (2) he is likely to suffer irreparable harm in the absence of preliminary
7 relief; (3) the balance of equities tips in his favor; and (4) an injunction is in the
8 public interest. *Winter v. Nat. Res. Def. Council*, 555 U.S. 7, 22 (2008). A sliding
9 scale test may be applied and an injunction should be issued when there is a
10 stronger showing on the balance of hardships, even if there are “serious questions
11 on the merits ... so long as the plaintiff also shows a likelihood of irreparable
12 harm and that the injunction is in the public interest.” *All. for the Wild Rockies v.*
13 *Cottrell*, 632 F.3d 1127, 1135 (9th Cir. 2011); *see also Flathead-Lolo-Bitterroot*
14 *Citizen Task Force v. Montana*, 98 F.4th 1180, 1190 (9th Cir. 2024).

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19 Petitioner satisfies the criteria and a TRO should be granted.

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21 A. PETITIONER IS LIKELY TO SUCCEED ON THE MERITS OF HIS
22 CLAIM.

23 Petitioner is likely to succeed on his claim that his ongoing detention by
24 Respondents is unlawful.

25
26 1. Unlawful Revocation of Release

27 On July 24, 2012, Petitioner was released under an order of supervision
28 program (ATD-ISAP) governed by 8 C.F.R. §241.4(I). An alien released
pursuant to 8 C.F.R. §241.4(I) shall be released pursuant to an order of

1 supervision. The Commissioner, Deputy Commissioner, Executive Associate
2 Commissioner Field Operations, regional director, district director, acting district
3 director, deputy district director, assistant district director for investigations,
4 assistant district director for detention and deportation, or officer-in-charge...
5 shall specify conditions of supervision including, but not limited to, the
6 following: (1) a requirement that the alien report to a specified officer
7 periodically and provide relevant information under oath as directed. Alongside
8 the regulations establishing conditions of release are the regulations establishing
9 the *revocation* of that release. 8 C.F.R. §241.4(l). In other words, to revoke
10 release the government must notify the noncitizen of the reason for the revocation
11 and give them both an informal and formal interview. Here, none of that required
12 process was followed.

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18 When Mr. Arreaga Meza went to the police station in Havasu to inquire
19 about his son after he failed to return home from a court hearing, he was asked
20 for identification. *Exhibit 1*. Upon providing his valid driver's license and valid
21 employment authorization card, ICE was alerted (presumably because he is not a
22 United States citizen), and ICE re-detained him without explanation other than
23 that his case would be recalenared. To his knowledge, he complied with the terms
24 of his order of supervision while he was actively on the program from 2012-2015
25 and after he was advised by ICE that he was no longer required to report because
26 his case had been administratively closed 2015. He had never been told otherwise
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28

1 by ICE. At no time between 2012 and 2025 was non-compliance an issue. At no
2 time was he afforded an informal or formal revocation interview between 2012-
3 2025. In other words, under 8 C.F.R. §241.4 the government has had a period of
4 13 years to give Mr. Arreaga Meza a formal or informal interview if they wanted
5 to lawfully revoke his conditions of release, and they have failed to do so.
6
7

8 This failure by the government is in clear violation of the due process
9 requirements of 8 C.F.R. §241.4(l). It is well established that government
10 agencies are required to follow their own regulations. *United States ex rel*
11 *Accardi v. Shaughnessy*, 347 U.S. 260, 268 (1954). A growing number of courts
12 have unequivocally found that the government’s failure to follow its release
13 revocation procedures—in particular the failure to give a detainee the required
14 notice and interview—renders the re-detention unlawful. *See Hoac v. Becerra*,
15 No. 2:25-cv-01740-DC-JDP, 2025 WL 1993771, at *4 (E.D. Cal. July 16, 2025)
16 (“Because there is no indication that an informal interview was provided to
17 Petitioner, the court finds Petitioner is likely to succeed on his claim that his re-
18 detainment was unlawful.”); *Ceesay v. Kurzdorfer*, No. 25- cv-267-LJV, 2025
19 WL 1284720, at *21 (W.D.N.Y. May 2, 2025) (“[B]ecause ICE did not follow its
20 own regulations in deciding to re-detain Ceesay, his due process rights were
21 violated, and he is entitled to release.”); *Liu v. Carter*, No. 25-3036-JWL, 2025
22 WL 1696526, at *3 (D. Kan. June 17, 2025) (“[B]ecause officials did not
23 properly revoke petitioner’s release pursuant to the applicable regulations, that
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1 revocation has no effect, and petitioner is entitled to release.”); *Rombot v. Souza*,
2 296 F. Supp. 3d 383, 387–88 (D. Mass. 2017) (holding that ICE’s failures to
3 follow the release revocation procedures in 8 C.F.R. §241.4 rendered the
4 petitioner’s detention unlawful).
5

6 The procedures outlined in 8 C.F.R. §241.4(l) are not optional or
7 discretionary, they *must* be followed and failure to do so renders this detention
8 unlawful. For this reason, we ask the Court to find that Mr. Arreaga Meza is
9 likely to succeed on his claim that the government did not properly revoke his
10 release pursuant to 8 C.F.R. §241.4(l).
11

12 2. Petitioner Is Not Subject To Mandatory Detention.

13

14 Further, the plain text of §1226 demonstrates that subsection (a) applies to
15 Petitioner. 8 U.S.C. §1225(b)(2) should not be read to apply to everyone who is
16 in the United States “who has not been admitted.” Section 1226(a) covers those
17 who are present within and residing within the United States and who are not at
18 the border seeking admission. The text of §1225 reinforces this interpretation. As
19 the Supreme Court recognized, §1225 is concerned “primarily [with those]
20 seeking entry,” *Jennings v. Rodriguez*, 583 U.S. 281, 297 (2018), i.e., cases “at
21 the Nation’s borders and ports of entry, where the Government must determine
22 whether a[] [noncitizen] seeking to enter the country is admissible,” *id.* at 287.
23

24 Paragraphs (b)(1) in §1225 concerns “expedited removal of inadmissible
25 arriving [noncitizens]”—encompasses only the “inspection” of certain “arriving”
26
27
28

1 noncitizens and other recent entrants the Attorney General designates, and only
2 those who are “inadmissible under section 1182(a)(6)(C) or §1182(a)(7).” 8
3 U.S.C. §1225(b)(1)(A)(i). These grounds of inadmissibility are for those who
4 misrepresent information to an examining immigration officer or do not have
5 adequate documents to enter the United States. Thus, subsection (b)(1)’s text
6 demonstrates that it is focused only on people arriving at a port of entry or who
7 have recently entered the United States and not those already residing here.
8
9

10
11 Paragraph (b)(2) in §1225 is similarly limited to people applying for
12 admission when they arrive in the United States. The title explains that this
13 paragraph addresses the “[i]nspection of other [noncitizens],” i.e., those
14 noncitizens who are “seeking admission,” but who (b)(1) does not address. *Id.*
15 §1225(b)(2), (b)(2)(A). By limiting (b)(2) to those “seeking admission,”
16 Congress confirmed that it did not intend to sweep into this section individuals
17 like Petitioner, who entered over two decades ago and has been residing
18 continuously in the United States without interruption for said decades. An
19 individual submits an “application for admission” only at “the moment in time
20 when the immigrant actually applies for admission into the United States.” *Torres*
21 *v. Barr*, 976 F.3d 918, 927 (9th Cir. 2020) (en banc). Indeed, in *Torres*, the *en*
22 *banc* Court of Appeals rejected the idea that §1225(a)(1) means that anyone who
23 is presently in the United States without admission or parole is someone “deemed
24 to have made an actual application for admission.” *Id.* (*emphasis omitted*). That
25
26
27
28

1 holding is instructive here too, as only those who take affirmative acts, like
2 submitting an “application for admission,” are those who can be said to be
3 “seeking admission” within §1225(b)(2)(A). Otherwise, that language would
4 serve no purpose, violating a key rule of statutory construction. *See Shulman*, 58
5 F.4th at 410–11.
6

7
8 Here, Petitioner is being classified as an applicant for admission despite his
9 arrest in the interior of the United States the first time 13 years after his entry;
10 and the second time 26 years after his entry and after uninterrupted continuous
11 physical presence. DHS and EOIR are trying to apply a new policy to an existing
12 NTA that was issued in 2012.
13

14
15 Significantly, in deeming that all noncitizens who entered without
16 inspection are necessarily encompassed by the mandatory detention provision at
17 §1225(b)(2), the DHS and EOIR policy ignores that the provision does not
18 simply address applicants for admission. The new policy and the IJs’
19 implementation ignore the statutory language in §1226 that expressly
20 encompasses persons who have entered the United States and are present without
21 admission. Thus, Petitioner will prevail regardless of the scope of §1225(a)(1)’s
22 definition of “applicant for admission.”
23
24
25

26 **B. PETITIONER WILL SUFFER IRREPARABLE HARM IN THE**
27 **ABSENCE OF A TRO.**

28 “It is well established the deprivation of constitutional rights
‘unquestionably constitutes irreparable injury.’” *Melendres v. Arpaio*, 695 F.3d

1 990, 1002 (9th Cir. 2012) (quoting *Elrod v. Burns*, 427 U.S. 347, 373 (1976)).

2 Where, as here, the “alleged deprivation of a constitutional right is involved,
3 most courts hold that no further showing of irreparable injury is necessary.”

4
5 *Warsoldier v. Woodford*, 418 F.3d 989, 1001–02 (9th Cir. 2005) (quoting Wright,
6 Miller, & Kane, *Federal Practice and Procedure*, §2948.1 (2d ed. 2004)). To be
7 sure, “unlawful detention certainly constitutes ‘extreme or very serious’” injury
8 which “is not compensable in damages.” *Hernandez v. Sessions*, 872 F.3d 976,
9 1000 (9th Cir. 2017). Mr. Arreaga Meza’s revocation of release is a violation of
11 due process (*i.e.*, notice and an opportunity to be heard regarding the revocation
12 of his release), rendering his continued and prolonged re-detention unlawful.
13
14

15
16 In the absence of a TRO, Petitioner will continue to be unlawfully detained
17 by Respondents pursuant to §1225(b)(2) and denied bond before an IJ. Petitioner
18 has now been in ICE detention for 6 almost months, partially due to ICE/ERO
19 and OPLA’s failure to properly notify the EOIR of his custody status. His
20 dependent United States citizen son suffers from a serious medical condition.

21
22 *Exhibit 1*. “Freedom from imprisonment—from government custody, detention,
23 or other forms of physical restraint—lies at the heart of the liberty” that the Due
24 Process Clause protects. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Detention
25 constitutes “a loss of liberty that is . . . irreparable.” *Moreno Galvez v. Cuccinelli*,
26 492 F. Supp. 3d 1169, 1181 (W.D. Wash. 2020) (*Moreno II*), *aff’d in part*,
27 *vacated in part on other grounds, remanded sub nom. Moreno Galvez v. Jaddou*,
28

1 52 F.4th 821 (9th Cir. 2022) (“Thus, it follows inexorably from our conclusion
2 that the government's current policies [which fail to consider financial ability to
3 pay immigration bonds] are likely unconstitutional—and thus that members of
4 the plaintiff class will likely be deprived of their physical liberty
5 unconstitutionally in the absence of the injunction—that Plaintiffs have also
6 carried their burden as to irreparable harm.”); *Maldonado Bautista et al. v.*
7 *Santacruz, et al.*, No. 5:25-cv- 01873-SSS-BFM (C.D. Calif. July 28, 2025),
8 Order Granting Temporary Restraining Order, Dkt. 14 at 9 (“[T]he Court finds
9 that the potential for Petitioners’ continued detention without an initial bond
10 hearing would cause immediate and irreparable injury, as this violates statutory
11 rights afforded under §1226(a).”).

12
13
14
15
16
17 C. THE BALANCE OF EQUITIES TIPS IN PETITIONER’S FAVOR
18 AND A TRO IS IN THE PUBLIC INTEREST.

19 Because the government is a party, these two factors are considered
20 together. *Nken v. Holder*, 556 U.S. 418, 435 (2009). Petitioner has established
21 that the public interest factors weigh in his favor because his claims assert that
22 the new policy has violated federal laws. *See Valle del Sol Inc. v. Whiting*, 732
23 F.3d 1006, 1029 (9th Cir. 2013). Because the policy preventing Petitioner from
24 obtaining bond “is inconsistent with federal law, . . . the balance of hardships and
25 public interest factors weigh in favor of a preliminary injunction.” *Moreno*
26 *Galvez v. Cuccinelli*, 387 F. Supp. 3d 1208, 1218 (W.D. Wash. 2019) (*Moreno I*);
27 *see also Moreno Galvez*, 52 F.4th 821, 832 (9th Cir. 2022) (affirming in part
28

1 permanent injunction issued in *Moreno II* and quoting approvingly district
2 judge's declaration that "it is clear that neither equity nor the public's interest are
3 furthered by allowing violations of federal law to continue"). This is because "it
4 would not be equitable or in the public's interest to allow the [government] . . . to
5 violate the requirements of federal law, especially when there are no adequate
6 remedies available." *Valle del Sol Inc. v. Whiting*, 732 F.3d 1006, 1029 (9th Cir.
7 2013) (second alteration in original) (citation omitted). Indeed, Respondents
8 "cannot suffer harm from an injunction that merely ends an unlawful practice."
9 *Rodriguez v. Robbins*, 715 F.3d 1127, 1145 (9th Cir. 2013).

10 D. PRUDENTIAL EXHAUSTION IS NOT REQUIRED.

11 Prudential exhaustion does not require Petitioner to be forced to endure the
12 very harm he is seeking to avoid by having to appeal an IJ bond order to the BIA
13 and waiting many months for a decision from the BIA, when the BIA will rely on
14 its own precedent of *Yajure-Hurtado, supra*. "[T]here are a number of exceptions
15 to the general rule requiring exhaustion, covering situations such as where
16 administrative remedies are inadequate or not efficacious, . . . [or] irreparable
17 injury will result . . ." *Laing v. Ashcroft*, 370 F.3d 994, 1000 (9th Cir. 2004)
18 (citation omitted). In addition, a court may waive an exhaustion requirement
19 when "requiring resort to the administrative remedy may occasion undue
20 prejudice to subsequent assertion of a court action." *McCarthy v. Madigan*, 503
21 U.S. 140, 146–47 (1992), *superseded by statute on other grounds as stated in*

1 *Booth v. Churner*, 532 U.S. 731, 739–41 (2001). “Such prejudice may result . . .
2 from an unreasonable or indefinite time frame for administrative action.” *Id.* at
3
4 147 (citing cases). Here, the exceptions regarding irreparable injury and agency
5 delay apply and warrant waiving any prudential exhaustion requirement.

6
7 1. Futility

8 Futility is an exception to the prudential exhaustion requirement. Petitioner
9 has been subjected to the new Department of Homeland Security (DHS) policy
10 issued on July 8, 2025, instructing all ICE officers to treat any person arrested
11 within the United States and charged under 8 U.S.C. §1182(a)(6)(A)(i) as an
12 “applicant for admission” under 8 U.S.C. §1225(b)(2)(A) and therefore subject to
13
14 “applicant for admission” under 8 U.S.C. §1225(b)(2)(A) and therefore subject to
15 mandatory detention. This policy was issued “in coordination with the DOJ”
16 according to the agency’s memorandum titled Interim Guidance Regarding
17
18 Detention Authority for Applicants for Admission (ICE, July 8, 2025).

19 Because IJ’s operate within the EOIR—a component of the DOJ—the new
20
21 DHS policy has effectively bound all immigration courts. Petitioner has been
22 denied the bond by EOIR, which has been uniformly applied nationwide to
23 individuals charged under §1182(a)(6)(A)(i), even when, as here, the arrest
24
25 occurred deep within the interior of the United States decades after his entry.

26 On September 5, 2025, the BIA issued a precedential decision in *Matter of*
27 *Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), explicitly holding that individuals
28 who entered the United States without inspection are subject to mandatory

1 detention under 8 U.S.C. §1225(b)(2)(A) and that IJs lack jurisdiction to conduct
2 bond redetermination hearings in such cases.

3
4 On November 20, 2025, the United States District Court, Central District
5 of California granted partial summary judgment on behalf of individual plaintiffs
6 and on November 25, 2025, certified a nationwide class and extended declaratory
7 judgment to the certified class. *Maldonado Bautista v. Santacruz*, No. 5:25-CV-
8 01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3289861, at *11 (C.D. Cal. Nov.
9 20, 2025) . The declaratory judgment held that the Bond Denial Class members
10 are detained under 8 U.S.C. §1226(a) and thus may not be denied consideration
11 for release on bond under §1225(b)(2)(A). *Maldonado Bautista*, 2025 WL
12 3289861, at *11.
13
14

15
16 In response to this, IJ's have informed class members currently in
17 detention seeking bond hearings that they (the IJ's) have been instructed by
18 "leadership" that the declaratory judgment in *Maldonado Bautista* is not
19 controlling, even with respect to class members, and that instead IJs remain
20 bound to follow the agency's prior decision in *Matter of Yajure Hurtado*, 29 I. &
21 N. Dec. 216 (BIA 2025).
22
23
24

25 Petitioner therefore has no further available administrative remedy and
26 properly invokes this Court's habeas jurisdiction to challenge his unlawful
27 detention and the categorical denial of a bond hearing.
28

2. Irreparable Injury

1 Irreparable injury is an exception to any prudential exhaustion requirement.
2 Because Petitioner was denied bond and ordered mandatorily detained, each day
3 he remains in detention is one in which his statutory and constitutional rights
4 have been violated. Similarly situated district courts have repeatedly recognized
5 this fact. As one court has explained, “because of delays inherent in the
6 administrative process, BIA review would result in the very harm that the bond
7 hearing was designed to prevent: prolonged detention without due process.”
8 *Hechavarria v. Whitaker*, 358 F. Supp. 3d 227, 237 (W.D.N.Y. 2019) (internal
9 quotation marks omitted). Indeed, “if Petitioner is correct on the merits of his
10 habeas petition, then Petitioner has *already* been unlawfully deprived of a
11 [lawful] bond hearing [,] [and] . . . each additional day that Petitioner is detained
12 without a [lawful] bond hearing would cause him harm that cannot be repaired.”
13 *Villalta v. Sessions*, No. 17-CV-05390-LHK, 2017 WL 4355182, at *3 (N.D. Cal.
14 Oct. 2, 2017) (internal quotation marks and brackets omitted); *see also Cortez v.*
15 *Sessions*, 318 F. Supp. 3d 1134, 1139 (N.D. Cal. 2018) (similar). Other district
16 courts have echoed these points.²

24 ² *See, e.g., Perez v. Wolf*, 445 F. Supp. 3d 275, 286 (N.D. Cal. 2020); *Blandon v.*
25 *Barr*, 434 F.Supp. 3d 30, 37 (W.D.N.Y. 2020); *Marroquin Ambriz v. Barr*, 420 F.
26 Supp. 3d 953, 961 (N.D. Cal. 2019); *Ortega-Rangel v. Sessions*, 313 F. Supp. 3d
27 993, 1003–04 (N.D. Cal. 2018); *Montoya Echeverria v. Barr*, No. 20-CV-02917-
28 JSC, 2020 WL 2759731, at *6 (N.D. Cal. May 27, 2020); *Rodriguez Diaz v. Barr*,
No. 4:20-CV-01806-YGR, 2020 WL 1984301, at *5 (N.D. Cal. Apr. 27, 2020);
Birru v. Barr, No. 20-CV-01285-LHK, 2020 WL 1905581, at *4 (N.D. Cal. Apr.
17, 2020); *Lopez Reyes v. Bonnar*, No. 18-CV-07429-SK, 2018 WL 7474861, at
*7 (N.D. Cal. Dec. 24, 2018).

1 Petitioner asserts both statutory and constitutional claims and has a
2 “fundamental” interest in a bond hearing, as “freedom from imprisonment is at
3 the ‘core of the liberty protected by the Due Process Clause.’” *Hernandez*, 872
4 F.3d at 993 (quoting *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)).
5

6 E. THERE IS NO JURISDICTIONAL HURDLE BARRING RELIEF
7

8 Finally, nothing in the Immigration and Nationality Act precludes this
9 Court from granting the TRO. The “zipper clause” at 8 U.S.C. §1252(b)(9),
10 which channels “[j]udicial review of all questions of law . . . including
11 interpretation and application of constitutional and statutory provisions, arising
12 from any action taken . . . to remove an alien from the United States” to the
13 appropriate federal court of appeals, does not apply because that section applies
14 only to review of removal orders, and Petitioner does not seek review of orders of
15 removal but of custody. *Maldonado Bautista et al. v. Santacruz, et al.*, No. 5:25-
16 cv-01873-SSS-BFM (C.D. Calif. July 28, 2025), Order Granting Temporary
17 Restraining Order, Dkt. 14 at 4-5.
18

19 Petitioner does not challenge Respondents authority to remove him from
20 the United States. He challenges the revocation of his release in violation of 8
21 C.F.R. §241.4(l) and his classification under 8 U.S.C. §1225(b)(2) instead of
22 §1226(a). Thus, §1252(b)(9) does not provide a jurisdictional bar.
23

24 As such, the Court has jurisdiction over Petitioner’s challenge to his
25 detention.
26
27
28

CONCLUSION

For the foregoing reasons, the Court should grant Petitioner's Application for a Temporary Restraining Order and Order to Show Cause.

Dated: December 29, 2025

Respectfully Submitted,
S/ Mardy M. Sproule

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

EXHIBIT INDEX

EXHIBITS

PAGE

EX. 1	DECLARATION OF NELSON ARREAGA MEZA	30-34
EX. 2	CERTIFICATE OF CLERK RE: NAME SEARCH RESULTS	35
EX. 3	NOTICE TO APPEAR	36
EX. 4	ADMINISTRATIVE CLOSURE NOTICE	37
EX. 5	APPROVAL NOTICE OF EMPLOYMENT AUTHORIZED FROM 09/12/2024 – 09/11/2029	38
EX. 6	EMAIL CORRESPONDENCE BETWEEN COUNSEL AND ELOY, ARIZONA ICE OUTREACH	39
EX. 7	EOIR AUTOMATED CASE INFORMATION	40
EX. 8	ICE POLICY 11022.1, DETAINEE TRANSFER	41-54

1
2
3
4
5
6
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**EX. 1 DECLARATION OF
NELSON 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 and my valid work permit that is set to expire in 2029. The police officer called the ICE officer over. ICE looked at my work permit and told me that my case was going to be recalendared and that I was going to be arrested without more explanation.

21. After I was re-detained, at no time was I told why my release was bring revoked, why I was being re-detained. I was not provided with a formal or informal interview before or after being re-detained.
22. I have been detained at the Eloy Federal Center Facility (Core Civic) in Eloy, Arizona since June 29, 2025.
23. I do not have any criminal convictions.
24. If released, I will be reunited with my wife and his children.
25. My entire family has been negatively impacted by my prolonged detention.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

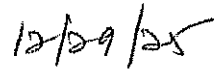
/Signature/

Nelson Geovanni Arreaga Meza//

I CERTIFY THAT THE ABOVE IS A COMPLETE AND ACCURATE TRANSLATION OF THE ATTACHED DOCUMENT. I FURTHER CERTIFY THAT I AM A TRANSLATOR CONVERSANT IN BOTH ENGLISH AND SPANISH, COMPETENT TO TRANSLATE THE ATTACHED DOCUMENT AND THE TRANSLATION IS TRUE AND CORRECT TO THE BEST OF MY ABILITIES.



KARLA DE LA TORRE
TRANSLATOR



DATE

DECLARACION DE NELSON GEOVANNI ARREAGA MEZA

Yo, Nelson Geovanni Arreaga Meza, siendo mayor de dieciocho años y en pleno uso de mis facultades mentales, por la presente declaro, bajo pena de perjurio y de conformidad con las leyes del estado de California, que lo siguiente es verdadero y correcto según mi leal saber y entender:


1. Soy originario y ciudadano de México.
2. Ingresé a los Estados Unidos en junio de 1999 sin inspección. No he salido del país desde esa fecha.
3. He estado en una relación amorosa y comprometida desde 1996; la considero mi esposa.
4. Mi pareja y yo tenemos cinco hijos, dos de los cuales son ciudadanos de los Estados Unidos: Otto Arreaga González, 29 años; Nelson Arreaga González, 27 años; Danitza Arreaga González, 25 años; y los gemelos David y Reyna Arreaga González, de 18 años.
5. Los gemelos son ciudadanos de los Estados Unidos.
6. En julio de 2010, ocurrió una disputa doméstica entre mi esposa y yo.
7. La policía intervino para calmar la situación y me llevó detenido. No se presentaron cargos en mi contra, pero fui transferido a ICE.
8. El 24 de julio de 2012, se iniciaron procedimientos de deportación en mi contra por haber ingresado al país sin inspección.
9. Tras haberse determinado que: (1) no estaba sujeto a detención obligatoria; (2) no representaba una amenaza para la seguridad nacional, la salud pública ni la seguridad pública; y (3) no existía riesgo de fuga, fui liberado bajo el programa de **Alternativas a la Detención** ("ATD").
10. Cumplí con el programa en la medida de mis posibilidades.
11. Reporté regularmente entre los años 2012 y 2015.
12. En ningún momento entre 2012 y 2015 se me informó que corría el riesgo de que mi programa ATD-ISAP fuera cancelado ni de que mi libertad fuera revocada.
13. En ningún momento entre 2012 y 2015 se me realizó una entrevista formal o informal para revisar la revocación de mi libertad.
14. Mi caso fue cerrado administrativamente por el Juez de Inmigración el 23 de julio de 2015.
15. Cuando acudí a mi siguiente cita de reporte del programa ATD-ISAP después de que mi caso fue cerrado, el oficial de ICE me informó que ya no necesitaba presentarme a reportar a menos y hasta que la Corte de Inmigración volviera a poner mi caso en el calendario.
16. Desde entonces he trabajado legalmente y he vivido en los Estados Unidos sin incidentes.
17. Nunca se me informó que no estuviera cumpliendo con la Corte o con el programa ATD, ni que fuera a ser nuevamente detenido por ningún motivo.
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 and my valid work permit that is set to expire in 2029. The police officer called the ICE officer over. ICE looked at my work permit and told me that my case was going to be recalendared and that I was going to be arrested without more explanation.
21. After I was re-detained, at no time was I told why my release was bring revoked, why I was being re-detained. I was not provided with a formal or informal interview before or after being re-detained.
22. El 29 de junio de 2025, mi hijo Otto tuvo una audiencia. Mi sobrino, Jorge, asistió a la audiencia con él para brindarle apoyo moral. Al salir Otto de la corte, agentes de ICE lo estaban esperando y lo arrestaron. Jorge tiene una solicitud de Ajuste de Estatus pendiente, por lo que pensó que sería seguro acompañar a Otto. A pesar de ello, Jorge también fue puesto bajo custodia de ICE únicamente por estar con Otto.
23. Cuando mi esposa y yo nos enteramos de que ambos habían sido puestos bajo custodia, acudí a la oficina local de ICE para preguntar qué había sucedido y qué iba a ocurrir con ellos. Llevaba conmigo mi número de caso en mi tarjeta de autorización de empleo (EAD), válida hasta 2029. Ese mismo día, también fui puesto bajo custodia de ICE sin ninguna explicación, únicamente por haber acudido a preguntar por mi hijo y mi sobrino.
24. He estado detenido en el Centro Federal de Detención de Eloy (CoreCivic), en Eloy, Arizona, desde el 29 de junio de 2025.
25. No tengo condenas penales.
26. En caso de ser liberado, me reuniré con mi esposa y mis hijos.
27. Toda mi familia se ha visto negativamente afectada por mi detención prolongada.

Declaro bajo pena de perjurio conforme a las leyes de los Estados Unidos de América que lo anterior es verdadero y correcto.

/Nelson Geovanni Arreaga-Meza/FIRMA ELECTRONICA/

**EX. 2 CERTIFICATE OF CLERK
RE: NAME SEARCH RESULTS**

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES	
COURTHOUSE ADDRESS: NORWALK COURTHOUSE 12720 NORWALK BLVD, NORWALK, CA 90650	
NAME SEARCHED: NELSON ARREAGA MEZA	CERTIFICATE OF CLERK RE: NAME SEARCH RESULTS
DATE OF BIRTH: 	

I, DAVID W. SLAYTON, Executive Officer/Clerk of Court of the Superior Court of California, County of Los Angeles, do hereby certify that I am the Custodian of Records of the Superior Court of California, County of Los Angeles, and that I have conducted a thorough search of all Court records, excluding those that are sealed pursuant to California Rules of Court, Rule 2.550, or are confidential by law,

from  for the above-referenced name, and that:
(YEAR/DATE) to (YEAR/DATE)

- I am unable to provide you with a copy of the case information/case number. The case information requested has been purged and/or destroyed pursuant to Court order. (G.C. 68152)
- My search has disclosed "NO CASE FILE" for the aforementioned name.
- My search has disclosed that the following case(s) was (were) filed involving the above-referenced name:

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

DATE: 12/18/2025

DAVID W. SLAYTON, Executive Officer/Clerk of Court



By: A. Cohen
Deputy Clerk

CERTIFICATE OF CLERK – NAME SEARCH RESULTS

EX. 3 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:

currently residing at:

[REDACTED ADDRESS]

(Number, street, city and ZIP code)

(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

(Date)

(Time)

charge(s) set forth above.

E SANTACRUZ

(Signature and Title of Issuing Officer)

Date: July 24, 2012

LOS ANGELES, CA

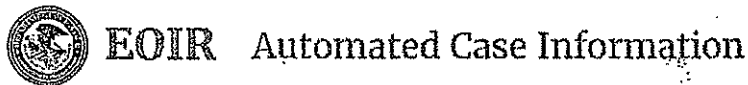
(City and State)

See reverse for important information

3p

**EX. 4 ADMINISTRATIVE
CLOSURE NOTICE**

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 | A-Number: [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

37


**EX. 5 APPROVAL NOTICE OF
EMPLOYMENT AUTHORIZED
FROM 09/12/2024 – 09/11/2029**

**EX. 6 EMAIL CORRESPONDENCE
BETWEEN COUNSEL AND ELOY,
ARIZONA ICE OUTREACH**

 To: Mardy Sproule >
December 26, 2025 at 8:22 AM

Yes, many times.

Respectfully,
EAZ Outreach

From: Mardy Sproule <mardy.sproule@att.net>
Sent: Monday, December 22, 2025 11:58 AM
To: EAZ-Outreach, <EAZ-Outreach@ice.dhs.gov>
Subject: Re: Nelson Arreaga Meza 

CAUTION: This email originated from outside of DHS. DO NOT click links or open attachments unless you recognize and/or trust the sender. Please use the Cofense Report Phishing button to report. If the button is not present, [click here](#) and follow instructions.

I have been advised by the immigration court that DHS has not filed a motion for a change of venue to the Eloy Immigration Court since Mr. Arreaga-Meza came into your custody on June 29, 2026. In the last 6 months, has ERO reached out to OPLA to notify them of his custody status so that OPLA could file the I-830 with the immigration court?

I will be filing a petition for writ of habeas corpus due to his unlawful prolonged detention and I would like to be clear as to what steps, if any, DHS has taken to mitigate this situation.

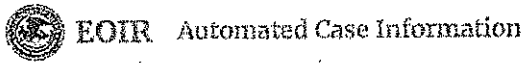
Best Regards,

Mardy Sproule

39

**EX. 7 EOIR AUTOMATED CASE
INFORMATION**

An official website of the United States government [Here's how you know](#)



Court Closures Today November 18, 2025

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

Home > MEZA, NELSON ARREAGA 



Automated Case Information

Name: MEZA, NELSON ARREAGA | A-Number: 


Next Hearing Information

Your upcoming MASTER hearing is on **August 31, 2027**
at **9:00 AM**.

JUDGE
Stancill, Christine E

COURT ADDRESS
5245 PACIFIC CONCOURSE DR #100
LOS ANGELES, CA 90045

Court Decision and Motion Information


This case is pending.

BIA Case Information

No appeal was received for this case.

Court Contact Information

If you require further information regarding your case, or wish to file additional documents, please contact the immigration court.

COURT ADDRESS