

3:26-cv-00111-RSH-BLM Lucas-Jacinto v. Larose et al

Robert S. Huie, presiding
Barbara Lynn Major, referral

Date filed: 01/08/2026

Date of last filing: 01/20/2026

History

Doc. No.	Dates	Description
<u>1</u>	<i>Filed & Entered:</i> 01/08/2026	 Petition for Writ of Habeas Corpus
<u>2</u>	<i>Filed:</i> 01/08/2026 <i>Entered:</i> 01/09/2026	 Order Setting Briefing Schedule - Habeas Corpus
<u>3</u>	<i>Filed & Entered:</i> 01/20/2026	 Notice of Appearance
<u>4</u>	<i>Filed & Entered:</i> 01/20/2026	 Return to Petition
<u>5</u>	<i>Filed & Entered:</i> 01/20/2026	 Order

1 Richard S. Sterger, Esq. (SBN 335832)
2 Sterger Law Group, P.C.
3 300 W. Grand Ave., Suite 200
4 Escondido, CA 92025
5 (760) 546-2111
6 rick@stergerlawgroup.com

7 Attorney for Petitioner
8 FIDEL LUCAS-JACINTO

9 UNITED STATE DISTRICT COURT
10 SOUTHER DISTRICT OF CALIFORNIA

11 FIDEL LUCAS-JACINTO,

12 Plaintiff,

13 v.

14 CHRISTOPHER J. LAROSE, Senior
15 Warden, Otay Mesa Detention Center;
16 DANIEL A. BRIGHTMAN, San Diego
17 Field Office Director, Immigration and
18 Customs Enforcement and Removal
19 Operations ("ICE/ERO"); TODD M.
20 LYONS, Acting Director of Immigration
21 Customs Enforcement ("ICE"); U.S.
22 Immigration and Customs Enforcement;
23 KRISTI NOEM, Secretary of the
24 Department of Homeland Security
25 ("DHS"); U.S. Department of Homeland
26 Security; and PAMELA BONDI,
27 Attorney General of the United States,

28 Respondents.

CASE NO.: '26CV0111 RSH BLM

**PETITION FOR WRIT OF HABEAS
CORPUS AND ORDER TO SHOW
CAUSE WITHIN THREE DAYS;
COMPLAINT FOR DECLARATORY
RELIEF**

Challenge to Unlawful Incarceration;
Request for Declaratory and Injunctive
Relief

1 Petitioner Fidel Lucas-Jacinto petitions this Court for a writ of habeas corpus
2 under 28 U.S.C. section 2241 to remedy Respondents' detaining him unlawfully, and
3 states as follows:

4 **INTRODUCTION**

- 5
- 6 1. Petitioner Fidel Lucas-Jacinto ("Petitioner" or "Mr. Lucas-Jacinto") is a fifty-five
7 year-old, Guatemalan, asylum seeker detained at Oaty Mesa Detention Center in
8 San Diego, California. He was persecuted in Guatemala including suffering
9 physical violence and threats of harm and violence because of his particular social
10 group and race.
 - 11
 - 12 2. On or about May 1, 2010, Petitioner entered at an unknown location. Respondents
13 arrested and detained Petitioner on or about April 19, 2018. On information and
14 belief, based on the individualized facts of Petitioner's case, the Executive Office
15 for Immigration Review (EOIR), a sub-office of the Department of Justice (DOJ),
16 ordered the release of the Petitioner from its custody on the minimum bond of
17 \$1500 pursuant to 8 CFR 236.1(c).
 - 18
 - 19 3. Petitioner was released from custody because bond was posted in the amount set
20 by the immigration judge.
 - 21
 - 22 4. On or about April 19, 2018, Respondents initiated removal proceedings against
23 Petitioner under 8 U.S.C. §1229a.
 - 24
 - 25 5. Respondents alleged that Petitioner is an alien present in the United States
26 without being admitted or paroled, or who arrived in the United States at a time
27
 - 28

1 or place other than as designated by the Attorney General pursuant to
2 212(a)(6)(A)(i) of the Immigration and Nationality Act.

3 6. Petitioner applied for asylum before the San Diego Immigration Court on August
4 22, 2019.

5
6 7. On December 14, 2021, after a hearing on the merits a removal order was issued.

7 8. On January 12, 2022, an appeal was filed before the Board of Immigration
8 Appeals. That appeal remains pending as of this filing.

9
10 9. On December 2, 2025, Mr. Lucas-Jacinto was arrested and detained by
11 Immigration and Customs Enforcement (ICE) officers despite there being no
12 change in his individual circumstances or current bond.

13 10. Immigration detention is civil in nature and it's permissible only to ensure a
14 noncitizen's appearance at immigration proceedings or to protect the community
15 from danger. DHS did not arrest or detain Mr. Lucas-Jacinto for either of these
16 legitimate purposes as he plainly poses neither a flight risk nor a danger to the
17 community.
18
19

20 JURISDICTION

21 11. This action arises under the Constitution of the United States and the
22 Immigration and Nationality Act (INA), 8 U.S.C. § 1101 et. seq.

23 12. This court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus),
24 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States
25 Constitution (Suspension Clause).
26
27
28

1 13. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et.
2 seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et. seq., the All Writs Act, 28
3 U.S.C. § 1651, and the Immigration and Nationality Act, 8 U.S.C. § 1252(e)(2).
4

5 **VENUE**

6 14. Venue is proper because Petitioner is in Respondents' custody in Otay Mesa,
7 California Venue is further proper because a substantial part of the events or
8 omissions giving rise to Petitioner's claims occurred in this District, where
9 Petitioner is now in Respondent's custody. 28 U.S.C. § 1391(e).
10

11 15. Courts have long recognized the significance of the habeas statute in protecting
12 individuals from unlawful detention. The Great Writ has been referred to as
13 "perhaps the most important writ known to the constitutional law of England,
14 affording as it does a swift and imperative remedy in all cases of illegal restraint
15 or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963).
16

17 16. Petitioner is "in custody" for the purpose of § 2241 because Petitioner was arrested
18 and is detained by Respondents.
19

20 **PARTIES**

21 17. Petitioner is a 47-year-old citizen of Guatemala. Petitioner is present within the
22 state of California at the time of the filing of this petition.
23

24 18. Respondent Christopher LaRose ("LaRose") is the Senior Warden at Otay Mesa
25 Detention Center in San Diego, California, where Mr. Lucas-Jacinto is detained.
26 LaRose is responsible for the day-to-day operations and confinement of noncitizens
27 detained at that facility. He acts at the direction of Respondents Brightman,
28

1 Lyons, and Noem. LaRose is a custodian of Mr. Lucas-Jacinto, and is named in his
2 official capacity.

3 19. Respondent, Daniel A. Brightman, is the Field Office Director for the San Diego
4 Field Office, Immigration and Customs Enforcement and Removal Operations
5 (“ICE”). The San Diego Field Office is responsible for local custody decisions
6 relating to non-citizens charged with being removable from the United States,
7 including the arrest, detention, and custody status of noncitizens. The San Diego
8 Field Office’s area of responsibility includes San Diego and Imperial Counties in
9 California. Respondent Daniel Brightman is a legal custodian of Petitioner.
10
11

12 20. Respondent Todd Lyons is the acting director of U.S. Immigration and Customs
13 Enforcement, and he has authority over the actions of respondent Daniel
14 Brightman and ICE in general. Respondent Daniel Brightman is a legal custodian
15 of Petitioner.
16

17 21. Respondent Kristi Noem is the Secretary of the Department of Homeland Security
18 (DHS) and has authority over the actions of all other DHS Respondents in this
19 case, as well as all operations of DHS. Respondent Noem is a legal custodian of
20 Petitioner and is charged with faithfully administering the immigration laws of
21 the United States.
22

23 22. Respondent Pamela Bondi is the Attorney General of the United States, and as
24 such has authority over the Department of Justice and is charged with faithfully
25 administering the immigration laws of the United States.
26
27
28

1 23. Respondent U.S. Immigration Customs Enforcement is the federal agency
2 responsible for custody decisions relating to non-citizens charged with being
3 removable from the United States, including the arrest, detention, and custody
4 status of non-citizens.
5

6 24. Respondent U.S. Department of Homeland Security is the federal agency that has
7 authority over the actions of ICE and all other DHS Respondents.
8

9 25. This action is commenced against all Respondents in their official capacities.
10

11 LEGAL FRAMEWORK

12 26. Immigration detention should not be used as a punishment and should only be
13 used when, under an individualized determination, a noncitizen is a flight risk
14 because they are unlikely to appear for immigration court or a danger to the
15 community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).
16

17 27. Noncitizens in immigration proceedings are entitled to Due Process under the
18 Fifth Amendment of the U.S. Constitution. *Reno v. Flores*, 507 U.S. 292, 306
19 (1993).
20

21 28. The Immigration and Nationality Act (INA) sets the rules for detaining
22 noncitizens while the government decides whether they are removable. See 8
23 U.S.C. § 1226(a).
24

25 29. Custody determinations for individuals in 1229a removal proceedings are
26 governed by 8 U.S.C. § 1226. Under § 1226(a), an individual may be released if he
27 does not present a danger to persons or property and is not a flight risk. *Zadvydas*
28 *v. Davis*, 533 U.S. 678, 690 (2001); *Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006).

1 30. Custody determinations under § 1226(a) are individualized and based on the facts
2 presented in those cases. Unlike § 1226(c), which can provide for categorical
3 determinations for detention regardless of flight risk or safety risks, § 1226(a)
4 requires a case-by-case review of the facts and circumstances.
5

6 31. Once a determination to release an individual from custody is made, the release
7 order may be revisited when the facts or circumstances warrant revocation or
8 reconsideration. 8 U.S.C. § 1226(b). For an individual who was once in custody, the
9 Attorney General may take that individual back into custody by revoking the
10 individual's release when the facts and circumstances warrant it.
11

12 32. Revocation and return to custody is authorized only based on individualized facts
13 and circumstances.
14
15

16
17 **FACTUAL BACKGROUND**

18 33. Petitioner, Fidel Lucas-Jacinto, fled a fear of persecution in his home country of
19 Guatemala and entered the United States of America seeking protection as a
20 refugee under its asylum laws.
21

22 34. On or about May 15, 2018, On information and belief, based on the individualized
23 facts of Petitioner's case, the Executive Office for Immigration Review (EOIR), a
24 sub-office of the Department of Justice (DOJ), ordered the release of the Petitioner
25 from its custody on the minimum bond of \$1500 pursuant to 8 CFR 236.1(c).
26
27
28

1 35. Respondents commenced removal proceedings against Petitioner in immigration
2 court, entitling Petitioner to present an asylum claim with the due process rights
3 under 8 U.S.C. § 1229a.

4 36. While released from ICE custody on a minimum bond on May 16, 2018, he
5 remained free for over seven years. During that time, Petitioner Lucas-Jacinto
6 complied with every request, demand and requirement imposed by Respondents,
7 in addition to complying with all the court and legal timelines in pursuing
8 immigration relief.
9

10 37. ICE detained Mr. Lucas-Jacinto for no reason or basis while he was on his way to
11 work. Mr. Lucas-Jacinto has a valid work authorization.

12 38. Mr. Lucas-Jacinto is being detained without explanation.

13 39. Accordingly, to vindicate Petitioner's rights, this Court should grant the instant
14 petition for a writ of habeas corpus. Petitioner asks this Court to find that
15 Respondents' attempts to detain the Petitioner are arbitrary and capricious and in
16 violation of the law, and to immediately issue an order releasing Petitioner from
17 ICE custody.
18
19
20

21 **CLAIMS FOR RELIEF**

22 **COUNT ONE**

23 **Violation of the Administrative Procedure Act – 5 U.S.C. § 706(2)(A)**
24 **Abuse of Discretion**
25 **Violation of 8 U.S.C. § 1226(b), 8 C.F.R. § 1003.19(e)**
26

27 40. Petitioner restates and realleges all paragraphs as if fully set forth here.
28

1 41. Under the APA, a court shall “hold unlawful and set aside agency action” that is
2 an abuse of discretion. 5 U.S.C. § 706(2)(A).

3 42. An action is an abuse of discretion if the agency “entirely failed to consider an
4 important aspect of the problem, offered an explanation for its decision that runs
5 counter to the evidence before the agency, or is so implausible that it could not be
6 ascribed to a difference in view or the product of agency expertise.” *Nat’l Ass’n of*
7 *Home Builders v. Defs. of Wildlife*, 551 U.S. 644, 658 (2007) (quoting *Motor Vehicle*
8 *Mfrs. Ass’n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 43 (1983)).

9
10
11 43. To survive an APA challenge, the agency must articulate “a satisfactory
12 explanation” for its action, “including a rational connection between the facts
13 found and the choice made.” *Dep’t of Com. v. New York*, 139 S. Ct. 2551, 2569
14 (2019) (citation omitted).

15
16 44. By categorically revoking Petitioner’s release without consideration of his
17 individualized facts and circumstances, Respondents have violated the APA.

18 45. By detaining the Petitioner categorically, Respondents have further abused their
19 discretion because there have been no changes to his facts or circumstances since
20 the agency made its initial custody determinations that support the revocation of
21 his release from custody.

22
23 46. Respondents have already considered Petitioner’s facts and circumstances and
24 determined that he was not a flight risk or danger to the community. There have
25 been no changes to the facts that justify this revocation of his release on his own
26 recognizance.
27
28

1 47. The fact that Petitioner has already been granted release by Respondents under
2 the same facts and circumstances shows that Respondents do not consider him, on
3 an individualized basis, to be a danger to the community or a flight risk.

4
5 **COUNT TWO**

6 **Violation of the Administrative Procedure Act – 5 U.S.C. § 706(2)(A)**
7 **Not in Accordance with Law and in Excess of Statutory Authority**
8 **Violation of 8 U.S.C. § 1226(b), 8 C.F.R. § 1003.19(e)**

9 48. Petitioner restates and realleges all paragraphs as if fully set forth here.

10 49. Under the APA, a court “shall . . . hold unlawful . . . agency action” that is “not in
11 accordance with law;” “contrary to constitutional right;” “in excess of statutory
12 jurisdiction, authority, or limitations;” or “without observance of procedure
13 required by law.” 5 U.S.C. § 706(2)(A)-(D).

14 50. Under INA § 236(a), 8 U.S.C. § 1226(a), the Attorney General is authorized to
15 release a noncitizen from custody on bond or conditional parole pending removal
16 proceedings. Once a bond determination has been made by an Immigration Judge
17 pursuant to 8 C.F.R. § 1003.19(a), that determination constitutes an exercise of
18 the Attorney General’s delegated adjudicatory authority through EOIR. Nothing
19 in the statute or regulations authorizes DHS to unilaterally override, nullify, or
20 disregard a bond determination issued by an Immigration Judge following a bond
21 redetermination hearing. Accordingly, once EOIR has exercised its exclusive
22 jurisdiction to set bond, DHS may only seek modification of that custody
23 determination through the procedures set forth in 8 C.F.R. § 1003.19(e), rather
24 than through administrative revocation by enforcement officers. It is a well-
25
26
27
28

1 established administrative principle that “agency action taken without lawful
2 authority is at least voidable, if not void ab initio.” *L.M.-M. v. Cuccinelli*, 442 F.
3 Supp. 3d 1, 35 (D.D.C. 2020), citing *SW General, Inc. v. NLRB*, 796 F.3d 67, 79
4 (D.C. Cir. 2015); see also *Hooks v. Kitsap Tenant Support Servs., Inc.*, 816 F.3d
5 550, 555 (9th Cir. 2016) (invalidating agency action because it was taken by
6 unauthorized official).

7
8 51. On information and belief, Respondents have revoked or are revoking Petitioner’s
9 prior custody determination as a result of a categorical policy prepared by and
10 implemented by unidentified government officials in Washington, not through the
11 individual exercise of discretion required by law.

12
13 52. Because Petitioner’s revocation of release from custody has been made or will be
14 categorically directed by government officials not authorized by law to make this
15 determination, Respondents’ detention of Petitioner is not in accordance with law
16 and in excess of statutory authority.
17

18
19
20 **COUNT THREE**

21 **Violation of Fifth Amendment Right to Due Process**
22 **Procedural Due Process**

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

24 54. The Due Process Clause of the Fifth Amendment to the U.S. Constitution
25 prohibits the federal government from depriving any person of “life, liberty, or
26 property, without due process of law.” U.S. Const. Amend. V. Due process protects
27 “all ‘persons’ within the United States, including [non-citizens], whether their
28

1 presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533 U.S.
2 at 693; accord *Flores*, 507 U.S. at 306. 62. Due process requires that government
3 action be rational and non-arbitrary. See *U.S. v. Trimble*, 487 F.3d 752, 757 (9th
4 Cir. 2007).

5
6 55. While the government has discretion to detain individuals under 8 U.S.C. §1226(a)
7 and to revoke custody decisions under 8 U.S.C. § 1226(b), this discretion is not
8 “unlimited” and must comport with constitutional due process. See *Zadvydas*, 533
9 U.S. at 698.

10
11 56. Here, Respondents have chosen to revoke Petitioner’s release on bond in an
12 arbitrary manner and not based on a rational and individualized determination of
13 whether he is a safety or flight risk, in violation of due process. Because no
14 individualized custody revocation has been made and no circumstances have
15 changed to make Petitioner a flight risk or a danger to the community,
16 Respondents’ revocation of Petitioner’s release violates his right to procedural due
17 process.
18

19
20 **PRAYER FOR RELIEF**

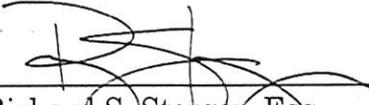
21 **WHEREFORE**, Petitioner respectfully requests this Court to grant the following:
22

- 23 1. Assume jurisdiction over this matter;
24 2. Issue an Order to Show Cause ordering Respondents to show cause why this
25 Petition should not be granted within three days;
26
27
28

- 1 3. Declare that Petitioner's detention while released on bond without an
- 2 individualized determination violates the Due Process Clause of the Fifth
- 3 Amendment;
- 4 4. Declare that Petitioner's revocation of parole from custody was made in
- 5 violation of statute and regulation;
- 6
- 7 5. Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner
- 8 from custody;
- 9
- 10 6. Award Petitioner attorney's fees and costs under the Equal Access to Justice
- 11 Act, and on any other basis justified under law; and
- 12 7. Grant any further relief this Court deems just and proper.

13
14
15 Date: 01/08/2026

STERGER LAW GROUP, P.C.

16
17 By: 
18 Richard S. Sterger, Esq.
19 Attorney for Petitioner
20 Fidel Lucas-Jacinto
21
22
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24
25
26
27
28

1 Richard S. Sterger, Esq. (SBN 335832)
2 Sterger Law Group, P.C.
3 300 W. Grand Ave., Suite 200
4 Escondido, CA 92025
5 (760) 546-2111
6 rick@stergerlawgroup.com

7 Attorney for Petitioner
8 FIDEL LUCAS-JACINTO

9 UNITED STATE DISTRICT COURT
10 SOUTHER DISTRICT OF CALIFORNIA

11 FIDEL LUCAS-JACINTO,

12 Plaintiff,

13 v.

14 CHRISTOPHER J. LAROSE, Senior
15 Warden, Otay Mesa Detention Center;
16 DANIEL A. BRIGHTMAN, San Diego
17 Field Office Director, Immigration and
18 Customs Enforcement and Removal
19 Operations ("ICE/ERO"); TODD M.
20 LYONS, Acting Director of Immigration
21 Customs Enforcement ("ICE"); U.S.
22 Immigration and Customs Enforcement;
23 KRISTI NOEM, Secretary of the
24 Department of Homeland Security
25 ("DHS"); U.S. Department of Homeland
26 Security; and PAMELA BONDI,
27 Attorney General of the United States,

28 Respondents.

CASE NO.: '26CV0111 RSH BLM

EXHIBIT LIST

EXHIBIT LIST



EXHIBIT “A”



Report

Main Menu

Search Results: 1

FIDEL LUCAS-JACINTO

Country of Birth : Guatemala

A-Number: [REDACTED]

Status : In ICE Custody

State: CA

Current Detention Facility: OTAY MESA DETENTION CENTER

** Click on the Detention Facility name to obtain facility contact information*

[BACK TO SEARCH >](#)

Related Information

Helpful Info

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[About the Detainee Locator](#)

[Brochure](#)

[ICE ERO Field Offices](#)

[ICE Detention Facilities](#)

[Privacy Notice](#)

[External Links](#)

Bureau of Prisons Inmate
Locator

of 9



DHS.govUSA.govOIGOpenFOIAMetrics No Site Site
Gov FearMapPolicies
Act &
Plug-
Ins



EXHIBIT “B”

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
SAN DIEGO, CA

FILE: 

IN THE MATTER OF:

LUCAS-JACINTO, FIDEL

RESPONDENT

IN REMOVAL PROCEEDINGS

ORDER OF THE IMMIGRATION JUDGE
WITH RESPECT TO CUSTODY

Request having been made for a change in the custody status of respondent pursuant to 8 CFR 236.1(c), and full consideration having been given to the representations of the Department of Homeland Security and the respondent, it is hereby

ORDERED that the request for a change in custody status be denied.

ORDERED that the request be granted and that respondent be:

released from custody on his own recognizance

released from custody under bond of \$ 1,500.00

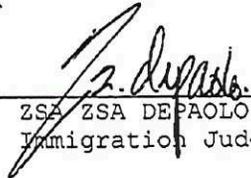
OTHER Imposition of ATO within discretion of DHS/ICE

Copy of this decision has been served on the respondent and the Department of Homeland Security.

APPEAL: waived reserved

OTAY MESA -- OTAY MESA DETENTION CENTER

Date: May 15, 2018


ZSA ZSA DEPAOLO
Immigration Judge

XS

*1030 Golden Rd.
Encinitas, CA. 92024*

760-815-2572.

Appeal to CV San Diego

SCANNED
MAY 15 2018
SND



Notice of Release and Proof of Service

To: Lucas-Jacinto, Fidel
1062 GOLDEN ROAD
ENCINITAS, CALIFORNIA 92024

Date: [Redacted]
File: [Redacted]
Bond Number: SND-C-18-00611
Amount: \$1,500.00

You have been released from service custody pending a final decision in your exclusion/deportation hearing. It is understood that you will be residing at the above address. The law requires you notify the Immigration Judge (at the address shown below) of any address correction or address change. When doing so, be sure to include your name and the File Number shown above in your written communication. The attached form, EOIR-33 can be used for this purpose.

Office of the Immigration Judge
401 West A Street, Suite 800
San Diego, CA 92101

1800-898-7180

If you have already appeared before the Immigration Judge, you have been told when to appear for a further hearing. If you have yet to appear before the Judge, a notice of hearing will soon be sent to you at the above address. If you do not appear for the hearing, three (3) actions can be taken in your case:

- 1. Your deportation hearing may be held in your absence.
2. If a bond has been paid, it may be breached.
3. A warrant for your arrest may be issued.

I certify that the address listed above, furnished by me to the Service, is correct, and that a copy of this notice has been received by me this date

WITNESS

[Handwritten initials]

Lucas-Jacinto, Fidel

05/16/2018

Signature of Respondent

Date

PROOF OF SERVICE

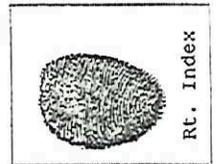
I certify that, on this date, I served the attached Form I-830 and release notice on the respondent by the following method (as checked):

- X Hand delivery.
By first class mail, postage prepaid, to the following address:

[Blank lines for address]

- Service by mail on respondent's counsel of record at the following address:

[Blank line for address]



RICHEZ/DO 05/16/2018

Signature and Title of ICE Employee Date

DRO May 22, 2002 Distribution: A-File; EOIR; Alien: Lucas-Jacinto, Fidel

Date: 05/16/2018

File No: 

To: Office of the Immigration Judge
Executive Office for Immigration Review
7488 Calzada de la Fuente
San Diego, CA 92154 PH: 619-661-5600

From: Office of the Field Director
U. S. Immigration and Customs Enforcement
880 Front Street, Room 2242
San Diego, CA 92101 PH: 619-436-0620

Respondent: Lucas-Jacinto, Fidel

This is to notify you that this respondent is:

Currently incarcerated by other than ICE. A charging document has been served on the respondent, and an Immigration Detainer-Notice of Action by the ICE (Form I-247) has been filed with the institution shown below. He/she is incarcerated at:

His/her anticipated release date is: _____

Currently detained by ICE at: _____

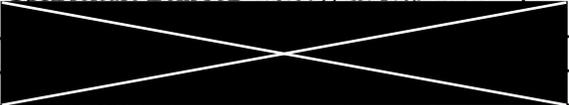
Currently detained by ICE and transferred this date to a new location: _____

ICE Motion for Change of Venue attached. Yes NO

Released from ICE custody on the following condition(s):

- Personal Recognizance
- Order of Recognizance (Form I-240A)
- Bond in the amount of \$ 1,500.00 Surety bond Cash bond
- Other _____

Upon release from ICE custody, the respondent reported his/her address and telephone number will be:



Upon release from ICE custody, the respondent was reminded of the requirements contained in Section 239 (a)(1)(F)(ii) of the Immigration and Nationality Act and was provided with an EOIR change of address form (EOIR-33).



Signature ICE Officer

RFCHIEZ/DO

Printed Name of ICE Officer

Deportation Officer

Title-ICE Officer

San Diego, CA

Location

PETITIONER'S EXHIBIT LIST

(In Support of Petition for Writ of Habeas Corpus Under 28 U.S.C. § 2241)

Exhibit A — ICE Detainee Locator

Exhibit B — Order of Release

CERTIFICATE OF SERVICE

I certify that on December 22, 2025, a true and correct copy of the foregoing
Petitioner's Exhibit List was served on Respondents or Respondents' counsel via:

- CM/ECF
- U.S. Mail
- Other: _____

/s/ Richard S. Sterger, Esq.

January 8, 2026

Richard S. Sterger, Esq.
Sterger Law Group
300 West Grand Avenue, Suite 200
Escondido, CA 92025
Phone: 760-200-7900
Email: rick@stergerlawgroup.com