UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

Reyna Munoz Rodriguez Petitioner, v. Kristi Noem Secretary, U.S. Department of Homeland Security Todd Lyons, Acting Director, U.S. Immigration and Customs Enforcement (ICE) Bret A. Bradford, ICE Houston Field Office Director Pamela Bondi, U.S. Attorney General Martin Frink, Warden Houston Processing Center Respondents.	Cause No. 4:26-cv-00184

PETITION FOR WRIT OF HABEAS CORPUS PURSUANT
TO 28 U.S.C. § 2241 AND
COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

1. Petitioner, Reyna Munoz Rodriguez, through counsel, seeks a writ of *habeas corpus* under 28 U.S.C. § 2241, challenging the legality of her continued detention by Immigration and Customs Enforcement ("ICE").
2. Petitioner is in the physical custody of Respondents at Houston Processing Center in Houston, Texas. She now faces unlawful detention because the Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have concluded Petitioner is subject to mandatory detention.
3. Petitioner is charged with, *inter alia*, having entered the United States without admission or inspection. *See 8 U.S.C. §§ 1182(a)(6)(A)(i). Ex 3 NTA #2.*
4. Consistent with a new DHS policy issued on July 8, 2025, this policy instructs all Immigration and Customs Enforcement (ICE) employees to consider anyone inadmissible under *8 U.S.C. § 1182(a)(6)(A)(i)* to wit., those who entered the United States without admission or inspection. Under this policy the Petitioner is therefore subject to detention under *8 U.S.C. § 1225(b)(2)(A)* and therefore ineligible to be released on bond.
5. Similarly, on September 5, 2025, the Board of Immigration Appeals (BIA or Board) issued a precedent decision, binding on all immigration judges,

holding that an immigration judge has no authority to consider bond requests for any person who entered the United States without admission. *See Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). The Board determined that such individuals are subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

6. Petitioner's detention on this basis violates the plain language of the Immigration and Nationality Act. Section 1225(b)(2)(A) does not apply to individuals like Petitioner who previously entered and are now residing in the United States. Instead, such individuals are subject to a different statute, § 1226(a), that allows for release on conditional parole or bond.
7. That statute expressly applies to people who, like Petitioner, are charged as being inadmissible for having entered the United States without inspection.
8. Respondents' new legal interpretation is plainly contrary to the statutory framework and contrary to decades of agency practice applying § 1226(a) to people like Petitioner.
9. Accordingly, Petitioner seeks a writ of *habeas corpus* requiring that she be released unless Respondents provide a bond hearing under § 1226(a) within seven days.

PARTIES

10. Petitioner, Reyna Munoz Rodriguez, is a non-citizen who is currently detained by ICE at the Houston Processing Center in Houston, Texas.

11. Respondent Kristi Noem is the Secretary of the Department of Homeland Security ("DHS"). She is the cabinet-level secretary responsible for all immigration enforcement in the United States. She is sued in his official capacity only.

12. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement ("ICE"). He is the head of the federal agency responsible for all immigration enforcement in the United States. He is sued in his official capacity only.

13. Respondent Bret A. Bradford is the ICE Houston Field Office Director. He is the head of the ICE office that is unlawfully facilitating the continued detention of Petitioner. He is sued in his official capacity only.

14. Respondent, Pamela Bondi is the Attorney General of the United States. The Immigration Judges who decide removal cases and application for relief from removal do so as her designees. She is sued in her official capacity only.

15. Respondent, Martin Fink is the Warden of the Houston Processing Center. He is the head of the facility that currently maintains physical custody of the Petitioner. He is sued in his official capacity only.

JURISDICTION

16. This Court has jurisdiction to hear this case under *28 U.S.C. § 2241* and *28 U.S.C. § 1331*, Federal Question Jurisdiction as Petitioner is presently in custody under color of authority of the United States and such custody is in violation of the U.S. Constitution, laws, or treaties of the United States. This Court may grant relief pursuant to *28 U.S.C. § 2241*, and the *All Writs Act, 28 U.S.C. § 1651.*

CUSTODY

17. Petitioner is under the Physical custody of the Respondents and is currently detained at the Houston Processing Center in Houston, Texas.

VENUE

18. Venue is proper in this court, pursuant to *28 USC §1391(e),* in that this is an action against officers and agencies of the United States in their official capacities, brought in the District where the Petitioner is detained. *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493- 500 (1973)

REQUIREMENTS SET FORTH IN 28 U.S.C 2243

19. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents "forthwith," unless the petitioner is not entitled to relief. *28 U.S.C. § 2243*. If an order to show

cause is issued, the Court must require respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added).

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

LEGAL FRAMEWORK

i. Immigration Bond Process

21. The INA prescribes three basic forms of detention for the vast majority of noncitizens in removal proceedings.

22. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal proceedings before an IJ. See 8 U.S.C. § 1229(a). Individuals in § 1226(a) detention are generally entitled to a bond hearing at the outset of their detention, see 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention, see 8 U.S.C. § 1226(c).

23. Second, the INA provides for mandatory detention of noncitizens subject to expedited removal under 8 U.S.C. § 1225(b)(1) and for other

recent arrivals seeking admission referred to under § 1225(b)(2).

24. Last, the INA also provides for detention of noncitizens who have been ordered removed, including individuals in withholding-only proceedings, see 8 U.S.C. § 1231(a)–(b).

25. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

26. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No. 104-–208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585. Section 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-1, 139 Stat. 3 (2025).

27. Following the enactment of the IIRIRA, EOIR drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225 and that they were instead detained under § 1226(a). *See* Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

28. Thus, in the decades that followed, most people who entered without inspection and were placed in standard removal proceedings received

bond hearings, unless their criminal history rendered them ineligible pursuant to 8 U.S.C. § 1226(c). That practice was consistent with many more decades of prior practice, in which noncitizens who were not deemed "arriving" were entitled to a custody hearing before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply "restates" the detention authority previously found at § 1252(a)).

29. On May 15, 2025, the BIA held in *Matter of Q Li*, 29 I&N Dec. 66 (BIA 2025) that an applicant for admission arrested *without* a warrant, while arriving in the U.S. was detained under 1225(b) and ineligible for release on bond under 1226(a).

30. On July 8, 2025, ICE, "in coordination with" DOJ, announced a new policy that rejected well-established understanding of the statutory framework and reversed decades of practice.

31. The new policy, entitled "Interim Guidance Regarding Detention Authority for Applicants for Admission," claims that all persons who entered the United States without inspection shall now be subject to mandatory detention provision under § 1225(b)(2)(A). The policy applies regardless of when a person is apprehended and affects those who have resided in the United States for months, years, and even decades.

32. On September 5, 2025, the BIA adopted the same position in a published decision, *Matter of Yajure Hurtado*. There, the Board held that all noncitizens who entered the United States without admission or parole are subject to detention under § 1225(b)(2)(A) and are ineligible for IJ bond hearings.

33. Since Respondents adopted their new policies, dozens of federal courts have rejected their new interpretation of the INA's detention authority. Courts have likewise rejected *Matter of Yajure Hurtado*, which adopts the same reading of the statute as ICE.

34. Even before ICE or the BIA in *Yajure Hurtado* introduced these nationwide policies, IJs in the Tacoma, Washington, immigration court improperly stopped providing bond hearings for persons who entered the United States without inspection and who have since resided here. Reviewing the EOIR interpretation, the U.S. District Court in the Western District of Washington found that such a reading of the INA is likely unlawful and that § 1226(a), not § 1225(b), applies to noncitizens who are not apprehended upon arrival to the *United States. Rodriguez Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025).

35. Subsequently, hundreds of courts across the country adopted the same reading of the INA's detention authorities and rejected ICE and EOIR's new interpretation. See, e.g., *Gomes v. Hyde*, No. 1:25-CV-11571-JEK,

2025 WL 1869299 (D. Mass. July 7, 2025); *Diaz Martinez v. Hyde*, No. CV 25-11613-BEM,--- F. Supp. 3d , 2025 WL 2084238 (D. Mass. July 24, 2025); *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), report and recommendation adopted, No. CV-25- 02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025); *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142- SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-cv-01789-ODW (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF, 2025 WL 2419263 (N.D. Cal. Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428- JRR, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051 (ECT/DJF), --- F. Supp. 3d, 2025 WL 2466670 (D. Minn. Aug. 27, 2025) *Lopez-Campos v. Raycraft*, No. 2:25-cv-12486-BRM-EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Vasquez Garcia v. Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Zaragoza Mosqueda v.*

Noem, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass. Sept. 9, 2025); see also, e.g., *Palma Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566, at *2 (D. Neb. Sept. 3,2025) (noting that "[t]he Court tends to agree" that § 1226(a) and not § 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-cv-03161- JFB-RCC, 2025 WL 2402271 at *3 (D. Neb. Aug. 19, 2025) (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-RCC, 2025 WL 2374224 at*2 (D. Neb. Aug. 14, 2025) (same).

36. Courts in this district have also found that Section 1226(a) applies to Petitioners in similar positions and the petitioners were not subject to mandatory detention under 1225(b). *See Rivera-Henriquez v. Tate, 4:25-CV-045436, (S.D. Tex. Sep. 26, 2025); Buenrostro Mendez v. Bondi, 4:25-cv-03726 (S.D. Tex. Oct. 7, 2025); Covarrubias v. Vergara*, 5:25-cv-112 (S.D. Tex. Oct. 8, 2025); *Platas Arcos v. Noem, 4:25-cv-04599 (S.D. Tex. Oct. 8, 2025); Ortega-Aguirre v. Noem, 4:25-cv-04332 (S.D. Tex. Oct. 10, 2025); Baltazar v. Vasquez*, 25-cv-175 (S.D. Tex. Oct. 14, 2025); *Ortiz v. Bondi*, 5:25-cv-132 (S.D. Tex. Oct. 15, 2025); *Fuentes v. Lyons et al.*, 5:25-cv-00153 (S.D. Tex. Oct. 16, 2025); *Ascencio-Merino v. Dickey*, 4:25-cv-00490 (S.D. Tex. Oct. 21, 2025); *Aslamov v Warden*

Bryan Uhls, 4:25-cv-04299 (S.D. Tex. Oct. 22, 2025); *Mejia Juarez v. Bondi, 4:25-cv-03937, (S.D. Tex. Oct. 27, 2025); De La Caridad Mendez Velazquez v. Noem et al.,* 4:25-cv-04527 (S.D. Tex. Oct. 30, 2025), *Torres-Rodriguez v Noem et al.,* 4:25-cv-05036 (S.D. Tex. Nov. 3, 2025); *Lopez-Tipaz v Noem et al*., 4:25-cv-04905 (S.D. Tex. Nov. 25, 2025); *Reyes-Lopez v. Noem et al*., 4:25-cv-04629 (S.D. Tex. Nov. 21, 2025); *Moreno Rangel v. Noem et al.*, 4:25-cv-05270 (S.D. Tex. Nov. 24, 2025); *Gutierrez-Fonseca v Warden of MPC*, 4:25-05229 (S.D. Tex. Nov. 25, 2025); *Espinoza-Andres v. Noem, et al*, 4:25-cv-05128, (S.D. Tex. Dec. 2, 2025).

37. Courts have uniformly rejected DHS' and EOIR's new interpretation because it patently defies the INA. As the *Rodriguez Vazquez* court and others have explained, the plain text of the statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to people like Petitioner.

38. The U.S. District Court for the Central District of California issued an order in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3288403, at *9 (C.D. Cal. Nov. 25, 2025) certifying a nationwide class of noncitizens who are in immigration detention and being denied access to a bond hearing based

on the government's allegation that they entered the United States without admission or inspection. Despite the final judgment in this class action lawsuit, immigration courts are still not conducting bond hearings unless a Petitioner has their own decision pursuant to a writ of Habeas Corpus.

39. Section 1226(a) applies by default to all persons "pending a decision on whether the [noncitizen] is to be from the United States." These removal hearings are held under § 1229(a), to "decid[e] the inadmissibility or deportability of a [noncitizen]." These pending decisions include matters on appeal to the Board of Immigration Appeals, as the matter is not final.

40. The text of § 1226 also explicitly applies to people charged as being inadmissible, including those who entered without inspection. *See* 8 U.S.C. § 1226(c)(1)(E). Subparagraph (E)'s reference to such people makes clear that, by default, such people are afforded a bond hearing under subsection (a). As the *Rodriguez Vazquez* court explained, "[w]hen Congress creates 'specific exceptions' to a statute's applicability, it 'proves' that absent those exceptions, the statute generally applies." *Rodriguez Vazquez*, 779 F. Supp. 3d at 1257 *(citing Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)); *see also Gomes*, 2025 WL 1869299, at *7.

41. Section 1226 therefore leaves no doubt that it applies to people who face charges of being inadmissible to the United States, including those who are present without admission or parole.

42. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently entered the United States. The statute's entire framework is premised on inspections at the border of people who are "seeking admission" to the United States. 8 U.S.C.§ 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory detention scheme applies "at the Nation's borders and ports of entry, where the Government must determine whether a [noncitizen] seeking to enter the country is admissible." *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018).

43. However, individuals arrested pursuant to warrant for arrest are processed under 1226(a), and not 1225(b), like the Petitioner in this case.

44. Petitioner cannot fall under the 1225(b), for two reasons.

45. First, under 8 U.S.C. § 1225(b)(2)(A), an alien can only be detained ***until*** his or her removal proceedings have ***concluded***. In this case, Petitioner's (first) removal proceedings, initiated after her unlawful entry into the United States, concluded when the case was dismissed. Immediately after the conclusion of her (first) proceedings, she became no longer subject to the mandatory detention provision under 1225(b)(2)(A); she must

therefore fall under 1226(a) and be eligible for bond in these second removal proceedings.

46. Second, Petitioner cannot be said that she was "seeking admission" into the United States at the time of her apprehension and detention in December of 2025.

47. By the time that Petitioner was detained by ICE, on or about December of 2025, she was an alien *already present* in the United States for a period of approximately seven years, and she was not apprehended near a border or paroled at the border at the time of her current arrest, apprehension, and detention. *See also Jennings v. Rodriguez*, 583 U.S. 281, 303 (2018) (stating that 8 U.S.C. § 1225(b) "applies to aliens *seeking entry into the United States*…" while 8 U.S.C. § 1226(a) "applies to aliens *already present* in the United States"); *Matter of Q. Li*, 29 I&N Dec. 66, 70 (BIA 2025) (noting that 8 U.S.C. § 1226(a) "applies to aliens *already present* in the United States"). Accordingly, and contrary to the Respondents' assertions, Petitioner was not (and is not) an alien "seeking admission," and therefore, he cannot be subject to the mandatory detention provisions of 8 U.S.C. § 1225(b)(2) under a plain reading of the statute.

48. Because Petitioner does not fall under 8 U.S.C. § 1225(b)(2)(A), and no other grounds of mandatory detention apply in this case, she must fall under 8 U.S.C. § 1226(a). He should therefore be eligible for release on

bond with an IJ

49. Accordingly, the mandatory detention provision of § 1225(b)(2)(A) does not apply to people like Petitioner. Section 1225(b)(2) only applies until the conclusion of proceedings. In this case, the Petitioner's proceedings were concluded when the government failed to prosecute that initial case.

FACTS

50. Petitioner entered the United States without inspection from El Salvador in 2018. Petitioner was apprehended and released under her own recognizance under 1226. *Ex 1 Form I-286 Notice of Custody Determination.* A notice to appear was issued at that time, but the case was dismissed by DHS, so these proceedings were concluded. *Ex 2 NTA #1.*

51. Petitioner filed an asylum application with USCIS; however, that case was referred to the Immigration Court and she was issued a second NTA in 2020. *Ex 3 NTA #2.*

52. Petitioner was the victim of trafficking and filed an application for T nonimmigrant status, which is still pending with USCIS since 2024. *Ex 4 T Visa Receipt.*

53. Petitioner was placed into ICE custody in November of 2025 pursuant to a

traffic stop in Houston, TX. Petitioner is currently detained at the Houston Processing Center.

54. Petitioner is charged with inadmissibility for being 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. *Ex 3 NTA #2*. Petitioner was not charged as an arriving alien. *Id.*

55. Per *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025) and *Matter of Q Li*, 29 I&N Dec. 66 (BIA 2025) an IJ is unable to consider a bond for the Petitioner. Any bond application at this point would be deemed futile as IJ's are bound by *Yarjure Hurtado* and *Q Li.*

56. The Petitioner currently remains in detention with his removal proceedings continuing in custody. Without relief from this Court the Petitioner will remain in custody for months or even years while his case is processed.

CAUSE OF ACTION I
Unlawful Detention in Violation of 8 U.S.C. § 1226 and INA

57. Petitioner incorporates by reference paragraphs 1 – 56.

58. The mandatory detention provision at *8 U.S.C. § 1225(b)(2)* does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. As relevant here, it does not apply to those who previously entered the country and have been residing in the United

States prior to being apprehended and placed in removal proceedings by Respondents. Such noncitizens are detained under § 1226(a), unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.

59. The application of § 1225(b)(2) to Petitioner unlawfully mandates her continued detention and violates the INA.

60. Respondents previously processed this Petitioner under 1226(a) given that he was arrested initially under a warrant for arrest under 1226(a), and released on her recognizance under 1226(a)(2)(B).

CAUSE OF ACTION II
Violation of Bond Statute

61. Petitioner incorporates by reference paragraphs 1 – 56.

62. In 1997, after Congress amended the INA through IIRIRA, EOIR and the then-Immigration and Naturalization Service issued an interim rule to interpret and apply IIRIRA. Specifically, under the heading of "Apprehension, Custody, and Detention of [Noncitizens]," the agencies explained that "[d]espite being applicants for admission, [noncitizens] who are present without having been admitted or paroled (formerly referred to as [noncitizens] who entered without inspection) will be eligible for bond and bond redetermination." *62 Fed. Reg. at 10323* (emphasis added). The agencies thus made clear that individuals who had entered without inspection were eligible for consideration for bond and

bond hearings before IJs under 8 U.S.C. § 1226 and its implementing regulations.

63. Nonetheless, pursuant to *Matter of Yajure Hurtado*, EOIR has a policy and practice of applying § 1225(b)(2) to individual like Petitioner.

64. The application of § 1225 (b)(2) to Petitioner unlawfully mandates her continued detention and violates 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

CAUSE OF ACTION III
Due Process
U.S. Constitution, 5th Amendment

65. Petitioner incorporates by reference paragraphs 1 – 56.

66. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

67. Petitioner has a fundamental interest in liberty and being free from official restraint.

68. The government's detention of Petitioner without a bond redetermination hearing to determine whether she is a flight risk or danger to others violates her right to due process.

REQUEST FOR RELIEF

Petitioner prays for judgment against Respondents and respectfully request that

the Court enters an order:

1. Assume jurisdiction over this matter;
2. Order that Petitioner shall not be transferred outside the Southern District of Texas while this habeas petition is pending;
3. Issue a writ of habeas corpus directing Respondent to immediately release Petitioner from detention or, in the alternative, provide Petitioner with a bond hearing pursuant to 8 U.S.C. § 1226(a) within seven days;
4. Declare that Petitioner's continued detention violates federal law and the Constitution;
5. Award reasonable attorney's fees and costs under the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412; and
6. Grant any other relief the Court deems just and proper.

Respectfully submitted,

/s/ Carlos Dominguez Gonzalez
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VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Reyna Munoz Rodriguez, and submit this verification on her behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 9th day of January, 2026.

/s/ Carlos Dominguez Gonzalez
Carlos Dominguez Gonzalez, Esq.