

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA**

Oscar Ovidio Tot-Choc,

Petitioner,

v.

Pamela Bondi, Attorney General,

Kristi Noem, Secretary, U.S. Department
of Homeland Security,

Todd M. Lyons, Acting Director of
Immigration and Customs Enforcement,
and

David Easterwood, Acting Director, St.
Paul Field Office Immigration and
Customs Enforcement.

Respondents.

Case No. 26-CV-167

**VERIFIED PETITION
FOR WRIT OF
HABEAS CORPUS**

Expedited Handling Requested

INTRODUCTION

1. Petitioner, Mr. Oscar Ovidio Tot-Choc (“Mr. Tot-Choc”), by and through the undersigned attorney, hereby files this petition for a writ of habeas corpus and a complaint for declaratory and injunctive relief to require U.S. Immigration and Customs Enforcement (“ICE”) to release Mr. Tot-Choc from ICE detention, or in the alternative to enjoin their transfer to a facility outside of Minnesota and to provide him with a bond hearing pending the completion of his immigration proceedings.

JURISDICTION AND VENUE

2. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 1361 (federal employee mandamus action); 28 U.S.C. § 1651 (All Writs Act); 28 U.S.C. § 2241 (habeas corpus); Art. I, § 9, c. 2 of the U.S. Constitution (“Suspension Clause”); 5 U.S.C. § 702 (waiver of sovereign immunity); and 28 U.S.C. § 2201 (Declaratory Judgment Act).

3. Federal question jurisdiction exists because Mr. Tot-Choc seeks to challenge his custody as a violation of the Constitution and the Immigration and Nationality Act, 8 U.S.C. § 1101 et seq.

4. Federal district courts have jurisdiction under 28 U.S.C. § 2241 to hear habeas petitions by noncitizens challenging the lawfulness or constitutionality of their detention by the Department of Homeland Security (“DHS”). *Denmore v. Kim*, 538 U.S. 510 516-17 (2003); *Jennings v. Rodriguez*, 138 S. Ct. 830, 839-41 (2018); and *Nielsen v. Preap*, 139 S. Ct. 954, 961-63 (2019).

5. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b), (e)(1)(B), and 2241(d) because Mr. Tot-Choc is detained within the District of Minnesota.

6. Venue is also proper in this Court pursuant to 28 U.S.C. § 1391(e)(1)(A), because Respondents are operating in this district.

PARTIES

7. Petitioner is a citizen of Guatemala and a resident of West St. Paul, Dakota County, Minnesota, who is currently being held at the immigration detention facility

on 1 Federal Drive, Fort Snelling, Minnesota 55111. Petitioner is under the direct control of the respondents and has no scheduled release date.

8. Respondent Pamela Bondi is being sued in her official capacity as the Attorney General of the United States and the head of the Department of Justice. Attorney General Bondi shares responsibility for implementation and enforcement of the immigration detention statutes, along with Respondent Noem. Attorney General Bondi is a legal custodian of Mr. Tot-Choc.

9. Respondent Kristi Noem is being sued in her official capacity as the Secretary of the Department of Homeland Security. In this capacity, Secretary Noem is responsible for the administration of the immigration laws pursuant to 8 U.S.C. § 1103(a), routinely transacts business in the District of Minnesota, supervises the Fort Snelling ICE Field Office, and is legally responsible for pursuing Mr. Tot-Choc's detention and removal. As such, Respondent Noem is a legal custodian of Mr. Tot-Choc.

10. Respondent Todd M. Lyons is the Acting Director of U.S. Immigration and Customs Enforcement and is sued in his official capacity. Defendant Lyons is responsible for Petitioner's detention.

11. Respondent David Easterwood is being sued in his official capacity as the Acting Field Office Director for the Fort Snelling Field Office for ICE within DHS. In that capacity, Field Director Easterwood has supervisory authority over the ICE agents responsible for detaining Mr. Tot-Choc. The address for the Fort Snelling Field Office is 1 Federal Drive, Fort Snelling, Minnesota 55111.

FACTUAL ALLEGATIONS AND PROCEDURAL HISTORY

12. Petitioner is a resident of West St. Paul and a citizen of Guatemala. He has lived in the United States continuously since January of 2021, when he entered without inspection.

13. He was placed in the custody of the Office of Refugee Resettlement and deemed an Unaccompanied Alien child in January 2021. He was later released to his father and Guardian in Minnesota. Respondent has a TVPRA Asylum application pending whose sole jurisdiction lies with USCIS, as well as a pending Special Immigrant Juvenile Status application with USCIS. Both applications were timely filed.

14. The Department of Homeland Security approved employment authorization for Mr. Tot-Choc in November 2025. He was detained while at work.

15. Mr. Tot-Choc lives with his brother and father in West Saint Paul Minnesota. He has a large and beloved extended family and mentors that he met while at school in Minnesota.

16. Mr. Tot-Choc has many friends and people who help guide him, for example, his teacher from school would remind him of his legal appointments and drive him to Minneapolis before he was able to drive on his own.

17. Mr. Tot-Choc recently became eligible to work and was very excited about the prospect of helping himself and his family. He also has a spotless criminal record.

18. Mr. Tot-Choc retained an immigration attorney through the Advocates for Human Rights, Kimberly Boche, who has been consulting with the undersigned

federal attorney on this case. Attorney Boche represents that Mr. Tot-Choc has been a responsive client, stays in touch with his attorney, attends all required legal proceedings, and poses no danger to the community.

19. Petitioner's immigration attorney has not been able to speak to Mr. Tot-Choc since his detention, and was called by his brother, who informed Counsel that he believed ICE took petitioner and his father while he was at work.

20. Respondents took Petitioner Tot-Choc into custody on or about January 10, 2026 and is believed to currently be at the Fort Snelling immigration building on 1 Federal Drive, St Paul, Minnesota.

21. This arrest is part of an operation in Hennepin and Ramsey counties called "Operation Metro Surge." This operation has involved hundreds of masked, unidentified individuals in unmarked vehicles (many with illegally covered or mismatched license plates) holding themselves out as ICE agents but largely refusing to identify themselves by name or to present warrants, physically assaulting pedestrians, pepper spraying and arresting citizen observers, hitting passersby with vehicles, and generally attempting to take as many immigrants as possible into custody regardless of the constitutionality of their actions. *See, e.g., Compl., Tincher et. al. v. Noem*, No. 0:25-cv-04669. (D. Minn. 12/17/2025).

22. Since the operation began on December 1, 2025, the number of immigration officials in the twin city metro area has increased fourfold, and with them these new agents have brought a similarly massive increase in unconstitutional, unlawful, and downright violent behavior towards citizens and non-citizens alike. The

people of Minnesota—of all races, nationalities, and citizenship status—are united in their shock and fear at the events of the past six weeks, and are begging for the attacks on their community to stop.

23. Given the massive volume of perceived non-citizens being taken off the streets, Respondents are running out of physical space to continue detaining people. Detainees are being held in cramped quarters at the federal building, before being quickly sent to remote locations across Minnesota or to facilities as far away as El Paso, Texas.

24. In Mr. Tot-Choc's case, he is being held at 1 Federal Drive although transfer may be imminent. Respondents maintain that Petitioner is subject to mandatory detention under 8 U.S.C. § 1225(b)(2) and are denying him the opportunity to seek a bond redetermination.

25. Mr. Tot-Choc poses no risk to society and has strong connections to his community in Dakota County, including family, friends, and educators.

26. Detaining Mr. Tot-Choc is an expensive and pointless endeavor. Mr. Tot-Choc respectfully seeks the opportunity to return to his home in West St. Paul and to continue following the legal processes set up by Congress and DHS for immigrants to seek status in this country.

27. Pending the adjudication of his Petition, Mr. Tot-Choc further seeks an order restraining the Respondents from transferring him to a location outside of the State of Minnesota, so that he may remain within the jurisdiction of this Court and accessible to his legal counsel and family support networks.

STANDARD OF LAW

28. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The “Great Writ” has been referred to by US Courts 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). A petitioner may seek a writ of habeas corpus when their custody violates the US Constitution or a federal law. 28 U.S.C. § 22441(c)(3), which should be granted if the petitioner meets their burden of proof—a preponderance of evidence. *Aditya W. H. v. Trump*, 782 F. Supp. 3d 691, 703 (D. Minn. 2025).

29. The Court must grant a petition for writ of habeas corpus or issue an order to show cause 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.*

30. Detained immigrants petitioning under 28 U.S.C. § 2241 face no statutory exhaustion requirements. *Jose J.O.E. v. Bondi*, 797 F. Supp. 3d 957, 965 (D. Minn. 2025). Nor is a judicially imposed prudential exhaustion requirement appropriate where, as here: time is of the essence, facts are largely undisputed, and the parties’ disagreement is based on a legal conclusion. *Id.* at 967-68.

31. Other courts in the Eighth Circuit have similarly declined to require prudential exhaustion when evaluating a detained immigrant’s habeas corpus petition

under similar circumstances—to address a question of statutory interpretation that does not require developing a factual record, and where the agency is demonstrably unlikely to reverse its course. *Giron Reyes v. Lyons*, 2025 WL 2712427 at *3 (N.D. Iowa Sept. 23, 2025).

32. “[T]he Due Process Clause applies to all ‘persons’ within the United States, including [immigrants], whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001).

33. Respondents have been attempting for the past several months to completely alter the previously well-settled interpretation of 8 U.S.C. § 1225(b)(2), claiming that all of a sudden this statute construes individuals who have been residing within the United States for more than two years to be “seeking admission” and are “applicants for admission,” simply because they may have pending claims for asylum, or other forms of status, or may be defending against removal proceedings. However, this Court and the majority around the country have made clear that 8 U.S.C. § 1225(b)(2) only authorizes detention for noncitizens who are at the border seeking physical entry at the time of detention, not those who have lived within the United States for more than two years, and whose detention is discretionary and governed by 8 U.S.C. § 1226. *Eliseo A.A. v. Olson*, Civ. No. 25-3381 (JWB/DJF), 2025 WL 2886729 (D. Minn. Oct. 8, 2025); *Mayamu K. v. Bondi*, Civ. No. 25-3035 (JWB/LIB), 2025 WL 3641819 (D. Minn. Oct. 20, 2025); *Khalid B.Q. v. Bondi*, Civ. No. 25-4584 (JWB/DJF), Doc. No. 10 (D. Minn. Dec. 18, 2025); *Xuseen A. v. Bondi*, Civ. No.

25-4514 (JWB/DJF), Doc. No. 16 (D. Minn. Dec. 19, 2025); *Vedat C. v. Bondi*, Civ. No. 25-4642 (JWB/DJF), Doc. No. 9 (D. Minn. Dec. 19, 2025).

34. Only under certain circumstances are immigrants subject to ongoing detention without a bond hearing. *See, e.g.*, 8 U.S.C. § 1226(c) (individuals with certain criminal convictions may be detained without a bond hearing for the pendency of removal proceedings¹) and 8 U.S.C. § 1225(b)(2) (authorizing mandatory detention of immigrants seeking admission from outside the United States, who are “not clearly and beyond a doubt entitled to be admitted.”).

35. Otherwise, the “default rule” is that 8 U.S.C. § 1226(a) and its implementing regulations apply to immigrants “already present in the United States” and subject to pending removal proceedings. *Jennings v. Rodriguez*, 583 U.S. 281, 303 (2018). Under this default rule, detained immigrants are constitutionally entitled to a bond hearing. *R.E. v. Bondi*, No. 25-CV-3946 (NEB/DLM), 2025 WL 3146312 (D. Minn. Nov. 4, 2025). *See also Mayamu K. v. Bondi*, No. 25-3035 (JWB/LIB), 2025 U.S. Dist. LEXIS 260661 (D. Minn. Oct. 20, 2025) (holding that an immigrant detained after entry while in asylum proceedings is held pursuant to 8 U.S.C. § 1226(a), and that the recent DHS policy attempting to reclassify interior arrests under 8 U.S.C. § 1225 so as to hold asylum seekers without a bond hearing is unlawful and unconstitutional.).

¹ Even when detained under 1226(c), immigrants retain due process rights and are entitled to a hearing if the period of detention becomes unreasonable. *See, e.g., Pedro O v. Garland*, 543 F.Supp.3d 733 (D. Minn. 2021) (finding a year-long mandatory detention pursuant to 8 U.S.C. § 1226(c) without an individualized hearing to violate an immigrant’s due process rights).

36. Here, Mr. Tot-Choc was already taken into the custody of the Office of Refugee Resettlement in 2021 as an unaccompanied alien child. The Office of Refugee Resettlement released him to his Guardian, determining at that time that there was no legitimate purpose to keep him detained. *See* Exhibit A, Office of Refugee Resettlement Verification of Release, May 27, 2021). 8 U.S.C. § 1225(b)(2) provides no legal basis for detaining Mr. Tot-Choc. With no change in circumstances since his original release from custody, there is neither a legal basis nor any conceivable purpose for continuing to detain him.

CLAIMS FOR RELIEF

COUNT ONE

Fifth Amendment Due Process

Petitioner is being deprived of an adequate and meaningful process to challenge his ongoing confinement.

37. Petitioner realleges and incorporates by reference the allegations contained above.

38. Mr. Tot-Choc has due process rights as a resident of the United States. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001).

39. Federal courts use the three-part test in *Mathews v. Eldridge* to determine whether civil detention violates a detainee's due process rights. 424 U.S. 319 (1976). The elements of this test are: (1) the private interest that the official action affects; (2) the risk that the procedures used will result in an erroneous deprivation of the private interest, and the probable value, if any, of additional or substitute procedural safeguards; and (3) the Government's interest in following the existing procedures,

both in achieving their objectives and in the potential burdens of an alternate procedure. *Id.* at 335.

40. Here, all three factors favor the petitioner.

41. First, he has a significant private interest at stake. A person's interest in freedom from physical detention is “the most elemental of liberty interests.” *Hamdi v. Rumsfeld*, 542 U.S. 507, 529, 124 S.Ct. 2633, 159 L.Ed.2d 578 (2004); see also *Zadvydas*, 533 U.S. at 690, 121 S.Ct. 2491 (“Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects.”). Mr. Tot-Choc currently experiences the gambit of deprivations that come with physical detention, including separation from his family and his community, an inability to work, and inhibitions to participate fully in his pending immigration proceedings.

42. Second, Mr. Tot-Choc will continue to be deprived of this interest if the current procedure (detaining Mr. Tot-Choc without a valid legal basis) is followed. With his lack of criminal record and his demonstrated pattern of following instructions and appearing for court proceedings, there is no rational explanation for detaining Mr. Tot-Choc. Even if he were detained properly under 8 U.S.C. § 1226(a), he has a strong likelihood of meeting the criteria for being released on bond. 8 CFR §§236.1(c)(8), 1236.1(c)(8) (2020); *In re Adeniji*, 22 I. & N. Dec. 1102, 1113 (BIA 1999).

43. Lastly, the Government has no legitimate interest in refusing to follow its own rules. Mr. Tot-Choc poses no safety threats to the community. Releasing Mr.

Tot-Choc, or at a minimum holding a hearing to release him on bond, would in fact *save* the government the resources and expense of continuing to imprison him.

44. The placement of Mr. Tot-Choc in detention pending the resolution of his TVPRA application, notwithstanding his prior custody determination and release from the Office of Refugee Resettlement, violates his constitutional rights to due process guaranteed in the Fifth Amendment.

COUNT TWO

Immigration and Nationality Act, 8 U.S.C. § 1226

Petitioner's Ongoing Detention, without the Opportunity for a Bond Hearing, Violates his Statutory Right to a Hearing as Guaranteed by 8 U.S.C. § 1226

45. Petitioner realleges and incorporates by reference each and every allegation contained above.

46. Respondents violate the Immigration and Nationality Act by attempting to apply mandatory detention through 8 U.S.C. § 1225(b)(2), to Petitioner.

47. Mr. Tot-Choc is detained, notwithstanding his continuous presence in the United States for more than the last two years, his prior release from custody from the Office of Refugee Resettlement, and his lack of criminal record or any indicia of danger or flight.

COUNT THREE

Violation of the Administrative Procedure Act

48. Mr. Tot-Choc re-alleges and incorporates by reference each allegation contained in the preceding paragraphs as if set forth fully herein.

49. The APA provides that a “reviewing court shall . . . hold unlawful and set aside agency action, findings, and conclusions found to be . . . arbitrary and capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A).

50. The APA provides that a “reviewing court shall . . . hold unlawful and set aside agency action, findings, and conclusions found to be . . . without observance of procedure required by law.” 5 U.S.C. § 706(2)(D).

51. 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 could properly be detained under § 1226(a), but would then be eligible for release on bond unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.

52. Nonetheless, the Board has adopted a policy and practice of applying § 1225(b)(2) to Petitioner and others in the same position.

53. Respondents through its recent administrative decision failed to articulate any reasoned explanations for new interpretation of the Act. The Board’s decision represents a change in the agencies’ policies and positions that negates the plain language of the Act, the will of Congress, and decades of administrative precedent.

54. The application of § 1225(b)(2) to Petitioner is arbitrary, capricious, and not in accordance with law, and as such, it violates the APA. See 5 U.S.C. § 706(2).

REMEDY

55. An available remedy for Respondents' unlawful conduct as outlined in this complaint is for Petitioner to be released.

56. Immigration detention is civil in nature, and as a result Congress must have expressly authorized it by statute, and the detention must be reasonably related to its statutory purpose. *Zadvydas v. Davis*, 533 U.S. 678, 687, 690 (2001) (quoting *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)).

57. A noncitizen seeking only to challenge the legality of their detention, not the substance of their removal proceedings in immigration court, may properly ask a federal court to find jurisdiction over such a request pursuant to 28 U.S.C. § 2241. *See, e.g., Mohammed H. v. Trump*, 786 F. Supp. 3d 1149, 1154–55 (D. Minn. 2025).

58. Since Section 1225 does not apply to noncitizens who are in Petitioner's situation—who have been detained while residing within the United States for more than two years, as opposed to those who are detained while in the process of physically entering the United States, the law that Respondents are using to detain Petitioner simply does not apply so as to authorize Petitioner's detention. *See Eliseo A.A. v. Olson*, Civ. No. 25-3381 (JWB/DJF), 2025 WL 2886729 (D. Minn. Oct. 8, 2025); *Mayamu K. v. Bondi*, Civ. No. 25-3035 (JWB/LIB), 2025 WL 3641819 (D. Minn. Oct. 20, 2025); *Khalid B.Q. v. Bondi*, Civ. No. 25-4584 (JWB/DJF), Doc. No. 10 (D. Minn. Dec. 18, 2025); *Xuseen A. v. Bondi*, Civ. No. 25-4514 (JWB/DJF), Doc. No. 16 (D. Minn. Dec. 19, 2025); *Vedat C. v. Bondi*, Civ. No. 25-4642 (JWB/DJF), Doc. No. 9 (D. Minn. Dec. 19, 2025).

59. When a habeas petitioner's detention is without legal basis, the typical remedy is release. *Munaf v. Geren*, 553 U.S. 674, 693 (2008) (describing release as the "typical remedy" for "unlawful executive detention").

60. Respondents will no doubt argue, as they have in similar cases before this Court, that if the Court rules that Petitioner should have been detained pursuant to § 1226, instead of § 1225, then the remedy is a bond hearing as opposed to outright release. *See, e.g., Ahmed A.* Civ. No. 25-4776, Doc. No. 9. at 9-10. However, this Court rejected this argument, saying that:

[A] bond hearing presupposes lawful detention authority under § 1226. Where that authority has not been invoked or established, ordering a bond hearing would treat the absence of statutory authority as a mere procedural irregularity rather than a substantive defect ... Where the record shows Respondents have not identified a valid statutory basis for detention in the first place, the remedy is not to supply one through further proceedings.

Id. at Doc. No. 10 at 6.

61. Here, where detention is unlawfully based on 8 U.S.C. 1225, which does not apply to Petitioner, release is an appropriate remedy.

62. Here, a custody determination has already been made. Petitioner was already released from custody five years ago, as deemed appropriate by the Office of Refugee Resettlement. In that intervening time, no facts appear to indicate that this initial determination to release him was somehow insufficient, or that Petitioner's circumstances or actions have changed so as to now suddenly warrant re-detention. There is no legal basis for Respondents to attempt to reinstate mandatory detention, following a prior mandatory detention just by recharacterizing a previously released

noncitizen as an applicant for admission. *See, e.g., Jose J.O.E. v. Bondi*, 797 F. Supp. 3d 957, 969–70 (D. Minn. 2025).

REQUEST FOR ORDER TO SHOW CAUSE

63. Within three days, unless good cause for a delay is shown, “[a] court, justice or judge entering a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.” 28 U.S.C. § 2243.

64. Petitioner respectfully requests that the Court issue an Order to Show Cause directing Respondents to file a return within three days of the Court’s order, showing cause, if any, why a writ of habeas corpus should not be granted.

PRAYER FOR RELIEF

WHEREFORE, Mr. Tot-Choc prays that this Court grant the following relief;

- (1) Assume jurisdiction over this matter;
- (2) Issue an Order requiring Respondents to show cause as to why Petitioner should not be released immediately, or in the alternative afforded a bond hearing;
- (3) Alternatively, issue a writ of habeas corpus requiring Respondents to release Petitioner unless they provide a bond hearing under 8 U.S.C. § 1226(a) within seven days; and
- (4) Grant any other and further relief that this Court may deem just and proper.

Date: Jan. 11, 2026

/s/ Kira A. Kelley

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(802) 683-4086

**Verification by Someone Acting on
Petitioner's Behalf Pursuant to 28 U.S.C. § 2242**


I am submitting this verification on behalf of Petitioner because I am Petitioner's attorney. I have discussed the factual assertions in this petition with Petitioner's immigration attorney, Kimberly Boche, who is also acting on Petitioner's behalf and who I understand to have personal knowledge of the facts alleged herein as well as being someone who discussed these matters with Petitioner's close family and friends on his behalf. I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus, including the statements regarding Petitioner's detention status, are true and correct to the best of my knowledge.

Date: Jan. 11, 2026

/s/ Kira A. Kelley

Kira A. Kelley, Esq.

OMB Control No: 0970-0552
 Expiration Date: 03/31/2022



U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES (HHS)
OFFICE OF REFUGEE RESETTLEMENT (ORR)
DIVISION OF UNACCOMPANIED CHILDREN OPERATIONS (DUCO)
VERIFICATION OF RELEASE

VERIFICATION OF RELEASE

Name of Minor:	Oscar Ovido Tot Choc	Aliases (if any):	
Minor's Date of Birth:		Minor's A#:	

The Office of Refugee Resettlement (ORR) has released the above named minor from Federal custody pursuant to section 462 of the Homeland Security Act of 2002 and section 235 of the William Wilberforce Trafficking Victims Protection Reauthorization Act of 2008 to the care of:

	Name of Sponsor:	Lorenzo Chaman Choc		
	Aliases (if any):			
	Address:			
	City:			
	State:	TX	Zip Code:	77080
	Telephone#:			
Relationship to Child:	Father			

ACKNOWLEDGEMENT OF THE SPONSOR CARE AGREEMENT

The above named sponsor has agreed to the provisions set forth in the *Sponsor Care Agreement*, pertaining to the minor's care, safety, and well-being, and the sponsor's responsibility for ensuring the minor's presence at all future proceedings before the Department of Homeland Security and the Department of Justice/Executive Office for Immigration Review (EOIR).

FOR INTERNAL USE ONLY

Name ORR care provider Facility	BCFS Baytown
Date	05/27/2021

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