

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS

Freddy Antonio Tellez Lopez

DEFENDANTS

MARCOS CHARLES, JUAN AGUDELO, CHARLES WALL, PAMELA BONDI, KRISTI NOEM, TODD M. LYONS,

(b) County of Residence of First Listed Plaintiff Broward County, Florida (EXCEPT IN U.S. PLAINTIFF CASES)

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

(c) Attorneys (Firm Name, Address, and Telephone Number) Magdalena Cuprys & Matthew Meyers Major Case Law Group 2100 W Flagler Street, Miami, FL 33135 +1 (305) 322-6164

Attorneys (If Known)

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Grid of categories: CONTRACT, REAL PROPERTY, TORTS, CIVIL RIGHTS, PRISONER PETITIONS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, BANKRUPTCY, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes sub-sections like PERSONAL INJURY, PERSONAL PROPERTY, and LABOR.

V. ORIGIN

- 1 Original Proceeding
2 Removed from State Court
3 Re-filed (See VI below)
4 Reinstated or Reopened
5 Transferred from another district (specify)
6 Multidistrict Litigation Transfer
7 Appeal to District Judge from Magistrate Judgment
8 Multidistrict Litigation - Direct File
9 Remanded from Appellate Court

VI. RELATED/RE-FILED CASE(S) (See instructions): a) Re-filed Case YES NO b) Related Cases YES NO

JUDGE: DOCKET NUMBER:

VII. CAUSE OF ACTION 28 U.S.C. § 2241 - Petition for Writ of Habeas Corpus Challenging Prolonged and Unlawful Immigration Detention LENGTH OF TRIAL via days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT: CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ N/A CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE DATE 01/22/2026 SIGNATURE OF ATTORNEY OF RECORD Magdalena Cuprys, FL Bar No. 22460

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.

United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.

United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.

Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

VIII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

Date and Attorney Signature. Date and sign the civil cover sheet.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

FREDDY ANTONIO TELLEZ LOPEZ,

Civil Action No. 0:26cv60206

Petitioner,

v.

MARCOS CHARLES, Immigration and Customs
Enforcement (ICE) Enforcement and Removal
Operations (ERO) Acting Executive Associate
Director.

JUAN AGUDELO, Interim Miami Field Office Director.

CHARLES WALL, Principal Legal Advisor for ICE's
Office of the Principal Legal Advisor.

PAMELA BONDI, U.S. Attorney General,

KRISTI NOEM, U.S. Secretary of the Department
of Homeland Security,

TODD M. LYONS, Senior Official Performing the
Duties of the Director of US Immigration and
Customs Enforcement.

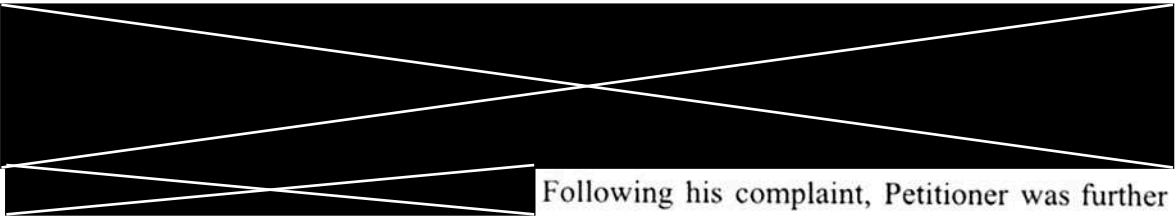
Respondents.

_____ /

PETITION FOR A WRIT OF *HABEAS CORPUS* UNDER 28 U.S.C. § 2241

INTRODUCTION

1. Petitioner Freddy Antonio Tellez Lopez (“Petitioner” or “Mr. Tellez Lopez”) is a native and citizen of Nicaragua, born on [REDACTED] as certified in his passport see **Exhibit 1**.
2. Mr. Tellez Lopez respectfully submits this Petition for a Writ of *Habeas Corpus* pursuant to 28 U.S.C. § 2241 to challenge his prolonged, unlawful, and unconstitutional civil immigration detention.
3. Mr. Tellez Lopez is a member of the nationwide Bond Eligible Class certified in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873 (C.D. Cal.), which held that noncitizens apprehended in the interior of the United States after entry without inspection are detained under 8 U.S.C. § 1226(a) and are entitled to a meaningful, individualized bond hearing.
4. Petitioner entered the United States without inspection at the border in San Luis, Arizona on April 19, 2021, was not apprehended at the border, and has lived openly and continuously in the interior of the United States for over four (4) years. During this time, Petitioner established substantial ties to the United States, including the purchase of a home and ownership of real property, demonstrating long-term residence, stability, and deep roots in the community, **Exhibit 2**.
5. On January 3, 2022, he affirmatively filed a timely application for asylum and related relief with USCIS, see **Exhibit 3**.
6. On October 1, 2025, while attending a scheduled asylum interview at the Miami Asylum Office, Mr. Tellez Lopez was unexpectedly arrested by Immigration and Customs Enforcement (“ICE”) and placed into immigration detention.
7. On October 31, 2025, DHS issued a Notice to Appear (NTA) charging Petitioner under INA § 1225(b).
8. On November 7, 2025, Petitioner filed pleadings in response. At the Initial Hearing on November 13, 2025, DHS admitted that the NTA contained inaccurate allegations and announced its intent to amend charges via Form I-261.
9. On November 10, 2025, while detained at the Broward Transitional Center (“BTC”), Petitioner [REDACTED]



Following his complaint, Petitioner was further subjected to intimidation and harassment by detention staff, exacerbating his fear, trauma, and vulnerability.

10. On December 1, 2025, Immigration Judge Michael Walleisa granted Petitioner's Motion to Withdraw Pleading Concessions, recognizing that the NTA was defective. See **Exhibit 5**.
11. Following his arrest, on December 4, 2025, the Petitioner filed a Motion for Bond Redetermination, citing *Maldonado Bautista v. Santacruz*. See **Exhibit 6**. Subsequently, on December 8, 2025, he filed a supplemental motion relying on *Quispe Sulcaray v. Noem*, which establishes that individuals apprehended in the interior of the United States after years of residence are detained pursuant to INA § 236(a). See **Exhibit 7**. These authorities squarely apply to the Petitioner, who was apprehended well within the interior of the United States after establishing substantial community ties and long-term residence
12. Nevertheless, on **December 9, 2025**, the IJ denied the Motion for Bond Redetermination, classifying the Petitioner as an "applicant for admission" under INA § 235 and concluding that the court lacked jurisdiction to consider bond. This determination was legally erroneous and reflects a fundamental misapplication of controlling law. By denying the motion solely on that classification, the IJ failed to conduct any meaningful, individualized assessment of the Petitioner's risk of flight or potential danger to the community, as expressly required under INA § 236(a). See **Exhibit 8**.
13. Petitioner also sought release from custody directly from ICE. He first submitted a Request for Release on Recognizance or Reasonable Bond **Exhibit 9**, which ICE denied. Petitioner then filed a Motion for Bond Redetermination pursuant to INA § 236(a), see **Exhibit 6**, asserting his eligibility for bond as an individual apprehended in the interior of the United States with no criminal history, substantial community ties, serious medical conditions, see **Exhibit 10**, and a qualified U.S. citizen sponsor. Despite these undisputed facts, the Immigration Judge denied jurisdiction over Petitioner's custody on **December**

- 9, 2025, relying on *Matter of Yajure-Hurtado* and erroneously classifying Petitioner as an “applicant for admission” subject to mandatory detention under INA § 235.
14. Subsequently, Petitioner moved to terminate proceedings, arguing that DHS lacked statutory authority to issue the NTA after vacatur of the negative credible fear determination. See **Exhibit 11**.
 15. During a Master Calendar Hearing on **December 15, 2025**, DHS filed its motion to pretermite, which Petitioner opposed, citing lack of Asylum Cooperative Agreement [hereinafer, “ACA”] screening, absence of transfer procedures, and country conditions demonstrating persecution risk. See **Exhibit 12**.
 16. On December 15, the Immigration Judge denied motion to pretermite without prejudice to renew at the next hearing testimony to be taken as necessary. This prolonged the process and kept Mr. Tellez Lopez in detention. See **Exhibit 13**.
 17. The IJ’s decision is particularly egregious because it ignored or failed to consider critical factors: the Petitioner’s established interior residence, strong family and community ties, absence of any criminal history, serious medical conditions, and the availability of a qualified U.S. citizen sponsor. As a result, despite the Petitioner’s diligent efforts to seek reconsideration of his custody status, he has never been afforded a meaningful, individualized bond hearing. His continued detention has persisted without any genuine evaluation of whether confinement is necessary, rendering his civil detention effectively arbitrary and punitive.
 18. On January 13, 2026, the Immigration Judge granted DHS’s Motion to Pretermite and ordered Petitioner removed to Honduras, despite his documented risk as a gay Nicaraguan dissident. See **Exhibit 14**. Petitioner has appealed said decision, arguing that the IJ erred as a matter of law and violated his due process rights. See **Exhibit 15**.
 19. Respondents have continued to detain him without ever providing a meaningful, individualized bond hearing, in direct violation of the binding declaratory judgment issued in *Maldonado Bautista v. Santacruz*. As a result, Petitioner has now been detained for more than four (4) months without lawful statutory authority or adequate procedural safeguards.
 20. Petitioner’s continued confinement under these circumstances is punitive in effect, poses an ongoing threat to his physical and psychological well-being, and serves no legitimate

governmental purpose. Because Respondents have refused to comply with controlling law and have deprived Petitioner of his liberty without due process, this Court should grant the writ and order Petitioner's immediate release. In the alternative, the Court should order Respondents to provide Petitioner with a prompt, meaningful, and individualized bond hearing pursuant to 8 U.S.C. § 1226(a), consistent with the Constitution and the judgment in *Maldonado Bautista*.

JURISDICTION

21. Petitioner is in the physical custody of Respondents. Petitioner is detained at the Broward Transitional Center ("BTC") in Pompano Beach, Florida.
22. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause).
23. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.
24. Mr. Tellez Lopez is detained in the custody of Respondents at BTC, where he has remained continuously confined since October 2025.
25. Jurisdiction is proper under 28 U.S.C. § 2241 because Petitioner is in custody under the authority of the United States and challenges the lawfulness of his detention. Congress has preserved judicial review of challenges to civil immigration detention. See *Jennings v. Rodriguez*, 138 S. Ct. 830, 841 (2018).
26. Petitioner has now been detained for more than four (4) months. He initially filed a request for release on his own recognizance, or in the alternative; see **Exhibit 10**, for the setting of a reasonable bond, and subsequently submitted a formal bond request; see **Exhibit 7**. That request was reviewed by the Immigration Court but denied for lack of jurisdiction under *Matter of Yajure-Hurtado*, 29 I&N Dec. 216 (BIA 2025), on the ground that he is an "applicant for admission" subject to mandatory detention under INA § 235; see **Exhibit 8**.

27. Petitioner's continued confinement constitutes prolonged civil detention and raises serious constitutional and humanitarian concerns, including exposure to abuse and the lack of adequate protection against harm. Judicial review is therefore required to safeguard Petitioner's fundamental rights under the Due Process Clause.

VENUE

28. Venue is proper in the Southern District of Florida pursuant to 28 U.S.C. § 1391 because Petitioner is physically detained at BTC in Broward County, Florida. He has remained in immigration custody continuously since October 1, 2025.


29. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493- 500 (1973), venue lies in the United States District Court for the Southern District of Florida, the judicial district in which Petitioner currently is detained.

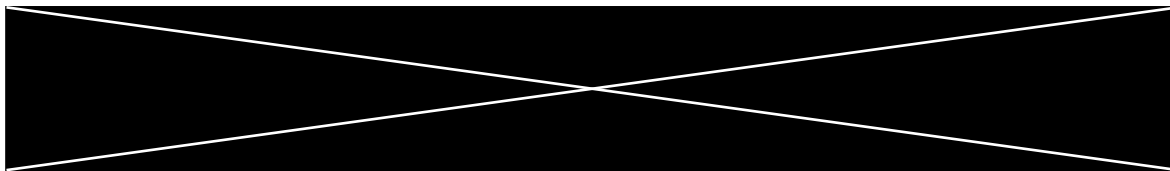
30. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the Southern District of Florida.

REQUIREMENTS OF 28 U.S.C. § 2243

31. *Habeas* relief is warranted forthwith. *Habeas corpus* is intended to provide a swift and imperative remedy for unlawful restraint. *Fay v. Noia*, 372 U.S. 391, 400 (1963). Petitioner's detention has already been adjudicated as unlawful for class members under *Maldonado Bautista*, and further delay exacerbates ongoing constitutional harm.

PARTIES

32. Respondents are detaining **Mr. Tellez Lopez** at BTC in Pompano Beach, Florida, pending removal proceedings. While in Respondents' custody, Mr. Tellez Lopez 



33. Respondent **Kristi Noem** is the Secretary of the United States DHS and is responsible for the administration of immigration laws, 8 U.S.C. § 1103(a). Secretary Noem is a legal custodian of Petitioner and is named in her official capacity.
34. Respondent **Todd M. Lyons** is the ICE Director, responsible for the overall administration of all ICE detention facilities, including BTC.
35. Respondent **Juan Agudelo** is the Interim Field Office Director for the Miami ICE Field Office and has administrative jurisdiction over Petitioner's case.
36. Respondent **Pamela Bondi** is the Attorney General of the United States and the senior official in the DOJ. She delegates authority over removal cases to the Executive Office for Immigration Review (hereinafter, "EOIR"), which administers the Immigration Courts and the Board of Immigration Appeals (hereinafter, "BIA"). She is named in her official capacity.
37. Respondent **Marcos Charles** is the Acting Executive Associate Director of ICE ERO. In this capacity, he leads the division responsible for the identification, arrest, detention, and removal of noncitizens. He has direct authority over the ERO policies that govern Petitioner's detention and is a legal custodian of the Petitioner;
38. Respondent **Charles Wall** is the Principal Legal Advisor for ICE. In this capacity, he leads the Office of the Principal Legal Advisor (hereinafter, "OPLA"), which serves as the exclusive representative of DHS in immigration court proceedings. He has final authority over the legal positions taken by ICE attorneys regarding Petitioner's custody and removal. He is a legal custodian of the Petitioner and is named in his official capacity.
39. Each of these Respondents is a legal custodian of Petitioner and is named in his/her official capacities.

LEGAL BACKGROUND

Jurisdiction and Authority

40. This Court has jurisdiction to review the lawfulness of Petitioner's detention pursuant to **28 U.S.C. § 2241**. Petitioner is currently detained under the authority of the **DHS**, acting through **ICE**.

Relevant Statutes:

INA § 235 defines "applicant for admission" and the authority of Immigration Judges (IJ) regarding bond eligibility. Petitioner herein is not an "applicant for admission."

INA § 236(a) requires a meaningful, individualized custody determination when considering release on bond, including assessment of risk of flight, danger to the community, ties to the United States, and medical or humanitarian considerations. Petitioner herein is not a flight risk, does not pose a danger to the community, and humanitarian considerations warrant his release from custody.

Precedent Cases

41. Relevant case law supports the Petitioner's entitlement to release or a bond hearing: *Zadvydas v. Davis*, 533 U.S. 678 (2001) – prolonged detention must be reasonably justified.
42. *Guerra v. Shanahan*, 831 F.3d 59 (2d Cir. 2016) – individual assessment required before continued detention.
43. *Maldonado-Bautista v. Santacruz*; *Quispe-Sulcaray v. Noem* – emphasizing individualized review in immigration custody matters.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF – Violation of Fifth Amendment Substantive Due Process

44. Petitioner Mr. Tellez Lopez has been subjected to civil detention that is punitive in effect, under conditions harming his physical and mental health. The detention is excessive relative to any legitimate governmental objective, in violation of the Fifth Amendment.

SECOND CLAIM FOR RELIEF – Violation of Fifth Amendment Procedural Due Process

45. The petitioner has been detained for approximately four (4) months. Although he received a bond hearing in December 2025, as stated above, the IJ claimed that he had no jurisdiction to consider the Petitioner's request for release. Therefore, Petitioner never received a meaningful and individualized bond hearing pursuant to INA § 236(a).

THIRD CLAIM FOR RELIEF – Unconstitutional Conditions of Detention

46. Although immigration detention is civil in nature, Petitioner has been subjected to conditions that effectively deprive him of basic human needs and place him at substantial risk of physical and psychological harm. These conditions at BTC include inadequate medical care, lack of mental health support, failure to respond to emergencies, overcrowding, poor hygiene, and incidents of inappropriate conduct by detention personnel.

47. Prolonged confinement without a meaningful and individualized custody determination, combined with these unsafe and inhumane conditions, violates Petitioner's Fifth Amendment rights to procedural and substantive due process, which ensure basic human dignity and protection from punitive treatment. Internal grievance mechanisms do not provide timely or effective relief, and Petitioner remains at ongoing risk of serious harm.

FOURTH CLAIM FOR RELIEF – Arbitrary and Unreasonable Detention

48. Petitioner's detention is arbitrary, lacking individualized justification, and bears no rational connection to legitimate governmental objectives, in violation of the fundamental legal rights.

FIFTH CLAIM FOR RELIEF – Unlawful Detention Beyond Statutory Authority


49. Petitioner's continued detention exceeds the authority granted by INA §§ 1226 and/or 1231, and is therefore unlawful.

PRAYER FOR RELIEF

50. WHEREFORE, Petitioner Mr. Tellez Lopez respectfully requests that this Honorable Court:

1. Exercise jurisdiction over this Petition for Writ of *Habeas Corpus* pursuant to 28 U.S.C. § 2241;
2. Order Petitioner's immediate release from DHS custody, with or without reasonable conditions of supervision;
3. Issue a Writ of *Habeas Corpus* requiring Respondents to justify Petitioner's continued detention;
4. Declare that Petitioner's prolonged civil immigration detention, including the ineffective bond determination in December 2025, violates the Due Process Clause of the Fifth Amendment;
5. Declare that the conditions under which Petitioner is detained at BTC render his continued confinement punitive in effect and unconstitutional under the Fifth Amendment's Due Process Clause;
6. Declare that Petitioner's removal to Honduras would violate the United States' non-refoulement obligations under INA § 241(b)(3) and Article 3 of the CAT, given Petitioner's history of sexual abuse in Honduras and the systemic violence faced by LGBTQ individuals, as documented by international human rights organizations;
7. Order Respondents to cease detaining Petitioner in violation of the Constitution;
8. Retain jurisdiction to ensure compliance with the Court's order; and
9. Grant such other and further relief as this Court deems just and proper.

EXHIBITS

- **Exhibit 1** – A copy of the passport del Petitioner, Mr. Tellez Lopez.
- **Exhibit 2** – Records and evidence concerning physical presence.
- **Exhibit 3** – A copy Form I-589 asylum application
- **Exhibit 4** – Attorney email notifying ICE of 
- **Exhibit 5** – A copy Notice of Filing - Motion to Withdraw Pleading Concessions.
- **Exhibit 6** – A copy of the Motion for Bond Redetermination
- **Exhibit 7** – A copy of the Motion for Bond Redetermination Supplemental.
- **Exhibit 8** – A copy of the IJ Order denying Bond, Dec 9, 2025.
- **Exhibit 9** – A copy of Request for Release on Recognizance / Reasonable Bond
- **Exhibit 10** – A copy of Mr. Tellez Lopez's Medical Records.
- **Exhibit 11** – A copy of the Motion to Terminate Removal Proceedings.
- **Exhibit 12** – Copy of the order of the Immigration Judge from 12/15/2025
- **Exhibit 13** – A copy of the Mr. Tellez Lopez's motion opposing DHS Motion to Pretermit.
- **Exhibit 14** – Copy of the order of the Immigration Judge from 01/13/2026
- **Exhibit 15** – A copy EOIR-26 filing and BIA appeal

Dated: January 23, 2026

Respectfully submitted,

MAGDALENA CUPRYS
MATTHEW MEYERS

Major Case Law Group.
2100 W. Flagler Street,
Miami, FL. 33135
Tel.: (305) 322-6164
info@majorcaselawgroup.com

Verification

I declare under penalty of perjury that the facts set forth in the foregoing Verified Petition for Writ of *Habeas Corpus* are true and correct to the best of my knowledge, information, and belief.



Signature Petitioner

Dated: January 23, 2026