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5 JOHN R. SHACKELFORD*
Idaho Bar No. 8647
6 Blender Law Office
300 W. Myrtle St., Suite 200 Boise,
7 ID 83702
(208)-287-8203
8 jshackelford@blenderlawoffice.com

9 Attorneys for Petitioner
*Petition for Pro Hac Vice filed
10 concurrently

11 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

12
13 KLINSMANN BECERRA DIAZ,
14 Petitioner,

15 v.

16 JASON KNIGHT, Field Office Director of
Enforcement and Removal Operations, Salt
17 Lake City Field Office, Immigration and
Customs Enforcement; KRISTI NOEM,
18 Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
19 HOMELAND SECURITY; PAMELA BONDI,
U.S. Attorney General; EXECUTIVE OFFICE
20 FOR IMMIGRATION REVIEW; JOHN
MATTOS, Warden of Nevada Southern
21 Detention Center,

22 Respondents.

Case No. 2:26-cv-00247

Agency No. 

**MOTION FOR TEMPORARY
RESTRAINING ORDER AND
SUPPORTING MEMORANDUM**

23
24

1 **MOTION FOR TEMPORARY RESTRAINING ORDER**

2 Petitioner, Klinsmann Becerra Diaz, by and through his attorneys Kathia Quiros (Nevada
3 Bar No. 8874) and John R. Shackelford (Idaho Bar No. 8647, Pro Hac Vice Pending),
4 respectfully moves this Court pursuant to Fed. R. Civ. P. 65 for a Temporary Restraining Order
5 (TRO) against Respondents to preserve the status quo while the Court considers Petitioner’s
6 Petition for Writ of Habeas Corpus.

7 **RELIEF REQUESTED**

8 Petitioner respectfully requests that the Court issue a TRO:

- 9
- 10 1. Preventing Respondents from removing, transferring, or deporting Petitioner from the
11 jurisdiction of the District of Nevada;
 - 12 2. Preserving Petitioner’s access to counsel and necessary documents;
 - 13 3. Granting any other relief the Court deems just and proper.

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 **I. INTRODUCTION**

16 Petitioner is currently detained at the Nevada Southern Detention Center and faces
17 imminent risk of removal or transfer by Respondents. Petitioner has filed a Petition
18 for Writ of Habeas Corpus asserting that his continued detention violates federal law
19 and constitutional protections. Immediate injunctive relief is necessary to prevent
20 irreparable harm before the Court can consider the habeas petition.

21 **II. LEGAL STANDARD**

22 Under Fed. R. Civ. P. 65(b) and Ninth Circuit precedent, a TRO may be granted if the
23 moving party demonstrates:
24

- 1 1. Likelihood of success on the merits of the underlying claim;
- 2 2. Imminent and irreparable harm in the absence of preliminary relief;
- 3 3. Balance of equities favors the moving party; and
- 4 4. Injunction is in the public interest.

5 See *Winter v. Natural Resources Defense Council*, 555 U.S. 7, 20 (2008); *Munaf v.*
6 *Geren*, 553 U.S. 674 (2008).

7 **III. ARGUMENT**

8 **a. Likelihood of Success on the Merits**

9 Petitioner's habeas petition demonstrates that his detention violates constitutional
10 and statutory law. The factual and legal claims supporting this are set forth in the
11 accompanying habeas petition.

12 **b. Imminent and Irreparable Harm**

13 Without a TRO, Petitioner may be removed or transferred out of the District of
14 Nevada, which would:

- 15 1. Make it impossible to pursue habeas relief effectively;
- 16 2. Interfere with counsel's ability to access records and communicate with
17 Petitioner;
- 18 3. Result in irreparable harm that cannot be remedied after the fact.

19 **c. Balances of Equities**

20 The temporary preservation of Petitioner's status quo imposes minimal burden on
21 Respondents but is critical to protecting Petitioner's statutory and constitutional
22 rights. The balance favors granting the TRO.

1 **d. Public Interest**

2 The public interest is served by ensuring that individuals have meaningful access
3 to the courts and that habeas rights are preserved pending adjudication.

4 **IV. REQUEST FOR EXPEDITED CONSIDERATION**

5 Given the imminent risk of transfer or removal, Petitioner requests that the Court
6 consider this motion on shortened notice and enter the TRO immediately.

7 **V. CONCLUSION**

8 For the foregoing reasons, Petitioner respectfully requests that the Court:

- 9
- 10 1. Issue a temporary restraining order preserving the status quo;
 - 11 2. Grant Petitioner all other relief the Court deems just and proper.

12 DATED: This 3rd day of February, 2026

13
14 /s/ Kathia Quiros
KATHIA QUIROS
Nevada Bar No. 8874
Attorney for Petitioner
GWP IMMIGRATION LAW
8942 Spanish Ridge Ave., Ste. 1
Las Vegas, NV 89148
(702) 737-7717
jc@gwp.law

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16
17
18
19 /s/ John R. Shackelford
John R. Shackelford (Pro Hac Vice Pending)
Idaho Bar No. 8647
BLENDER LAW OFFICE
300 W. Myrtle St., Suite 200
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10 Attorneys for Petitioner

11 UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

12
13 KLINSMANN BECERRA DIAZ,


Petitioner,

14
15 v.

16 JASON KNIGHT, Field Office Director of
Enforcement and Removal Operations, Salt
17 Lake City Field Office, Immigration and
Customs Enforcement; KRISTI NOEM,
18 Secretary, U.S. Department of Homeland
Security; U.S. DEPARTMENT OF
19 HOMELAND SECURITY; PAMELA BONDI,
U.S. Attorney General; EXECUTIVE OFFICE
20 FOR IMMIGRATION REVIEW; JOHN
MATTOS, Warden of Nevada Southern
21 Detention Center,

22 Respondents.

Case No.

Agency No. 

INDEX OF EXHIBITS

23
24

EXHIBIT	DESCRIPTION
A	Passport biographic page
B	Notice to Appear
C	Marriage certificate
D	Spouse's naturalization certificate
E	Step-son's U.S. birth certificate
F	Judgment of Conviction
G	Form I-213
H	ICE locator printout
I	Approved I-130, Relative Petition
J	Employer Letter
K	Employment Authorization Document
L	I-589 Receipt Notice
M	Bond denial

DATED: This 3rd day of February, 2026

/s/ Kathia Quiros
 KATHIA QUIROS
 Nevada Bar No. 8874
 Attorney for Petitioner
 GWP IMMIGRATION LAW
 8942 Spanish Ridge Ave., Ste. 1
 Las Vegas, NV 89148
 (702) 737-7717
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/s/ John R. Shackelford
 John R. Shackelford (Pro Hac Vice Pending)
 Idaho Bar No. 8647
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Exhibit B

Uploaded on: 2/15/2023 at 11:25:33 a.m. (Mountain Standard Time) Base City: SLC

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

DOB: [REDACTED]

Event No: [REDACTED]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

File No: [REDACTED]

In the Matter of:

Respondent: KLINSMANN BACILIO BECERRA-DIAZ

currently residing at:

[REDACTED] Meridian, IDAHO, 83642

(208) 831-6380

(Number, street, city, state and ZIP code)

(Area code and phone number)

- You are an arriving alien.
- You are an alien present in the United States who has not been admitted or paroled.
- You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of COLOMBIA and a citizen of COLOMBIA;
3. You entered the United States at or near Eagle Pass, TX, on or about April 11, 2022;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212 (a) (6) (A) (i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- Section 235(b)(1) order was vacated pursuant to: 8CFR 208.30 8CFR 235.3(b)(5)(iv)

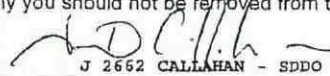
YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

2975 S DECKER LAKE DR, STE 200 WEST VALLEY CITY UT 841196094. EOIR Salt Lake City, UT

(Complete Address of Immigration Court, including Room Number, if any)

on December 3, 2024 at 1:00 PM to show why you should not be removed from the United States based on the
(Date) (Time)

charge(s) set forth above.


J 2662 CALLAHAN - SDDO

(Signature and Title of Issuing Officer)

Date: January 12, 2023

Boise, Idaho

(City and State)

This Notice to Appear Supersedes the Notice to Appear issued on April 12, 2022

EOIR - 1 of 3

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-8903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

(Signature of Respondent)

Date: _____

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on January 12, 2023, in the following manner and in compliance with section 239(a)(1) of the Act.

- in person by certified mail, returned receipt # _____ requested by regular mail
- Attached is a credible fear worksheet.
- Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the _____ language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

(Signature of Respondent if Personally Served)

DAVID PERKINS - Deportation Officer

(Signature and Title of officer)

EOIR - 2 OF 3

Privacy Act Statement

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

Exhibit G

U.S. Department of Homeland Security

Subject ID :

Record of Deportable/Inadmissible Alien

Family Name (CAPS) BECERRA-DIAZ, KLINSMANN BACILIO		First	Middle	Sex M	Hair BLK	Eyes BRO	Cmplxn LBR
Country of Citizenship COLOMBIA	Passport Number and Country of Issue	File Number 		Height 60	Weight 160	Occupation Employee	
U.S. Address				Scars and Marks			
Date, Place, Time, and Manner of Last Entry 04/11/2022 Unknown Time, EGP, WI-Without Inspection			Passenger Boarded at	F.B.I. Number 			
Number, Street, City, Province (State) and Country of Permanent Residence				<input type="checkbox"/> Single <input type="checkbox"/> Divorced <input type="checkbox"/> Married <input type="checkbox"/> Widower <input type="checkbox"/> Separated			
Date of Birth 	Age: 35	Date of Action	Location Code BOI/SLC	Method of Location/Apprehension NCA			
City, Province (State) and Country of Birth COLOMBIA	AR <input checked="" type="checkbox"/>	Form : (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/>		At/Near See I-831	Date/Hour 01/13/2026 09:35		
NIV Issuing Post and NIV Number	Social Security Account Name			By A 3114 CHAMBERLAND			
Date Visa Issued	Social Security Number			Status at Entry	Status When Found		
Immigration Record POSITIVE - See Narrative		Criminal Record See Narrative					
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)				Number and Nationality of Minor Children None			
Father's Name, Nationality, and Address, if Known CARLOS NATIONALITY: COLOMBIA		Mother's Present and Maiden Names, Nationality, and Address, if Known MARIA NATIONALITY: COLOMBIA					
Monies Due/Property in U.S. Not in Immediate Possession None Claimed		Fingerprinted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Systems Checks See Narrative	Charge Code Words(s) See Narrative			
Name and Address of (Last)(Current) U.S. Employer See Narrative		Type of Employment Unrelated	Salary	Employed from/to Hr 10/23/2023			
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.) FIN: Left Index fingerprint Right Index fingerprint							
							
FAMILY INFORMATION							
Father: CARLOS is a citizen of COLOMBIA. Mother: MARIA is a citizen of COLOMBIA. Spouse: Subject is not married. Child: Subject does not have children or dependents.							
IMMIGRATION RECORD							
History was expected but not provided ... (CONTINUED ON I-831)							
Alien has been advised of communication privileges _____ (Date/Initials)				_____ (Signature and Title of Immigration Officer)			
Distribution:				Received: (Subject and Documents) (Report of Interview)			
				Officer: _____			
				on: _____ (time)			
				Disposition: Other			
				Examining Officer: _____			

EOIR - 1 of 3

EXHIBIT G

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name BECERRA-DIAZ, KLINSMANN BACILIO	File Number [REDACTED] Event No: [REDACTED]	Date 01/13/2026
---	---	--------------------

SUBJECT HEALTH STATUS

The subject claims good health.

CURRENT ADMINISTRATIVE CHARGES

01/14/2026 - 212a6Ai - ALIEN PRESENT WITHOUT ADMISSION OR PAROLE - (PWAs)

RECORDS CHECKED

CIS checked on 01/13/2026 with Positive result. EARM checked on 01/13/2026 with Positive result. IAFIS checked on 01/13/2026 with Positive result. NCIC checked on 01/13/2026 with Negative result. TECS checked on 01/13/2026 with Negative result.

NAME AND ADDRESS OF US EMPLOYER

JTS MISSION CRITICAL GROUP, 1711 SLIPSTREAM WAY CALDWELL, IDAHO, 83605, UNITED STATES

ARRESTED AT/NEAR

[REDACTED] BOISE, IDAHO, 837091656, UNITED STATES

RECORD OF DEPORTABLE/EXCLUDABLE ALIEN:

ENCOUNTER DATA

BECERRA-Diaz, Klinsmann Bacilio, was encountered at the Boise ERO Office during a routine non-detained scheduled appointment. Record checks revealed that BECERRA was convicted of Driving Under the Influence on 03/20/2023, violating his condition and terms of his Order of Recognizance. BECERRA was arrested and placed into ICE custody pending detained hearings.

ENTRY DATA

BECERRA stated to a US Border Patrol Agent that he entered the United States on or about 04/11/2022 at or near Eagle Pass, TX without inspection by U.S. Immigration Officer and he is a citizen and national of Colombia by virtue of birth. BECERRA was not in possession of valid immigration documents allowing him/her to be or remain in the United States legally. BECERRA was served with a Notice to Appear (NTA) I-862 form and approved for release on their own recognizance with an I-220 (A).

IMMIGRATION HISTORY

DHS database checks indicate no prior immigration history for BECERRA.

CRIMINAL HISTORY

On 03/20/2023, BECERRA was convicted by the Ada County District Court, for the offense of Driving Under the Influence in violation of Idaho Code 18-8004(1)(a), a Misdemeanor, for which he was sentenced to a term of 180 days jail. Case No. # [REDACTED]

SQ-11/NN-13 records check for outstanding wants, warrants, and lookouts were negative.

BASIS FOR ICE CHARGES

BECERRA makes no claim to USC or LPR and is amenable to removal under section 212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that (LAST) is an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General

DISPOSITION

Signature	Title
-----------	-------

EOTR - 2 of 3

U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name BECERRA-DIAZ, KLINSMANN BACILIO	File Number [REDACTED] Event No: [REDACTED]	Date 01/13/2026
---	---	--------------------

BECERRA was advised of his right to speak to a consulate officer from Colombia. BECERRA states he has fear of persecution or torture if removed to Colombia. BECERRA has an approved I-130 and an I-589 that has been admin closed. BECERRA was placed into ICE custody pending detained hearings, form I-830 completed and sent to EOIR. BECERRA was provided a list of free legal services. BECERRA was provided a copy of the On-line Detainee Locator System privacy notice. BECERRA will be held in ICE custody pending removal from the United States. BECERRA claims he did not attend/graduate high school in the United States. BECERRA claims he did not receive a G.E.D. or equivalent. BECERRA claims he did not serve in the United States military. BECERRA claims to have 2 children. 1 adult USC and 1 minor child living in Colombia. BECERRA claims to be married. Ariel PEREZ-Castillo, USC ([REDACTED]), DOB: [REDACTED]. BECERRA claims to be in good health and states he is not currently under the care of a physician and is not taking any medications. BECERRA completed a phone call on 01/13/2026. BECERRA called: Spouse, Ariel PEREZ-Castillo, phone [REDACTED], at 0945.

OTHER IDENTIFYING NUMBERS

[REDACTED]

Signature	Title
-----------	-------

EOIR - 3 of 3

Exhibit H

Official Website of the Department of Homeland Security



U.S. Immigration and Customs Enforcement

Report Crimes: Email or Call 1-866-DHS-2-ICE

Home Who We Are **What We Do** Newsroom Information Library Contact ICE

Search Results: 1

KLINSMANN BACILIO BECERRA-DIAZ

Country of Birth : Colombia

A-Number:

Status : In ICE Custody

State: NV

Current Detention Facility: NEVADA SOUTHERN DETENTION CENTER

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

[BACK TO SEARCH >](#)

Related Information

Helpful Info

- [Status of a Case](#)
- [About the Detainee Locator](#)
- [Brochure](#)
- [ICE ERO Field Offices](#)
- [ICE Detention Facilities](#)
- [Privacy Notice](#)

External Links

- [Bureau of Prisons Inmate Locator](#)



[DHS.gov](#) [USA.gov](#) [OIG](#) [Open Gov](#) [FOIA](#) [Metrics](#) [No Fear Act](#) [Site Map](#) [Site Policies & Plug-Ins](#)

Exhibit J



January 21, 2026

To whom it may concern,

This letter is to verify that Klinsmann Becerra Diaz has been employed with **Johnson Thermal Systems (JTS)** from 11/10/2025 to 01/12/2026

Sincerely,

A handwritten signature in cursive script that reads 'Nicol Gahley'.

Nicol Gahley
HR Business Partner

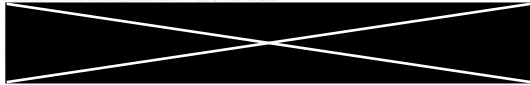


EXHIBIT J

JTS.com

Exhibit L

U.S Department of Justice
Executive Office for Immigration Review
Immigration Court
2975 South Decker Lake Drive # 200
West Valley City, UT 84119-6094

PRO-SE

Re: Klinsmann Bacilio Becerra Diaz

A- Number: 

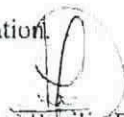
Dear Clerk of the Court:

Attached please find above- reference individual's application for Asylum, Withholding of Removal, and relief under the Convention against Torture (Form I-589). Pursuant to OPPM 16-01, I am hereby filing Form I-589, on Mr. Klinsmann Bacilio Becerra Diaz, behalf. Enclosed please find.

1. An original Application for Asylum and for Withholding of Removal (Form I-589), plus one copy for return services.
2. One passport-sized photograph of Mr. Klinsmann Bacilio Becerra Diaz is attached to a page of the original Form I-589.
3. One copies of Ms. Klinsmann Bacilio Becerra Diaz Colombian passport.

Please do not hesitate to contact me at the number indicated if you have any questions regarding this matter. Thank you for your consideration.

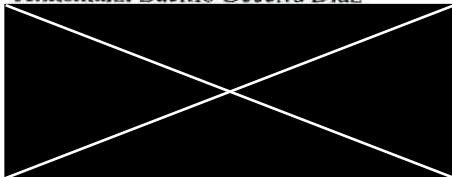
Sincerely,



Klinsmann Bacilio Becerra Diaz



Klinsmann Bacilio Becerra Diaz



DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR
IMMIGRATION REVIEW

APR 26 2023

FILED WITH
IMMIGRATION COURT
SALT LAKE CITY, UTAH

EOIR - 1 of 114

Exhibit M



UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
LAS VEGAS IMMIGRATION COURT

Respondent Name:

BECERRA-DIAZ, KLINSMANN

To:

Shackelford, John Richard
300 W. Myrtle Street
Suite 200
Boise, ID 83702

A-Number:



Riders:

In Custody Redetermination Proceedings

Date:

01/27/2026

ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent’s request for a change in custody status is hereby ordered:

Denied, because

Immigration Judges only have the authority to consider matters that are delegated to them by the Attorney General and the Immigration and Nationality Act. Matter of A-W-, 25 I&N Dec. 45, 46 (BIA 2009), citing 8 CFR § 1003.10(b).

The DHS argues that the Court lacks jurisdiction to grant a bond in this matter. This Court recognizes that litigation surrounding bond eligibility has been ongoing since the BIA’s decision in Matter of Yajure Hurtado largely stripped immigration courts of the ability to grant bonds. Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025). The Court acknowledges the orders in Maldonado Bautista v. Santacruz et al., 2025 WL 3288403 (Nov. 25, 2025) and 2025 WL 3713987 (Dec. 18, 2025). Some federal district courts, including the District of Nevada, have held that the Maldonado Baustista Court’s ruling extended declaratory relief to the certified class.

The official position of EOIR is that Maldonado Bautista is not a nationwide injunction and does not purport to vacate, stay, or enjoin Yajure Hurtado. Therefore, Yajure Hurtado remains binding precedent on agency adjudicators. For clarification, declaratory judgments differ from injunctions in that the former clarifies parties’ legal rights and relationships without ordering specific action, while the latter is a court order compelling a party to do or stop doing a specific act. A declaratory judgment is not an equitable remedy and does not, by itself, have the effect of compelling a specific action by a party.

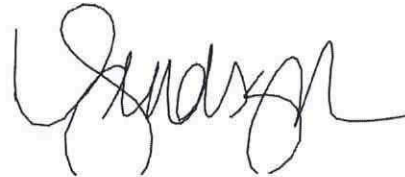
Pursuant to official agency policy, immigration courts no longer have the authority to issue bonds to any individual falling under Matter of Yajure Hurtado (namely any individual who has not been admitted to the United States). Because this court lacks

the delegated authority to consider bond for individuals who have not been admitted to the United States, this Court must find that the respondent is not eligible for release on bond.

- Granted. It is ordered that Respondent be:
 - released from custody on his own recognizance.
 - released from custody under bond of \$
 - other:

Other:

The Court notes that the respondent has not been granted individualized relief from the District Court. Should any reviewing Court determine that this Court has jurisdiction, or that the respondent must be provided a bond hearing, the Court makes the alternative finding that bond in the amount of \$2,000 plus alternatives to detention at the discretion of the DHS is an appropriate amount to ensure the respondent's appearance at future hearings.



Immigration Judge: ROBERTS, LINDSY 01/27/2026

Appeal: Department of Homeland Security: waived reserved
 Respondent: waived reserved

Appeal Due: 02/26/2026

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Respondent Name : BECERRA-DIAZ, KLINSMANN | A-Number : 

Riders:

Date: 01/27/2026 By: MILLS, MELISSA, Court Staff