

AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

Jose Alfonso Ortega Hernandez)

Petitioner)

v.)

Juan Agudelo, Garrett Ripa, Todd M. Lyons, Kristi Noem, Pam Bondi)

Respondent)


(name of warden or authorized person having custody of petitioner)

Case No. _____

(Supplied by Clerk of Court)

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

Personal Information

1. (a) Your full name: Jose Alfonso Ortega Hernandez
 (b) Other names you have used: _____
2. Place of confinement:
 (a) Name of institution: Broward Transitional Center
 (b) Address: 3900 N. Powerline Road
 Pompano Beach, FL 33073
 (c) Your identification number: 
3. Are you currently being held on orders by:
 Federal authorities State authorities Other - explain:
 DHS/ICE immigration _____
4. Are you currently:
 A pretrial detainee (waiting for trial on criminal charges)
 Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
 If you are currently serving a sentence, provide:
 (a) Name and location of court that sentenced you: _____
 (b) Docket number of criminal case: _____
 (c) Date of sentencing: _____
 Being held on an immigration charge
 Other (explain): _____

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Decision or Action You Are Challenging

- 5. What are you challenging in this petition:
 - How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)
 - Pretrial detention
 - Immigration detention
 - Detainer
 - The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
 - Disciplinary proceedings
 - Other (*explain*): _____

- 6. Provide more information about the decision or action you are challenging:
 - (a) Name and location of the agency or court: I am challenging the respondents' re-detaining and continuing to detain me for more than a year
 - (b) Docket number, case number, or opinion number: _____
 - (c) Decision or action you are challenging (*for disciplinary proceedings, specify the penalties imposed*): _____

 - (d) Date of the decision or action: 01/26/2025

Your Earlier Challenges of the Decision or Action

- 7. **First appeal**
 Did you appeal the decision, file a grievance, or seek an administrative remedy?
 Yes No
 - (a) If "Yes," provide:
 - (1) Name of the authority, agency, or court: _____
 - (2) Date of filing: _____
 - (3) Docket number, case number, or opinion number: _____
 - (4) Result: _____
 - (5) Date of result: _____
 - (6) Issues raised: _____

(b) If you answered "No," explain why you did not appeal:

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a second appeal:

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

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(b) If you answered "No," explain why you did not file a third appeal:

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

Yes No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

Yes No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion or a Section 2254 to petition to challenge this conviction or sentence?*

Yes No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

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- (c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence:

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

- Yes No

If "Yes," provide:

- (a) Date you were taken into immigration custody: 01/26/2025
- (b) Date of the removal or reinstatement order: 03/08/2022
- (c) Did you file an appeal with the Board of Immigration Appeals?

- Yes No

If "Yes," provide:

- (1) Date of filing:
- (2) Case number:
- (3) Result:
- (4) Date of result:
- (5) Issues raised:

- (d) Did you appeal the decision to the United States Court of Appeals?

- Yes No

If "Yes," provide:

- (1) Name of court:
- (2) Date of filing:
- (3) Case number:

- (4) Result:
- (5) Date of result:
- (6) Issues raised:

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

- Yes No

If "Yes," provide:

- (a) Kind of petition, motion, or application:
- (b) Name of the authority, agency, or court:

- (c) Date of filing:
- (d) Docket number, case number, or opinion number:
- (e) Result:
- (f) Date of result:
- (g) Issues raised:

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground.

GROUND ONE: The respondents are violating petitioner's constitutional due process rights and statutory right to be released by detaining the petitioner for more than one year following a final removal order where his removal is not likely to occur in the reasonably foreseeable future.

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(a) Supporting facts *(Be brief. Do not cite cases or law.):*

The petitioner illegally reentered the United States in 2022. He was placed under supervision with conditions, including wearing an electronic monitoring device. Even though he complied with all conditions of supervision, he was re-detained on January 26, 2025. He has claimed to have a reasonable fear of persecution if he is sent back to Honduras. An immigration judge denied his request for withholding of removal and the appeal of the denial has been pending for more than seven months. The appeal of the denial of his application for withholding of removal does not impact the finality of the removal order which was issued in 2014.

(b) Did you present Ground One in all appeals that were available to you?

Yes

No

GROUND TWO:

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

(b) Did you present Ground Two in all appeals that were available to you?

Yes

No

GROUND THREE:

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

(b) Did you present Ground Three in all appeals that were available to you?

Yes

No

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GROUND FOUR:

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

(b) Did you present Ground Four in all appeals that were available to you?

Yes

No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

Request for Relief

15. State exactly what you want the court to do: Immediate release from custody.

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Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 02/09/2026

Signature of Petitioner

s/Monica M. Beamer, Esq.
Signature of Attorney or other authorized person, if any

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

Case No.:

JOSE ALFONSO ORTEGA HERNANDEZ,

Petitioner,

v.

JUAN AGUDELO, Director/Warden
Broward Transitional Center operated by GEO
GROUP
U.S. Immigration and Customs Enforcement,

GARRETT RIPA, Field Office Director,
U.S. Immigration and Customs Enforcement
Miami Field Office,


TODD M. LYONS, Acting Director,
U.S. Immigration and Customs Enforcement,

KRISTI NOEM, Secretary,
Department of Homeland Security,

PAM BONDI, U.S. Attorney General

Respondents.

PETITION FOR WRIT OF HABEAS CORPUS

COMES NOW the petitioner, Jose Alfonso Ortega Hernandez (“Petitioner” or “Ortega Hernandez”), assigned alien number A  challenging his unlawful detention by the Department of Homeland Security (“DHS”), Immigration and Customs Enforcement (“ICE”) (collectively “Respondents”) by and through undersigned counsel, and respectfully petitions this Honorable Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241.

PRELIMINARY STATEMENT

The petitioner seeks immediate release from immigration detention because the respondents have violated his constitutional rights by detaining him for more than a year. The petitioner is presently detained at the Broward Transitional Center located at 3900 N. Powerline Road in Pompano Beach, Florida.

Ortega Hernandez is a native and citizen of Honduras, who was ordered removed on August 14, 2014. He was removed from the United States on September 8, 2014. He illegally reentered the United States with his wife and children, and his prior removal order was reinstated. On March 8, 2022, ICE placed him under supervision with conditions, and he complied with every condition, and he lived at large for almost three years. On January 26, 2025, he was arrested at his home, and he has been in the respondents' custody ever since.

Ortega Hernandez left Honduras because he was afraid of being persecution on one of the grounds for protection through asylum, withholding of removal, or relief under the Convention Against Torture. After he told immigration officers that he was afraid of being persecuted if he returned to Honduras, an asylum officer found that his fear was reasonable. He was referred to immigration court for withholding-only proceedings, but an immigration judge decided that Ortega Hernandez did not have a reasonable fear and denied his application on July 7, 2025. He appealed that decision to the Board of Immigration Appeals on July 8, 2025, and it remains pending seven months later.

Notwithstanding the appeal, however, there is a final removal order in place. Ortega Hernandez has been detained longer than both the statutory and the presumptive post-removal detention period that started when his removal order became final. The respondents' continued

detention of Ortega Hernandez for more than a year is unconstitutional. He asks this Honorable Court to grant his petition for writ of habeas corpus and enter an order directing the respondents to release him immediately.

JURISDICTION AND VENUE

This action arises under the Due Process Clause of the United States Constitution, the Immigration and Nationality Act (“INA” “Act”), and the implementing regulations. The Court has subject matter jurisdiction pursuant to 28 U.S.C. § 2241, which authorizes district courts to issue writs of habeas corpus when a petitioner shows that he is being held in custody in violation of the Constitution, laws, or treaties of the United States. The Court’s habeas corpus jurisdiction includes challenges involving immigration detention, *see Zadvydas v. Davis*, 533 U.S. 678, 687 (2001).

Ortega Hernandez challenges the legality of his detention, which is properly considered in habeas corpus proceedings. *See Camarena v. Dir., Immigration and Customs Enforcement*, 988 F.3d 1268, 1272 (11th Cir. 2021) *citing Reno v. Am.-Arab Anti-Discrimination Comm.*, 525 U.S. 471 (1999) (only claims that arise from the commencement of removal proceedings, the adjudication of removal cases, or the execution of removal orders are barred by the jurisdiction-stripping clause at 8 U.S.C. § 1252(g)). The Court has jurisdiction to determine whether the respondents violated the Due Process Clause of the United States Constitution when ICE re-detained Ortega Hernandez and decided to continue his detention for more than a year.

Venue is proper in the United States District Court for the Southern District of Florida because Ortega Hernandez is being unlawfully detained at the Broward Transitional Center in Broward County, Florida in the Southern District of Florida. *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-500 (1973).

PARTIES

Petitioner Jose Alfonso Ortega Hernandez is detained at the Broward Transitional Center in Pompano Beach, Florida. He challenges the legality of his continued and prolonged detention which has exceeded one year.

Respondent Juan Agudelo is the Director of the Broward Transitional Center at which the petitioner is detained. He is responsible for the day-to-day confinement of the petitioner. Respondent Garrett Ripa is the Field Office Director for the Miami Field Office of the U.S. Department of Homeland Security, Immigration and Customs Enforcement. He is responsible for the administration of ICE activities and the detention of noncitizens within the Miami Field Office's area of responsibility, which includes the Broward Transitional Center. Respondent Todd M. Lyons is the Acting Director of ICE. He is responsible for the execution of the immigration detention and removal programs of the United States and has supervisory authority over the petitioner's detention at the Broward Transitional Center. Respondent Kristi Noem is the Secretary of the U.S. Department of Homeland Security. She is responsible for the administration and enforcement of the immigration laws and oversees the components of DHS, including ICE. She has ultimate authority over the petitioner's custody. Respondent Pamela Bondi is the Attorney General of the United States. She is the principal law enforcement officer of the United States. She is responsible for the administration of the Executive Office of Immigration Review and the Board of Immigration Appeals. She has ultimate authority over the processing of the immigration appeal leading to the prolonged detention of the petitioner.

FACTUAL BACKGROUND AND PROCEDURAL HISTORY

Ortega Hernandez is a native and citizen Honduras, who was ordered removed on August 14, 2014. Exhibit A. He did not appeal the removal order, and he was removed from the United

States on September 8, 2014. Exhibits B. Ortega Hernandez illegally reentered the United States with his wife and children. He and his family left Honduras because they were afraid. When he reentered the United States, ICE reinstated his prior removal order and released him under an order of supervision. Exhibits C and D. He was permitted to be at large under certain conditions, including his enrollment and successful participation in an Alternatives to Detention program that required him to wear an electronic monitor. For almost three years, Ortega Hernandez complied with all conditions of his release and performed as required by ICE. He never violated any condition.

Notwithstanding his compliance with the conditions of supervision, on January 26, 2025, ICE redetained him at his home. Exhibit E. After he was detained, he immediately filed a motion for a stay of removal and a motion to reopen removal proceedings. Both were denied on January 30, 2025. Exhibit F.

Because Ortega Hernandez expressed his fear of returning to Honduras, an asylum officer interviewed him. The asylum officer concluded that he had a reasonable fear of persecution or torture and issued a Notice of Referral to an immigration judge for withholding-only proceedings in accordance with 8 C.F.R. § 208.31(e). Exhibit G. Although his wife and children were granted asylum for the same reason that Ortega Hernandez was afraid to return to Honduras, the immigration judge denied Ortega Hernandez's application for withholding of removal on July 7, 2025. Exhibits H and I. Ortega Hernandez appealed the denial decision to the Board of Immigration Appeals on July 8, 2025. The appeal is still pending seven months later. Exhibit J.

While the appeal has been pending, the respondents have refused to release Ortega Hernandez. They have, however, provided him with several undated notices advising him of different actions and decisions they have taken. For example, he was given a Notice to Alien of

File Custody Review, advising him that ICE would review his case for consideration of release on an order of supervision on or about April 11, 2025. Exhibit K. He was also given Notices to Alien of Interview for Review of Custody Status, advising him of an interview on May 16, 2025, and again on July 10, 2025, to discuss whether or not he would be recommended for release. Exhibit L. The paperwork he has been provided is confusing, but ICE has issued at least two decisions to continue detention. Exhibit M. In one decision, he was advised that his “removal in the future is very likely,” that he posed “a significant risk of flight if released,” and that there were no other urgent humanitarian, medical or custodial issues present in this case.” Another decision signed on August 25, 2025, advised Ortega Hernandez that ICE was unable to move forward with his removal because of the pending appeal and ICE’s resulting inability to “conclude that the factors set forth at 8 C.F.R. § 241.4(e) have been satisfied.” The respondents have taken no other actions to release or remove the petitioner.

ARGUMENT

Ortega Hernandez has been in the respondent’s custody for more than a year. His ongoing detention is unconstitutional and in violation of 8 U.S.C. § 1231. He is subject to a final removal order which was reinstated on March 8, 2022. He has not been removed, and his removal is not likely to occur in the reasonably foreseeable future. The respondents have a constitutional responsibility and statutory obligation to release Ortega Hernandez under supervision, even though the appeal of the decision in his withholding-only proceedings remains pending.

Congress directed the removal of noncitizens “ordered removed...within a period of 90 days.” 8 U.S.C. § 1231(a)(1)(A). The 90-day post-removal period begins on the date the removal order becomes administratively final, the date of the final order of any court that entered a stay of removal, or the date the noncitizen is released from nonimmigration detention or confinement. 8

U.S.C. § 1231(a)(1)(B). During the post-removal period, the noncitizen shall be detained. 8 U.S.C. § 1231(a)(2). Noncitizens can be detained longer than the statutory post-removal period, but their detention is limited to a period reasonably necessary to bring about their removal from the United States. *Zadvydas v. Davis*, 533 U.S. 678 (2001).

The Fifth Amendment of the United States Constitution forbids the government from depriving a person of liberty without due process of law. The most significant liberty interest there is being free from imprisonment. *Zadvydas* at 690, citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992) (“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.”). The Due Process Clause applies to all persons in the United States, including noncitizens, “whether their presence here is lawful, unlawful, temporary or permanent.” See *Zadvydas* at 693. “Government detention violates [the Due Process Clause] unless the detention is ordered in a *criminal* proceeding with adequate procedural protections... or, in certain special and ‘narrow’ nonpunitive ‘circumstances,’... where a special justification, such as harm-threatening mental illness, outweighs the ‘individual’s constitutionally protected interest in avoiding physical restraint.’” *Id.*, at 690, citing *United States v. Salerno*, 481 U.S. 739, 746 (1987) and *Kansas v. Hendricks*, 521 U.S. 346, 356 (1997).

The government cannot detain a removable noncitizen indefinitely. *Zadvydas, supra*; *Clark v. Martinez*, 543 U.S. 371, 384 (2005). “Once removal is no longer reasonably foreseeable, continued detention is no longer authorized.” *Id.* at 699. The Supreme Court concluded that six months is a reasonable amount of time to remove a person from the United States. *Id.* If the noncitizen is not removed within the removal period, he shall be subject to supervision. 8 U.S.C. § 1231(a)(3).

The limitation on post-removal-period detention also applies to specially identified noncitizens identified in 8 U.S.C. § 1231(a)(6) who are inadmissible, removable under sections of the INA not applicable here, or who have been determined to be a risk to the community or unlikely to comply with the removal order. Even in those cases, the Supreme Court construed 8 U.S.C. § 1231(a)(6) to require a noncitizen's post-removal period detention to be limited to a period reasonably necessary to bring about the noncitizen's removal from the United States. *See Johnson v. Arteaga-Martinez*, 596 U.S. 573, 574 (2022). Ortega Hernandez is inadmissible; but he still has a constitutional right to due process.

When a noncitizen like Ortega Hernandez illegally reenters the United States after being previously removed, the prior removal order is reinstated from its original date, and he may be removed at any time after the reentry. 8 U.S.C. § 1231(a)(5). The reinstated removal order is not subject to being reopened or reviewed and the noncitizen cannot apply for any relief from the order. *Id.* Thus, it is a final removal order. However, the noncitizen may seek protection from removal to a country where his life or freedom would be threatened because of his race, religion, nationality, membership in a particular social group, or political opinion. 8 U.S.C. § 1231(b)(3).

If the noncitizen expresses fear of returning to the country of removal, an asylum officer will determine whether or not his fear is reasonable. 8 C.F.R. §§ 208.31(b), 1208.31(b). If the asylum officer concludes that the noncitizen has a reasonable fear, the matter is referred to an immigration judge for initiation of a withholding-only proceeding. 8 C.F.R. §§ 208.31(e), 1208.31(e). The immigration judge's final decision about the withholding application can be appealed to the BIA. 8 C.F.R. §§ 208.31(e), 1208.31(e). But withholding-only proceedings are only relevant to determine to where a noncitizen will be removed, not whether he will be removed

at all. *Johnson v. Guzman Chavez*, 594 U.S. 523, 543 (2021). Thus, withholding-only proceedings do not impact the finality of the removal order. *Id.* at 539.

The post-removal detention period applies to noncitizens in withholding-only proceedings. *Id.* at 546. It does not matter that withholding-only proceedings may take longer than the statutory detention period or the presumptive detention period. *Id.* at 546-547. Title 8 U.S.C. § 1231(a)(3) is clear—in the event that a noncitizen cannot be removed within the 90-day removal period, he shall be subject to supervision under the regulations. *Id.*

Ortega Hernandez has been detained in post-removal detention far longer than the 6-month period recognized by the Supreme Court. The fact that he claimed fear of return to Honduras—the same fear that resulted in his wife and children being granted asylum—does not diminish his constitutional right to be released from detention. The respondents cannot detain him indefinitely. Ortega Hernandez has demonstrated by his three-year compliance with the ICE order of supervision that he is not a risk to the community, nor is he unlikely to comply with the removal order. And the respondents themselves have demonstrated that Ortega Hernandez is worthy of release on supervision. They released him before and he followed their rules.

He did not violate the terms of his supervision, but on January 26, 2025, he was redetained and taken back into custody purportedly to enforce the removal order. After he expressed fear of returning to Honduras, an immigration in withholding-only proceedings found that his fear was not reasonable—in contrast to a conflicting decision that his wife and children warranted asylum based on the same claim. Ortega Hernandez appealed. The appeal has been pending since July 8, 2025, with no end in sight. Meanwhile, he has been unlawfully and unconstitutionally detained for more than a year, despite the fact that he has demonstrated that he will comply with conditions of supervision.

The respondents have stated their intention to continue to detain Ortega Hernandez as long as the appeal from the withholding-only proceeding is pending and they have claimed to be unable to determine “that the factors set forth at 8 C.F.R. § 241.4(e) have been satisfied.” Exhibit M. That section sets forth the criteria for release as follow: 1) travel documents are not available or immediate removal, while proper, is not practicable or in the public interest, 2) the detainee is presently a nonviolent person, 3) the detainee is likely to remain nonviolent, 4) the detainee is not likely to pose a threat to the community following release, 5) the detainee is not likely to violate the conditions of release, and 6) the detainee does not pose a significant flight risk. 8 C.F.R. § 241(e). The respondents did not give the reason for their inability to conclude that Ortega Hernandez does not presently meet the criteria for release.

In the past, however, they did decide that Ortega Hernandez met the criteria for release, and they released him. There has been no significant change since their original decision. Fundamentally, the only change is that he has claimed to be afraid of returning to Honduras and was placed in withholding-only proceedings as a result. The Supreme Court has found that pending withholding-only proceedings do not provide a reason to detain a person in violation of the Constitution. *See Guzman Chavez, supra*.

CONCLUSION

Ortega Hernandez ’s removal order is final. He has been unlawfully and unconstitutionally detained for more than one year, which is far longer than the statutory or presumptive post-removal period. His detention is unconstitutional. The respondents cannot detain him indefinitely. Absent immediate judicial intervention, however, Ortega Hernandez faces continued indefinite detention by the respondents.

PRAYER FOR RELIEF

The petitioner respectfully requests that this Honorable Court issue a writ of habeas corpus, pursuant to 28 U.S.C. § 2241, directing the respondents to immediately release him from custody.

Dated: February 9, 2026

Respectfully submitted,

s/Monica Michelle Beamer

Fla. Bar No. 042412

Esperanza Immigration, LLC

15476 NW 77 Court

#605

Miami Lakes, FL 33016

(954) 999-8503

MonicaBeamer@yahoo.com

Counsel for the Petitioner

CERTIFICATE OF SERVICE

I hereby certify that I caused a true and correct copy of the **PETITION FOR WRIT OF HABEAS CORPUS** to be served by CM/ECF electronic service and/or United States Mail on the following parties:

1. U.S. Attorney for the Southern District of Florida:

United States Attorney
Civil Division
99 N.E. 4th Street
Miami, FL 33132

2. Pam Bondi

Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530

3. Kristi Noem, Secretary

U.S. Department of Homeland Security:
Office of the General Counsel
245 Murray Lane
S.W. Washington, D.C. 20528

4. Garrett Ripa

Field Office Director - Miami
U.S. Immigration and Customs Enforcement (ICE)
Office of the Principal Legal Advisor
333 S.E. 2nd Avenue
Suite 1900
Miami, FL 33131

5. Juan Agudelo

Director/Warden
Broward Transitional Center
3900 N.W. 79th Avenue
Pompano Beach, FL 33073

I declare under penalty of perjury that the foregoing is true and correct.

Date: February 9, 2026,

Respectfully Submitted,
/s/Monica Michelle Beamer
Monica Michelle Beamer
Attorney for Petitioner