UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

EXHIBIT LIST IN SUPPORT OF HABEAS PETITION

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FILED
2026
U.S. DISTRICT COURT
Clerk
KM
3-26CV0376-G

Exhibit 1 – Detainee Identification and Custody Records

- Copy of detainee identification document
- Documentation confirming current ICE detention
- Notice to Appear (NTA)
- Biometrics / fingerprint documentation

Exhibit 2 – Family Photographs

- Family photographs (2–3 images demonstrating family unity and stability)

Exhibit 3 – Letters of Support

- Letters from friends and community members
- Spousal support letter

Exhibit 4 – Family Relationship Evidence

- Birth certificates of the children
- Identification of the spouse

These exhibits are submitted to demonstrate identity, family ties, community support, and the current circumstances of the Petitioner.

EXHIBIT 1

DETAINEE IDENTIFICATION AND CUSTODY RECORDS

Identification Document

ICE Detention Documentation

Notice to Appear (NTA)

Biometrics / Fingerprint Record

DEPARTMENT OF HOMELAND SECURITY

NOTICE TO APPEAL

...oval proceedings under section 240 of the Immigration and Nationality Act:

...ject ID [redacted] FINS [redacted] File No. [redacted]

In the Matter of DOB:

Respondent: ROBERTO RODRIGUEZ-ARCINIEGAS currently residing at:

[redacted] +1 (214)-283-2913

(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 VENEZUELA and a citizen of VENEZUELA ;
3. You arrived in the United States at or near BROWNSVILLE, TX , on or about August 10, 2023 ;
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:

1100 COMMERCE ST STE 1060 DALLAS TX US 75242

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

on September 11, 2028 (Date) at 01:00 PM (Time) to show why you should not be removed from the United States based on the charge(s) set forth above.

KYLE BRANDEL
Acting/Patrol Agent in Charge

(Signature and Title of Issuing Officer) (Sign in ink)

Date: August 11, 2023 DOMNA, TEXAS

(City and State)

DHS Form I-862 (2/20) Page 1 of 3

DEPARTMENT OF HOMELAND SECURITY

NOTICE TO APPEAR

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

Subject ID: [redacted] FINS [redacted] File No: [redacted]

DOB:

In the Matter of:

Respondent: ROBERTH BOHORQUEZ-ARCINIEGAS currently residing at:

[redacted]

(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 VENEZUELA and a citizen of VENEZUELA ;
3. You arrived in the United States at or near BROWNSVILLE, TX , on or about August 10, 2023 ;
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KYLE BRANDEL
Acting/Patrol Agent in Charge

(Signature and Title of Issuing Officer) (Sign in ink)

Date: August 11, 2023 DONNA, TEXAS

(City and State)

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE

File No.: [redacted]

Name: BOHORQUEZ-ARCINIEGAS, ROBERTH

Date: Aug 12, 2023

You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

- [x] You must report for any hearing or interview as directed by Immigration and Customs Enforcement or the Executive Office for Immigration Review.
- [x] You must surrender for removal from the United States if so ordered.
- [x] You must report in (writing) (person) to Duty officer at Dallas BI Office on September 15, 2023, 09:30 AM as directed.

If you are allowed to report in writing the report must contain your name, alien registration number, current address, place of employment, and other pertinent information as required by the officer listed above.

- [x] You must not change your place of residence without first securing written permission from the officer listed above.
- [x] You must not violate any local, State or Federal laws or ordinances.
- [x] You must assist Immigration and Customs Enforcement in obtaining any necessary travel documents.
- [x] Other: *Your release is contingent upon your enrollment and successful participation in an Alternatives to Detention (ATD) program as designated by the U.S. Department of Homeland Security. As part of the ATD program, you will be subject to electronic monitoring and may be subject to a curfew. Failure to comply with the requirements of the ATD program will result in a redetermination of your release conditions or your arrest and detention.*

  If fitted with a U.S. Immigration and Customs Enforcement GPS tracking ankle bracelet, do not tamper with or remove the device. Under federal law, it is a crime to willfully damage or attempt to damage property of the United States. Damaging or attempting to damage the GPS tracking ankle bracelet or any of its associated equipment (including, but not limited to, the charging station, batteries, power cords, etc.) may result in your arrest, detention, and prosecution under 18 U.S.C. § 1361 and/or 18 U.S.C. § 641, each punishable by a fine, up to ten years imprisonment, or both.
- [x] See attached sheet containing other specified conditions (Continue on separate sheet if required)

NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by Immigration and Customs Enforcement.

Amy Leal-Alvarado, ASDDO
(Name and Title of ICE Official)

Alien's Acknowledgement of Conditions of Release under an Order of Recognizance

I hereby acknowledge that I have (read) (had interpreted and explained to me in the SPANISH language) the contents of this order, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, detention, or prosecution.

Jared Kovacic
0018631551.ICE
8/12/2023, 9:28:17 AM
JARED R KOVACIC
(Signature of ICE Official Serving Order)

(Signature of Alien)

Aug 12, 2023
Date

I hereby cancel this order of release because:

- [ ] The alien failed to comply with the conditions of release.
- [ ] The alien was taken into custody for removal.

(Signature of ICE Official Cancelling Order)

Date

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE (ADDENDUM)

File No. [redacted]

Name: BOHORQUEZ-ARCINIEGAS, ROBERTH

Date: Aug 12, 2023

- [x] That you do not associate with known gang members, criminal associates, or be associated with any such activity.
- [ ] That you register in a substance abuse program within 14 days and provide ICE with written proof of such within 30 days. The proof must include the name, address, duration, and objectives of the program as well as the name of a counselor.
- [ ] That you register in a sexual deviancy counseling program within 14 days and provide ICE with written proof of such within 30 days. You must provide ICE with the name of the program, the address of the program, duration and objectives of the program as well as the name of a counselor.
- [ ] That you register as a sex offender, if applicable, within 7 days of being released, with the appropriate agency(s) and provide ICE with written proof of such within 10 days.
- [x] That you do not commit any crimes while on this Order of Release on Recognizance.
- [x] That you report to any parole or probation officer as required within 5 business days and provide ICE with written verification of the officer's name, address, telephone number, and reporting requirements.
- [ ] That you continue to follow any prescribed doctor's orders whether medical or psychological including taking prescribed medication.
- [x] That you provide ICE with written copies of requests to Embassies or Consulates requesting the issuance of a travel document.
- [x] That you provide ICE with written responses from the Embassy or Consulate regarding your request.
- [x] Any violation of the above conditions will result in revocation of your employment authorization document.
- [x] Any violation of these conditions may result in you being taken into ICE custody and you being criminally prosecuted.
- [ ] Other:

X _____
(Signature of Alien)

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE

File No. [redacted]

Name: HONDURUEZ-ANCINIEGAS, ALBERTO

Date: Aug 12, 2023

You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

- [x] You must report for any hearing or interview as directed by Immigration and Customs Enforcement or the Executive Office for Immigration Review.
- [x] You must surrender for removal from the United States if so ordered.
- [x] You must report in (writing) (person) to Duty officer at Dallas ERO Office on September 15, 2023, [illegible] as directed.

If you are allowed to report in writing, the report must contain your name, alien registration number, current address, place of employment, and other pertinent information as required by the officer listed above.

- [x] You must not change your place of residence without first securing written permission from the officer listed above.
- [x] You must not violate any local, State or Federal laws or ordinances.
- [x] You must assist Immigration and Customs Enforcement in obtaining any necessary travel documents.
- [x] Other: *Your release is contingent upon your enrollment and successful participation in an Alternatives to Detention (ATD) program as designated by the U.S. Department of Homeland Security. As part of the ATD program, you will be subject to electronic monitoring and may be subject to a curfew. Failure to comply with the requirements of the ATD program will result in a redetermination of your release conditions or your arrest and detention.*

  If fitted with a U.S. Immigration and Customs Enforcement GPS tracking ankle bracelet, do not tamper with or remove the device. Under federal law, it is a crime to willfully damage or attempt to damage property of the United States. Damaging or attempting to damage the GPS tracking ankle bracelet or any of its associated equipment (including, but not limited to, the charging station, batteries, power cords, etc.) may result in your arrest, detention, and prosecution under 18 U.S.C. § 1361 and/or 18 U.S.C. § 641, each punishable by a fine, up to ten years imprisonment, or both.
- [x] See attached sheet containing other specified conditions (Continue on separate sheet if required)

NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by Immigration and Customs Enforcement.

Amy Leal-Alvarado, ATDO
(Name and Title of ICE Official)

Alien's Acknowledgement of Conditions of Release under an Order of Recognizance

I hereby acknowledge that I have (read) (had interpreted and explained to me in the SPANISH language) the contents of this order, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, detention, or prosecution.

Jared Kovacic 0018631551.ICE 8/12/2023 9:28:17 AM JARED.KOVACIC
(Signature of ICE Official Serving Order)

(Signature of Alien)

Aug 12, 2023
Date

I hereby cancel this order of release because

- [ ] The alien failed to comply with the conditions of release
- [ ] The alien was taken into custody for removal

(Signature of ICE Official Cancelling Order)

Date

ICE Form I-220A (10/20)

EXHIBIT 2

FAMILY PHOTOGRAPHS

Family Photos

Images Showing Family Unity and Stability

EXHIBIT 3

LETTERS OF SUPPORT

Letters from Friends

Community Support Letters

Spousal Support Letter

Honorable Immigration Judge:

I, Kristina Lasley am writing to you with respect and consideration to speak about Mr Roberth Bohorquez Arciniegas, who is currently in ICE custody.

I personally have known Mr Roberth Bohorquez Arciniegas for two years and I state that his behavior and values that he represents are very well.

Mr. Roberth Bohorquez Arciniegas is a family man who is responsible and hardworking. He and his family form a decent honorable good home.

They do not possess any risk to The Community and in the contrary Mr Roberth Bohorquez Arciniegas and his family are people who are seeking to live in stability and to contribute positively and to build a secure future for their children.

The detention of Mr.Roberth Bohorquez Arciniegas has caused a profound emotional and economic impact on his family who depend on him as a provider and a fundamental figure within the household.

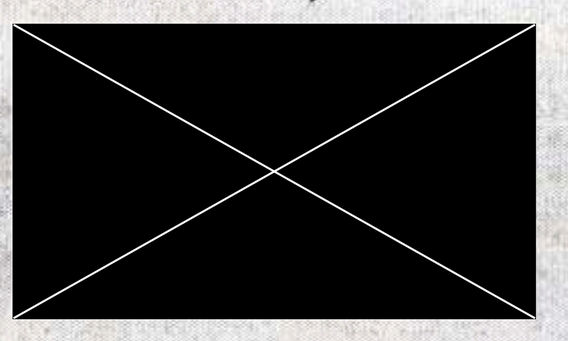
Mr. Roberth Bohorquez Arciniegas' absence has left a void that particularly affects his children who need their father's presence and support.

Returning to Venezuela is not a viable option for Mr. Roberth Bohorquez Arciniegas or his family because of the current political conditions in Venezuela.

I, Kristina Lasley beseech you to please release Mr. Roberth Bohorquez Arciniegas so his family can be complete.

Sincerely

Kristina Lasley



Kristina Lasley

To Whom It May Concern,

My name is Jose Escuadra, and I am the Manager at Don Cuco Meat Market in Garland, Texas. I am writing this letter in support of Roberth A. Bohorquez Arciniegas, who is currently in ICE custody.

Roberth has only worked with us for a few months, but in that time he has shown me that he is someone with genuine character. You can teach people tasks, but you can't teach someone to care, and Roberth cares. He pays attention to the details, takes pride in his work, and treats the business like it matters. He doesn't have to be told what to do; he sees what needs to get done and takes initiative.

He is respectful, humble, and hardworking. When we are busy or short-handed, he steps up without being asked. Employees like that are rare. His absence is felt not just because of the workload, but because of the kind of person he is. He brings stability and positivity to the workplace.

But beyond our business, I know how important he is to the people who love him. Roberth has a wife, family, and friends who depend on him emotionally and financially. They are worried and hurting without him. I am not just asking for him to return to us as an employee, but more importantly, to be returned to his wife, his family, and his friends. They need him far more than we do.

I understand the seriousness of immigration matters, and I am not trying to minimize the process. I am simply speaking as someone who has seen Roberth's character firsthand. He deserves the chance to keep building his life here, to continue working, and to be reunited with his loved ones.

If you have any questions or need to speak with me directly, please feel free to contact me.

Respectfully,

Jose Escuadra
Manager
Don Cuco Meat Market
[redacted]

To whom it may concern,

I, Christian Velazquez, a friend and companion of Sr Roberth A. Bohorquez Arciniegas, can affirm that he is an exceptional individual in every sense of the word. He is respectful, kind, loving and remarkably hard working, always willing to assist wherever help is needed.

I have witnessed on numerous occasions the care and dedication he shows to his wife and daughters, consistently attentive to their needs.

Thank you in advance for your attention. Please feel free to contact me should you require any additional information.

Best Regards,

Christian Velazquez

[redacted]

Christian Velazquez

To whom it may concern,

I, Christian Velazquez, a friend and companion of Sr Roberth A. Bohorquez Arciniegas, can affirm that he is an exceptional individual in every sense of the word. He is respectful, kind, loving and remarkably hard working, always willing to assist wherever help is needed.

I have witnessed on numerous occasions the care and dedication he shows to his wife and daughters, consistently attentive to their needs.

Thank you in advance for your attention. Please feel free to contact me should you require any additional information.

Best Regards,

Christian Velazquez

[redacted]

Christian Velazquez

Good Shepherd Catholic Parish

One Body in Christ † Un Cuerpo en Cristo

December 6, 2025

To whom it may concern:

The peace and joy of the Christ fill your life.

Through this letter I testify that Mr Robert Alexander Bohorquez Arciniegas residing at 4650 Saturn Rd., Garland TX 75041, is a person of good moral behavior.

He is married to Stefhany Lopez and is the father of Amber Krystal Bohorquez, Perla Krystal Bohorquez, and Grisel Stefhany Lopez. I have known this person for two years, and he and his family have attended our parish community. He is a hardworking man dedicated to his family, who wants to succeed alongside them and provide them with a better life.

I provide you with my personal information for any clarification.

Jose Luis Esparza Zavala

[redacted]

I appreciate all the support you can provide to Mr Robert Alexander Bohorquez Arciniegas in this process.

My prayers for you.

R.P. Luis Esparza F.N

R.P. José Luis Esparza Zavala, F.N.
Parochial Vicar

GOOD SHEPHERD CHURCH GARLAND TEXAS

1224 Main Street, Garland, TX 75040 - 6122 • (972) 276-8587 • (972) 494-3653 f • www.gschurch.org

SPOUSAL SUPPORT LETTER

Honorable Judge:

My name is Stefhany López, the lawful wife of Robert Bohorquez-Arcinegas. I respectfully submit this letter to explain the impact my husband's detention has had on our family and to ask the Court to consider his release while his immigration case continues.

My husband is currently detained by immigration authorities while he has an active asylum case pending before the Immigration Court. He is exercising his legal right to seek protection in the United States and wants to continue his case responsibly and in accordance with the law.

We have daughters together who are suffering deeply due to this separation. Their father's absence has caused sadness, anxiety, and emotional distress. They constantly ask for him, struggle emotionally, and miss the daily presence and support of their father, who plays a fundamental role in their emotional stability and development.

In addition to the emotional impact, his detention has created financial hardship for our household. My husband contributed to our family's well-being, and his absence has made it difficult to meet basic responsibilities. However, the greatest harm is the emotional void his absence has created within our family.

Robert is a responsible, loving, and present father. He has always fulfilled his role within our family. He is not a danger to the community and is not a flight risk. He has a stable home, a supportive family, and a firm intention to comply with all legal obligations and attend all court hearings as required.

I respectfully ask the Court to allow him to continue his asylum process while released on bond or under any condition the Court deems appropriate. Our family needs his presence, and he deserves the opportunity to defend his case while remaining with us.

Thank you for your time and consideration.

Respectfully,

Stefhany López

Wife of Robert Bohorquez-Arcinegas

Date: January 29, 2026

SPOUSAL SUPPORT LETTER

Honorable Judge:

My name is Stefhany López, the lawful wife of Robert Bohorquez-Arcinegas. I respectfully submit this letter to explain the impact my husband's detention has had on our family and to ask the Court to consider his release while his immigration case continues.

My husband is currently detained by immigration authorities while he has an active asylum case pending before the Immigration Court. He is exercising his legal right to seek protection in the United States and wants to continue his case responsibly and in accordance with the law.

We have daughters together who are suffering deeply due to this separation. Their father's absence has caused sadness, anxiety, and emotional distress. They constantly ask for him, struggle emotionally, and miss the daily presence and support of their father, who plays a fundamental role in their emotional stability and development.

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I respectfully ask the Court to allow him to continue his asylum process while released on bond or under any condition the Court deems appropriate. Our family needs his presence, and he deserves the opportunity to defend his case while remaining with us.

Thank you for your time and consideration.

Respectfully,

Stefhany López

Wife of Robert Bohorquez-Arcinegas

Date: January 29, 2026

EXHIBIT 4

FAMILY RELATIONSHIP EVIDENCE

Children's Birth Certificates

Spouse Identification

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS

GRISEL STEFHANNY LOPEZ DAM,

as Next Friend of ROBERT BOHORQUEZ-ARCINIEGAS,

Petitioner,

v.

FIELD OFFICE DIRECTOR, ICE; WARDEN, EDEN DETENTION CENTER; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT,

Respondents.

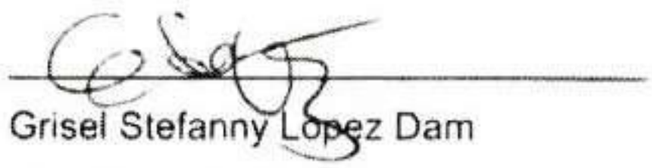
CERTIFICATE OF SERVICE

I, Grisel Stefanny Lopez Dam, certify that on January 29, 2026, I served a true and correct copy of the Petition for Writ of Habeas Corpus, Motion to Proceed In Forma Pauperis, Emergency Motion to Prevent Transfer of Petitioner, and all supporting documents upon the following parties:

- Office of the United States Attorney for the Northern District of Texas
- U.S. Department of Homeland Security (DHS)
- Warden, Eden Detention Center

Service was made by U.S. Mail / certified mail / or other authorized method of delivery.

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



Grisel Stefanny Lopez Dam

Next Friend (Wife)

Date: January 29, 2026

Señor juez Porfa
por nome quites a mi Papá

teAmo PaPá