IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ADALILI MATILDE LOPEZ-MORALES,

Petitioner,

v.

PAMELA BONDI, Attorney General of the United States,
KRISTI NOEM, Secretary of the U.S. Department of Homeland Security
TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement.
Baltimore Field Office
VERNON LIGGINS, Acting Field Office Director
ICE Enforcement and Removal Operations, George H. Fallon Federal Building
31 Hopkins Plaza, 6th Floor
Baltimore, MD 21201

Respondents.

Case No: 1:26-cv-0634

A# [redacted]

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

This is a petition for a writ of habeas corpus filed on behalf of Adalili Matilde Lopez-Morales, a Guatemalan national who has lived and worked in the United States since 2020. On February 16, 2026, at about 7:30 a.m., officers stopped the vehicle in which Petitioner was a passenger by blocking it from the front and rear. Officers asked for identification, ordered Petitioner out of the car, handcuffed her, and detained her without a warrant, without stating any crime, and without providing an explanation.

Petitioner has no criminal history, was engaged in routine work-related travel, and posed no threat. Her prior immigration court case was terminated on May 5, 2022. Despite these facts, Respondents placed Petitioner in custody and continue to detain her in the Baltimore Holding Room.

Petitioner seeks habeas corpus relief from unlawful immigration detention. Respondents detain Petitioner in violation of the Fifth Amendment's due process guarantee, the Eighth Amendment's prohibition on cruel and unusual punishment, and beyond the lawful limits of 8 U.S.C. § 1225(b)(2). Petitioner is subject to 8 U.S.C. § 1226(a), is entitled to a bond hearing, and requests an order declaring continued detention unlawful and directing Respondents to release Petitioner or promptly conduct a custody redetermination hearing.

CUSTODY

1. Petitioner is in physical custody of Respondents Vernon Liggins, Acting Field Office Director, ICE ERO, and is detained at the Baltimore Holding Room, Baltimore, Maryland, a DHS-operated facility.

JURISDICTION

2. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the U.S. Constitution (Suspension Clause). Petitioner is in custody under color of federal authority in violation of the Constitution and laws of the United States. Relief is also available under 28 U.S.C. § 2201 et seq. (Declaratory Judgment Act) and 28 U.S.C. § 1651 (All Writs Act).

VENUE

3. Venue is proper in this District — Petitioner is detained at Baltimore Holding Room within this District and a Respondent with immediate custody is located here.

PARTIES

4. Petitioner (A[redacted] is a native and citizen of Guatemala, currently detained at Baltimore Holding Center, Maryland.

5. Respondent Vernon Liggins is Acting Field Office Director, ICE ERO, Baltimore. He is a legal custodian with authority to release Petitioner.

6. Respondent Kristi Noem is the Secretary of DHS, responsible for detention and removal policies.

7. Respondent Pamela Bondi is the Attorney General of the United States.

8. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

9. Exhaustion is excused as futile. On July 8, 2025, Acting ICE Director Todd Lyons issued a memorandum mandating detention under § 1225 for all unadmitted noncitizens. This policy was reinforced by Matter of Yajure-Hurtado, 29 I&N Dec. 216 (BIA 2025), which foreclosed bond relief in immigration court. Because EOIR proceedings offer no adequate remedy, Petitioner's only recourse is this judicial action. *See Shalala v. Ill. Council on Long Term Care*, 529 U.S. 1, 13 (2000).

STATUTORY FRAMEWORK

10. Yajure-Hurtado upended thirty years of interpretation by applying § 1225(b)(2)'s mandatory detention to all unadmitted noncitizens, regardless of residence or arrest site. This petition challenges that shift.

Relevant Provisions of the Immigration and Nationality Act

11. 8 U.S.C. § 1225 / INA § 235 governs inspection, expedited removal, and referral for removal hearings. Section 1225(a)(1) defines an applicant for admission, "for purposes of this chapter," as a noncitizen present in the United States who has not been admitted or who arrives in the United States.

12. 8 U.S.C. § 1225(b)(1) subjects to expedited removal arriving aliens and those who cannot establish two years of physical presence in the United States. 8 U.S.C. § 1225(b)(1)(A)(i), (iii).

13. 8 U.S.C. § 1225(b)(2)(A) mandates DHS custody for applicants for admission not clearly entitled to be admitted, pending non-expedited § 1229A removal proceedings. Section 1225(b)(2) applies to arriving aliens and certain individuals stopped shortly after entry.

14. 8 U.S.C. § 1226(a) (INA § 236(a)) authorizes the Attorney General to arrest and detain noncitizens pending removal, subject to discretionary bond. In enacting IIRIRA, Congress intended § 1226 to "restate" existing provisions for the detention and bond release of noncitizens not lawfully present. H.R. Rep. No. 104-469, pt. 1, at 229.

15. 8 U.S.C. § 1226(c) creates mandatory detention for criminal and terrorist noncitizens. The Laken Riley Act added § 1226(c)(1)(E), requiring detention of noncitizens arrested, charged, or convicted of certain crimes who are also inadmissible.

16. 8 U.S.C. § 1357(a) permits warrantless arrest where an officer sees entry in violation of law, has reason to believe the noncitizen is unlawfully present and likely to escape, or has reason to believe a felony was committed. The BIA equates the "reason to believe" standard with probable cause. Matter of Mariscal-Aguilar, 28 I&N Dec. 666 (BIA 2022).

Longstanding Interpretation of §§ 1225 and 1226

17. Since 1996, courts and the BIA have consistently applied § 1225(b) only to border encounters, while § 1226(a) serves as the "default rule" and "catch-all" for those in the interior. *Jennings v. Rodriguez*, 583 U.S. 281, 301 (2018). Under Loper Bright, this Court may consult such longstanding agency practice as evidence of statutory meaning. 603 U.S. at 386.

18. Thuraissigiam acknowledged that DHS's historical practice limited § 1225 "applicants for admission" to those caught within 100 miles and 14 days of entry. 591 U.S. 121, 134 n.2 (2020). This definition is tied specifically to expedited removal. Id. at 124.

19. Matter of Akhmedov (2025) confirms § 1226(a) bond jurisdiction for interior arrests, while Matter of Q. Li (2025) restricts § 1225(b) to border-proximate expedited removals. 29 I&N Dec. 166; 29 I&N Dec. 66.

Matter of Yajure-Hurtado and DHS Policy

20. DHS's July 2025 policy alert introduced a novel interpretation of § 1225(b)(2) requiring mandatory detention. Per Matter of Yajure-Hurtado, this now denies bond hearings to all who entered without inspection, effectively ending judicial bond jurisdiction for long-term residents.

21. This Court is not bound by the BIA's interpretation, which Respondents use to subject Petitioner to mandatory, indefinite detention without individualized review.

Post-Chevron Independent Statutory Interpretation

22. Following Loper Bright, this Court must exercise independent judgment, rather than deference, to determine whether § 1225(b)(2) or § 1226(a) applies here.

STATEMENT OF FACTS

23. On February 16, 2026, at about 7:30 a.m., Adalili Matilde Lopez-Morales was a passenger in a car traveling to Salisbury, Maryland. The purpose of the trip was to pick up tortillas for resale. Without warning, one vehicle stopped in front of the car and another stopped behind it, blocking any movement. Several officers exited the vehicles and approached. They asked Ms. Lopez-Morales for identification. The officers did not explain the reason for the stop or identify any traffic violation or crime.

24. After asking for identification, the officers ordered Ms. Lopez-Morales and the other occupants out of the car. The officers then placed Ms. Lopez-Morales in handcuffs. She was detained at the scene. The officers did not present a warrant, did not state that she was under arrest for any criminal offense, and did not provide any explanation for the detention. There is no record that the officers advised her of any rights or gave her a chance to leave.

25. Ms. Lopez-Morales was taken into immigration custody that same day. She was placed in the Baltimore Holding Room. She has remained detained there since February 16, 2026. She has no criminal history. Her prior immigration court case was terminated on May 5, 2022. Despite the lack of criminal charges and the prior termination of her case, she has continued to be held in custody.

26. Ms. Lopez-Morales was born on [redacted] in Guatemala. She entered the United States on January 16, 2020, when she was sixteen years old. Since entering the country, she has lived and worked in the community without any arrests or criminal charges. She has had prior contact with the Department of Homeland Security, but no active immigration case at the time of her detention.

27. Ms. Lopez-Morales is a high school graduate. She graduated from Georgetown High School in 2024. She works as a store clerk five days a week. She supports herself through lawful employment and has established steady work habits. She has family and community ties in the area and is known to family members as reliable and responsible.

CLAIMS FOR RELIEF

COUNT ONE

VIOLATION OF FIFTH AMENDMENT RIGHT TO SUBSTANTIVE AND PROCEDURAL DUE PROCESS

28. Petitioner incorporates by reference all preceding paragraphs.

Substantive Due Process

29. Petitioner's detention under § 1225(b)(2) violates her substantive due process rights under the Fifth Amendment. "Government detention violates [due process] 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 . . . outweighs the individual's constitutionally protected interest in avoiding physical restraint." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

30. Respondents cannot establish a special justification for denying Petitioner's liberty. Under Matter of Yajure-Hurtado, the BIA purports to strip immigration judges of bond jurisdiction for all who entered without inspection, subjecting Petitioner to mandatory detention. 29 I&N Dec. at 228.

31. As a civil immigration detainee with no criminal history, Petitioner possesses a 'historic liberty interest' in freedom from bodily restraint and the right to basic human needs. *Youngberg v. Romeo*, 457 U.S. 307, 315–16 (1982). The Fourth Circuit mandates that for individuals in non-punitive government custody, the Due Process Clause requires—at a minimum—adequate food, shelter, clothing, and medical care. *Patten v. Nichols*, 274 F.3d 829, 837 (4th Cir. 2001). Because Petitioner's detention is civil rather than criminal, and she has maintained a record of lawful employment and community ties, any restraint on her liberty must be strictly 'tailored' to a compelling non-punitive justification. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Absent such justification, her continued confinement in the Baltimore Holding Room constitutes an unconstitutional 'punishment' without trial. *Id.* Immediate relief is necessary to prevent prolonged unlawful detention.

Procedural Due Process Requires Release Pending Bond Hearing

32. Even if Respondents stipulate that Petitioner is detained under 8 U.S.C. § 1226(a) and thus entitled to a bond hearing, procedural due process requires that Petitioner be released pending that hearing. The question is not merely whether a hearing will be held, but what kind of hearing satisfies constitutional minimums. Under current conditions, requiring Petitioner to remain in custody while awaiting a bond hearing violates the Fifth Amendment's procedural due process guarantee.

33. Bond hearings in immigration court have been systematically compromised through institutional manipulation. The attached affidavit of Lawrence O. Burman, a retired Immigration Judge with twenty-seven years on the bench, provides direct evidence of this breakdown. Judge Burman attests that since January 2026, Immigration Judges Raphael Choi and Karen Donoso-Stevens—who had presided over detained dockets in Northern Virginia since 2017—were "abruptly removed from the detained docket in January 2026, in the middle of their morning dockets, and were replaced by newly-appointed judges." Burman Aff. ¶ 17. Judge Burman further attests that judges have been "terminated without explanation or notice" and that "judges were removed for their strong commitment to due process." Id. ¶¶ 18-19. He observes "increasing concern among members of the bench about institutional intimidation and the perception that decisions unfavorable to the government could negatively affect judicial tenure." Id. ¶ 20.

34. The practical effect has been a surge in bond denials and prohibitively high bonds. Judge Burman notes that "bonds in excess of $15,000 were relatively uncommon" during his tenure because "a person's ability to pay a bond should be

considered when adjudicating a bond request." Id. ¶ 14. Anecdotal reports from the Maryland immigration bar now indicate bond amounts averaging $25,000—a level working families cannot meet. Setting bond at an amount the government knows a detainee cannot pay is not an exercise of discretion; it is a de facto denial of release. *See Hernandez v. Sessions*, 872 F.3d 976, 989-90 (9th Cir. 2017) (holding that failure to consider ability to pay transforms bond into indefinite detention).

35. Judge Burman further attests that during his years on the bench, "it was extremely rare to see a bond denial based on flight risk where the alien had a fixed address, a job, a proposed application for relief, or family ties to the United States." Burman Aff. ¶ 13. He confirms that "bond was not denied solely due to a person's manner of entry into the United States or because they had not yet applied for relief before being encountered by immigration officials." *Id.* ¶ 12. Yet under current practice, entry without inspection has become a categorical bar to release, replacing individualized assessment with a predetermined outcome.

36. Under Zadvydas, detention is permissible only if "tailored" to its civil purpose. 533 U.S. at 690. A categorical bar based on entry status is, by definition, not tailored to Petitioner's individual risk profile. In *Dubon Miranda v. Barr*, 403 F. Supp. 3d 442, 449 (D. Md. 2019), this Court held that due process is violated when the government relies on "boilerplate" rationales rather than "meaningful" individualized hearings. Similarly, in *Portillo v. Hott*, 322 F. Supp. 3d 698, 704 (E.D. Va. 2018), the court held the government must provide a "constitutionally adequate" hearing where the IJ actually weighs evidence rather than relying on the "mere fact of removal proceedings" as automatic proof of flight risk.

37. While Respondents may point to an upcoming bond hearing as a sufficient remedy, the Fifth Amendment requires that such an opportunity be granted at a 'meaningful time and in a meaningful manner.' *Armstrong v. Manzo*, 380 U.S. 545, 552 (1965). As the Third Circuit observed, when the government relies on static entry factors and categorical assumptions to deny liberty, the detention becomes 'punitive' rather than regulatory. *Chavez-Alvarez v. Warden York Cty. Prison*, 783 F.3d 468, 478 (3d Cir. 2015). Here, the available process is a procedural façade; evidence from retired Immigration Judge Lawrence Burman reveals a system of 'institutional intimidation' where judges are removed for prioritizing due process and bonds are set at prohibitively high amounts—averaging $25,000 —that function as de facto detention orders. Because this 'compromised' process cannot be trusted to produce a fair result, requiring Petitioner to remain in custody pending its outcome replaces a 'meaningful opportunity' with an administrative end-run around constitutional requirements. *See Pensamiento v. McDonald*, 315 F. Supp. 3d 684, 694 (D. Mass. 2018); *see also Dubon Miranda v. Barr*, 403 F. Supp. 3d 442, 449 (D. Md. 2019) (rejecting 'boilerplate' rationales in place of meaningful hearings).

38. When the bond process is systematically undermined and the outcome predetermined, requiring a detainee to remain in custody pending that hearing compounds the constitutional violation. Federal courts have recognized that pretrial detention pending a hearing violates due process when the hearing itself cannot be trusted to produce a fair result. The remedy is not to hold the hearing while the person remains detained, but to release the person pending a hearing conducted under constitutional conditions.

39. Federal criminal pretrial detention jurisprudence supports release pending detention hearings, though with an important distinction that strengthens rather than weakens this case. Under the Bail Reform Act, 18 U.S.C. § 3142, defendants are presumptively released pending detention hearings, and the government bears the burden of proving by clear and convincing evidence that no conditions will reasonably assure appearance and safety. The hearing occurs while the defendant is at liberty—not while incarcerated. Only after the government proves its case at a full hearing with procedural safeguards may detention be imposed. *See United States v. Salerno*, 481 U.S. 739, 751 (1987). In the immigration context, the burden is reversed: under *Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006), the noncitizen must prove she is not a flight risk or danger. This burden allocation makes pre-hearing release constitutionally imperative rather than merely advisable.

40. When the immigrant bears the burden of proof, detention pending the hearing becomes fundamentally unfair and undermines the very hearing process it purports to protect. Petitioner must prove she is not a flight risk, yet detention itself severs the community ties she needs to demonstrate. She must prove employment stability, but cannot obtain current employment verification letters while detained. She must prove family connections, but cannot have family members visit counsel's office to provide affidavits. She must prove a fixed address, but detention makes maintaining housing impossible. She must prove good moral character through community references, but cannot coordinate with those references while confined. Requiring Petitioner to meet her burden while simultaneously preventing her from gathering the evidence necessary to meet that burden violates due process. Under the Fifth Amendment, the 'fundamental

requirement of due process is the opportunity to be heard... at a meaningful time and in a meaningful manner.' *Armstrong*, 380 U.S. at 552. For Petitioner, a hearing while in custody is not a 'meaningful' opportunity; rather, it is a procedural facade. Because the noncitizen bears the burden of proving she is not a flight risk or danger under *Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006), the government's continued detention of Petitioner—which severs her community ties and prevents her from gathering employment records and character references—simultaneously demands evidence and ensures its unavailability. As this Court has noted, the government may not rely on 'boilerplate' processes to satisfy the constitution; it must provide a hearing where the Petitioner can actually participate and prepare. *See Dubon Miranda v. Barr*, 403 F. Supp. 3d 442, 449 (D. Md. 2019). Anything less transforms the upcoming bond hearing into an administrative end-run around constitutional requirements..

41. Pre-bond hearing release has been successfully implemented in the Eastern District of Virginia. In Gonzalez v. Bondi, No. 1:26-cv-00039 (E.D. Va.), Corado v. Noem, No. 1:26-cv-00068 (E.D. Va.), Hernandez v. Noem, No. 1:26-cv-00156 (E.D. Va.), Sharify v. Hott, No. 1:26-cv-00216 (E.D. Va.), and Vivas Gonzalez v. Lyons, No. 1:26-cv-00257 (E.D. Va.), among many others, judges in this district have ordered immigration detainees released on conditions of supervision pending their bond hearings. This practice has proven workable, cost-effective, and consistent with due process. Petitioners have appeared for their hearings, no public safety incidents have occurred, and the government's legitimate interests have been protected through conditions of release.

42. Releasing Petitioner pending her bond hearing serves multiple important interests. First, it reduces unnecessary detention costs. ICE detention averages $187 per person per day. Detaining Petitioner for even two weeks pending a bond hearing costs taxpayers over $2,000, while release on an order of supervision costs virtually nothing. When Petitioner poses no flight risk or danger—she has a fixed address, lawful employment, family ties, and no criminal history—continued detention wastes public resources.

43. Second, release enables meaningful preparation for the bond hearing itself. Detained individuals cannot easily gather employment verification letters, obtain character references, secure ties letters from family members, or meet with counsel to prepare evidence. Petitioner works as a store clerk five days a week and has family in the community, but gathering documentation of these ties while detained is extremely difficult. Requiring her to prepare for a hearing that will assess her ties to the community while simultaneously severing those ties through detention is fundamentally unfair.

44. Third, the government loses nothing from pre-hearing release. If the government believes Petitioner is a flight risk or danger, it will have the opportunity to prove that at the bond hearing. Release pending the hearing is subject to conditions—electronic monitoring, regular check-ins, travel restrictions, whatever the Court deems appropriate. If the Immigration Judge ultimately finds Petitioner should remain detained, she can be returned to custody. But if the process is rigged from the start, requiring detention pending that process violates due process.

45. The government cannot meet its burden under the Fifth Amendment to justify continued detention pending a bond hearing when: (1) the hearing process has been systematically compromised through judge removal and institutional pressure; (2) Petitioner has no criminal history, stable employment, and strong community ties; (3) pre-hearing release has proven successful in this district; and (4) release serves efficiency, preparation, and constitutional values while detention serves no legitimate purpose. Ordering another bond hearing without releasing Petitioner pending that hearing allows the government to claim technical compliance while perpetuating an unconstitutional detention. The remedy must match the violation: immediate release pending a bond hearing conducted under constitutionally adequate conditions.

COUNT TWO

VIOLATION OF EIGHTH AMENDMENT RIGHT TO PROTECTION FROM CRUEL AND UNUSUAL PUNISHMENT

33. Petitioner incorporates all preceding paragraphs by reference.

34. The government's conduct amounts to cruel and unusual punishment because the detention functions as punishment rather than a civil measure and is grossly disproportionate to Petitioner's peaceful conduct. Officers blocked the vehicle, removed Petitioner, handcuffed her, and detained her without a warrant, stated offense, or explanation. She has no criminal history, and her prior immigration case was terminated years earlier, yet the government placed her in custody and continues to confine her in the Baltimore Holding Room. Petitioner was engaged in routine, work-related travel, posed no threat, and did not resist. Despite this, the government imposed the most severe restraint available. The level of force and continued confinement far

exceed any legitimate civil purpose and impose needless hardship, rendering the detention punitive, excessive, and unconstitutional.

35. This relentless mental and emotional pain, coupled with the indefinite nature of Petitioner's confinement, heightens the cruelty of the detention and underscores the punishment's unusual severity.

36. The Eighth Amendment prohibits the government from inflicting cruel and unusual punishment. *See Estelle v. Gamble*, 429 U.S. 97, 106 (1976). Even absent completed harm, the lack of safety in detention conditions is sufficient for judicial intervention. *See Helling v. McKinney*, 509 U.S. 25, 33 (1993).

37. Petitioner's mandatory, indefinite detention based solely on Respondents' erroneous interpretation of § 1225(b)(2) constitutes cruel and unusual punishment.

38. Detainees may challenge unconstitutional conditions of confinement through habeas corpus. *See Preiser v. Rodriguez*, 411 U.S. 475, 499–500 (1973). Respondents' continued custody has transformed civil immigration detention into cruel and unusual punishment.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

A. Assume jurisdiction over this matter;

B. Issue an order directing Respondents to Show Cause why the Writ should not be granted;

C. Enjoin Respondents from transferring Petitioner outside this District or the United States during this action or in a manner that would strip this Court's jurisdiction;

D. Declare that Petitioner is detained under 8 U.S.C. § 1226(a), not 8 U.S.C. § 1225(b)(2);

E. Order Petitioner's immediate release on an Order of Supervision or other reasonable conditions pending her bond hearing, including but not limited to: (1) regular reporting to ICE; (2) electronic monitoring if deemed necessary; (3) surrender of travel documents; (4) geographic restrictions; and (5) any other conditions this Court deems appropriate to ensure appearance;

F. Order Respondents to provide Petitioner a bond hearing before an Immigration Judge within ten (10) days of release, with the following procedural safeguards:

(1) The government shall bear the burden of proving by clear and convincing evidence that Petitioner is a flight risk or danger to the community;

(2) Petitioner shall have the right to present evidence, call witnesses, and testify on her own behalf;

(3) The Immigration Judge shall consider Petitioner's ability to pay any bond amount set;

(4) The Immigration Judge shall issue written findings of fact and conclusions of law explaining the basis for any detention or bond determination;

(5) Any government appeal shall not automatically stay Petitioner's release; and

(6) The hearing shall be conducted by an Immigration Judge free from institutional pressure or predetermined outcomes;

G. In the alternative, if the Court declines to order pre-hearing release, order Petitioner's immediate release on reasonable conditions if a constitutionally adequate bond hearing is not held within seven (7) days;

H. Grant any other relief this Court deems just and proper.

DATED: February 16, 2026

Respectfully submitted,
Petitioner

By: _____/s/ _____
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CERTIFICATION PURSUANT TO LOCAL STANDING ORDER 2025-01

I, the undersigned, hereby certify pursuant to Fed. R. Civ. P. 11, as follows: (1) I understand the Petitioner to be presently detained in Maryland, based on the fact that Petitioner was arrested by ICE in Maryland two days ago and the fact that Petitioner recently called a friend/family member from the ICE Baltimore Hold Room to inform him he was there; (2) emergency relief is necessary, because Petitioner is at risk of unlawful removal from the United States; and (3) this Court has subject-matter jurisdiction over the Petitioner pursuant to 28 U.S.C. § 2241, and no jurisdiction-stripping statute applies to prevent habeas corpus review of detention and unlawful removal.

DATED: February 16, 2026

Respectfully submitted,
Petitioner

By: _____/s/ _____
Jorge E. Artieda, Esq.
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VERIFICATION PURSUANT TO 28 U.S.C. § 2242I

represent Petitioner and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: February 16, 2026

__ _____/s/ _____
Jorge E. Artieda

Counsel for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2026, I served a true and correct copy of the foregoing Petition on Respondents by USPS Certified Mail, Signature Required, to:

The Honorable Kristi Noem
Secretary of Homeland Security
U.S. Department of Homeland Security
Office of the Executive Secretary
Mail Stop 0525
Washington, DC 20528

The Honorable Pamela Bondi
Attorney General of the United States
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/s/

Jorge E. Artieda