

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

GIORGI BERELASHVILI,

Petitioner,

v.

JAMAL L. JAMISON, Warden of Philadelphia
Federal Detention Center; JOHN RIFE, Field Office
Director of Enforcement and Removal Operations,
Philadelphia Field Office, Immigration and Customs
Enforcement;

Respondents.

PETITIONER'S STATUS REPORT

Case No. 2:26-cv-1472

PETITIONER'S STATUS REPORT

Petitioner, Giorgi Berelashvili, through undersigned counsel, respectfully submits the instant status report. This Court previously ordered a bond hearing by March 27, 2026, in accordance with 8 U.S.C. § 1226(a), and to alternatively order Petitioner's immediate release if such a hearing was not conducted by that date. *See* Order, Dkt. 5. A bond hearing was conducted on March 26, 2026.

For the reasons set forth below, that hearing did not comply with constitutional or statutory requirements, and Petitioner respectfully requests that this Court order his immediate release, or in the alternative, order a new bond hearing for this Court to conduct that comports with due process.

I. The Bond Hearing Was Constitutionally Inadequate

The hearing lasted approximately ten minutes. Petitioner's counsel argued all of the factors under *Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006), and addressed ICE's immigration concerns regarding flight risk. Despite this presentation, the Immigration Judge issued a cursory

denial finding both danger and flight risk, without any meaningful analysis of the *Guerra* factors or individualized assessment of Petitioner's circumstances, despite Petitioner providing nearly 150 pages of evidence in support of his bond request. *See* Exh. A.

At the outset of the hearing, undersigned counsel requested an opportunity to present Petitioner to testify in his own defense. The Immigration Judge requested an explanation of what Petitioner was expected to testify to, and undersigned counsel explained that there were two major issues he wanted to address.

First, the Government filed Form I-213 – Record of Deportable/Inadmissible Alien on March 26, 2026, at 3:24 p.m., prior to the scheduled bond hearing on March 27, 2026, at 8:30 a.m. *See* Exh. B. This is significant, because it provided an explanation *for the first time*, as to why Petitioner was detained. The I-213 alleged that Petitioner had failed to show up for a ICE check-in on December 24, 2024 – which was why he was the target of an investigation. The Immigration Judge agreed to permit testimony as to this issue.

Second, counsel requested that Petitioner be allowed to testify as to the basis of his asylum claim, generally. This is in Petitioner's interest, because Immigration Judges have been *heavily* weighing the overall likelihood of success of the underlying relief applications filed by bond applicants when assessing bond. Despite Petitioner filing a timely application for asylum – the Immigration Judge would not permit Petitioner to testify to the basis of his asylum application.

Petitioner began to testify regarding his ICE check-ins and established that he had appeared for check-ins every three (3) months upon arriving in the United States. He stated that his last check in was approximately 1.5 years before he was detained, and he had not received any notice from ICE that he was required to appear at another check in during that time. Undersigned counsel had not yet completed his line of questioning when he was cut off by the immigration judge – who

had evidently heard enough.

On flight risk, Petitioner provided evidence of his presence in the country for over three (3) years, including proof of assets including Petitioner's vehicle registration, his lease documents, and several other receipts and bills documenting that Petitioner had established a stable life within the United States. Additionally, evidence was presented detailing Petitioner's work history, tax returns, and numerous letters – twelve (12) in total – from Respondent's friends attesting to his character. These letters were all provided by individuals who either have status in the United States as Legal Permanent Residents (LPRs) or United States Citizens (USCs).

Petitioner further provided evidence that President Joseph R. Biden had signed an Executive Order closing all federal departments and agencies on December 24, 2024. *See* Exh. A – Tab S. This evidenced diminished the credibility of the I-213, which already included mistakes including stating that Petitioner had no pending immigration relief applications, in addition to misstating Petitioner's birthday. The government noted that the Executive Order had a carve out stating that heads of executive departments *may* determine that they would remain open. But there was no affirmative evidence provided that established the Philadelphia ICE office was immune to the Executive Order. Finally, Petitioner noted that he was arrested outside of his home in this targeted operation, evidencing the fact that he was not trying to evade immigration authorities.

Ultimately, the Immigration Judge denied bond based upon flight risk – as the Immigration Judge determined that Petitioner had limited ties to the area, discrediting Petitioner's support letters because the individuals all knew Petitioner in Georgia – his home country – despite their legal status in the United States. The Immigration Judge also noted that he determined Petitioner's underlying relief was deficient. This is significant because the Immigration Judge refused to allow Petitioner to testify as to the basis of his asylum claim earlier in the hearing. The Immigration

Judge also questioned Petitioner’s attempt to discredit the alleged missed check in with ICE, and asked where the electronic record of Petitioner’s check in was (a document that the government would have infinitely easier access too), and stated without any supporting basis that ICE offices were not closed pursuant to the Executive Order. The Immigration Judge did not explain why ICE was immune to the Executive Order.

None of this reasoning was placed in the actual order for the Board of Immigration Appeals to sufficiently consider on appeal—it merely detailed “Denied” because “The court finds Respondent is a flight risk.” *See* Dkt. 6 – Attachment 1.

This reasoning is constitutionally deficient for several independent reasons.

II. The IJ Failed to Conduct a Meaningful Analysis Under *Matter of Guerra*

In making a bond determination, the IJ must sufficiently explain the reasoning to permit judicial review. *Garcia v. Hyde*, No. 25-cv-585-JJM-PAS, 2025 WL 3466312, at *1 (D.R.I. Dec. 3, 2025) (providing nonprecedential but instructive reasoning for this Court in the Third Circuit) (citing *Barnica-Lopez v. Garland*, 59 F.4th 520, 530 (1st Cir. 2023)). While the IJ “need not discuss ad nauseam every piece of evidence,” the IJ “may not simply ignore substantial testimonial and documentary proof.” *Barnica-Lopez*, 59 F.4th at 530.

Here, the Immigration Judge conducted a cursory hearing despite a record consisting of over nearly 150 pages of evidence submitted by Petitioner that included a comprehensive evidence matrix for both flight risk and danger, and issued a conclusory denial that did not meaningfully engage with any of the *Guerra* factors—including Petitioner’s fixed address, length of residence, family ties, employment history, and manner of entry. *See Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006) (listing factors IJs may consider in determining whether noncitizens merit release on bond).

The Immigration Judge also did not provide meaningful commentary on Form I-213, and

why it was deemed to be credible. Specifically, the I-213 was contradicted by Petitioner's testimony and an Executive Order. The Immigration Judge provided no insight as to why Form I-213 should be deemed more credible than the evidence presented by Petitioner.

Any review of this decision on appeal will require a remand by the Board of Immigration Appeals for the IJ to reissue a more complete decision, thereby resulting in many more months of unnecessary and unlawful detention.

III. The Hearing Amounted to a Rubberstamp Denial That Violated Due Process

Federal courts have consistently held that due process requires more than perfunctory bond proceedings. “[D]ue process is not satisfied . . . by rubberstamp denials [of bond].” *Chi Thon Ngo v. INS*, 192 F.3d 390, 398 (3d Cir. 1999). “The stakes are high and . . . grudging and perfunctory review is not enough to satisfy the due process right to liberty, even for [noncitizens].” *Id.* That court found that a mere presumption of dangerousness or flight risk, without an individualized current assessment, violates due process. *Id.* at 398–99.

The District of Rhode Island recently confronted analogous circumstances. In *Garcia v. Hyde*, Chief Judge McConnell found that the Immigration Judge's failure to meaningfully engage with the evidence constituted a due process violation warranting immediate release. 2025 WL 3466312, at *11–12 (citing Third Circuit precedent *Chi Thon Ngo*, 192 F.3d at 398). The court specifically noted that it does not “challenge the IJ's discretionary judgment” but rather “whether the IJ provided him with a constitutionally adequate bond hearing.” *Id.* at *5. Like in Petitioner's case, the IJ in *Garcia* issued a denial without meaningfully analyzing the evidence, and the court concluded that this was “an error of law” violating due process. *Id.* at *11 (citing *Chi Thon Ngo*, 192 F.3d at 398).

The *Garcia* court further observed that “in recent months, IJs have faced enormous

pressure from the Executive Branch to dismiss cases quickly and rule in certain ways,” but that this did not absolve IJs of their constitutional obligations. *Id.* at *11–12. This observation is further supported by the Declaration of Jorge E. Artieda, Esq., attached as Exhibit G, in which an attorney with over two decades of immigration experience—including service as an ICE prosecutor—describes a “seismic shift” in bond hearing outcomes beginning in January 2026, with IJs systematically denying bond in post-habeas cases using rationales that “appear to bear little relationship to genuine individualized risk assessment.” Exh. G (Artieda Decl.), at ¶¶ 8–11, 16–18.

IV. Immediate Release Is the Appropriate Remedy.

Where a bond hearing is constitutionally inadequate, federal courts have broad discretion to fashion appropriate relief, including ordering immediate release. *See Garcia*, 2025 WL 3466312, at *11 (ordering immediate release where “due process violations ... pervaded his bond hearing”); *Morrissey v. Brewer*, 408 U.S. 471, 481 (1972). This Court’s original Order already provided for immediate release as an alternative remedy if a compliant bond hearing was not conducted. Because the hearing that was conducted did not comport with due process, Petitioner respectfully submits that release is now warranted.

The pattern of constitutionally deficient bond hearings is not unique to Petitioner’s case and with EOIR. In January 2026, Chief Judge Patrick J. Schiltz of the District of Minnesota—a conservative jurist appointed by President George W. Bush—found that ICE had violated 96 court orders across 74 immigration cases since January 1, a tally he described as “almost certainly substantially understated.” Exh. E (Feuer, N.Y. Times, dated 01/28/2026). Judge Schiltz admonished that ICE had disobeyed more judicial directives in a single month than “some federal agencies have violated in their entire existence,” and warned: “ICE is not a law unto itself.” *Id.*

Concurrent with this pattern of noncompliance, there is mounting evidence that the

Executive Branch is exerting direct pressure on Immigration Judges to reach predetermined outcomes.¹ Immigration attorney Matthew Hoppock reported on February 4, 2026, that every Somali client he represents in immigration court—eight individuals—had their hearings simultaneously cancelled and their cases reassigned to a single Immigration Judge presiding by video from Louisiana. *See* Exh. D (Hoppock, Bluesky, Feb. 4, 2026); Exh. F (Biography of Matthew Hoppock). Multiple other immigration attorneys reported the same reassignment pattern affecting all of their Somali clients. *Id.* Investigative reporting subsequently identified the reassigned judge as a former ICE prosecutor who denied asylum claims at a rate of 85.3% between 2020 and 2025—and over 95% in 2025 alone—compared to a national average denial rate of 58.9%. *See* Exh. K (Legum, Popular Information, 02/09/2026). This same judge’s bond decision in another high-profile case was later overturned by a federal district court for due process violations. *Id.*

These developments underscore the need for robust federal judicial oversight to ensure that habeas relief ordered by this Court is not rendered meaningless. When IJs face documented pressure to deny bond and dismiss cases, and when ICE has demonstrated a pattern of defying federal court orders, the only adequate remedy is one that does not depend on agency compliance with constitutional norms it has already shown a willingness to disregard.²

V. Exhibits

Petitioner attaches the following exhibits in support of this Status Report:

Exhibit A: Petitioner’s Bond Filing Before the Immigration Court

¹ A former judge in the Chelmsford Immigration Court recently stated in an interview that he “was told to rule in a certain way” by his superiors, who “also had pressure from above.” *Romero*, 2025 WL 2403827, at *7 (citing Oscar Margain, *Fired Immigration Judges Describe Threat to Judicial Independence from Justice Dept.*, NBC Boston (July 25, 2025), <https://www.nbcboston.com/news/local/fired-us-immigration-judge-interviews/3776340>).

² Undersigned counsel also requests that this Honorable Court take judicial notice of the number of FBI agents, DOJ attorneys, and federal employees who have resigned over concerns that they be forced to act in a manner contrary to law.

Exhibit B: Form I-213 – Record of Deportable/Inadmissible Alien

Exhibit C: Judd Legum, *How Trump is rigging immigration courts against Somali migrants*, Popular Information (Blog) (Feb. 9, 2026), available at https://popular.info/p/how-trump-is-rigging-immigration?utm_medium=ios&triedRedirect=true

Exhibit D: Matthew Hoppock (@hoppock.bsky.social), Bluesky (Feb. 4, 2026, at 3:01 p.m.), <https://bsky.app/profile//post/3me2okhiqj22u>

Exhibit E: Alan Feuer, *Judge in Minnesota Says ICE Has Violated Nearly 100 Court Orders*, N.Y. Times (Jan. 28, 2026), available at <https://www.nytimes.com/2026/01/28/us/politics/judge-minnesota-ice-court-orders.html>

Exhibit F: Biography of Matthew Hoppock, available at <https://www.hoppocklawfirm.com/matthewhoppock/>

Exhibit G: Declaration of Jorge E. Artieda, Esq.

VI. Conclusion

“The fact that some aliens posed a risk of flight in the past does not mean they will forever fall into that category. Similarly, presenting danger to the community at one point by committing crime does not place them forever beyond redemption.” *Chi Thon Ngo*, 192 F.3d at 398. The current politicization and hollowing out of the immigration court system, replete with mass firings of immigration judges who fail to deny or restrict relief to noncitizens, requires judicial intervention until the presumption of regularity returns.³ This Court should order immediate release.

³ Ximena Bustillo and Scott Simon, *The Trump administration fired nearly 100 immigration judges in 2025. What's next?*, NPR News (Jan. 10, 2026), available at <https://www.npr.org/2026/01/10/nx-s1-5672386/the-trump-administration-fired-nearly-100-immigration-judges-in-2025-whats-next> (“The DOJ's own hiring campaign calls these positions deportation judges, not immigration judges. And the DOJ is expected to bring on more military lawyers as temporary immigration judges this month.”).

Petitioner's liberty interest and the presumption in favor of the least restrictive means of ensuring appearance outweigh the concern of flight risk, particularly given Petitioner's history of compliance, community ties, and proposed conditions. The public interest is served by ensuring that detention is not more restrictive than necessary and that constitutional principles are upheld. Accordingly, this Court should order Petitioner's immediate release or, in the alternative, set a bond that reasonably assures Petitioner's appearance and compliance.

WHEREFORE, Petitioner respectfully requests that the Court grant this Motion to Enforce the Court's Order.

Respectfully submitted,

Dated: March 30, 2026

s/ Conor Deane, Esq.

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ATTORNEY FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that on March 30, 2026, I caused the foregoing Petitioner's Motion to Enforce Court Order to be filed via the Court's CM/ECF system, which will send notice to all counsel of record.

Date: March 30, 2026

s/Conor Deane
Conor Deane (PA Bar 326277)
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ATTORNEY FOR PETITIONER

Exhibit A

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DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ELIZABETH, NEW JERSEY

In the Matter of:)
)
BERELASHVILI, Giorgi)
)
Respondent)
_____)

File No: A 
In Bond Proceedings

**RESPONDENT'S NOTICE OF INTENT TO OFFER EVIDENCE
IN SUPPORT OF BOND REDETERMINATION**

Judge: Hon. Wilson, Tamar

Next Hearing (Custody): March 26, 2026

MANA ALIABADI, ESQ.
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DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ELIZABETH, NEW JERSEY

_____)
In the Matter of:)
)
BERELASHVILI, Giorgi)
)
Respondent)
_____)

File No: 

In Bond Proceedings

RESPONDENT'S LIST OF EXHIBITS
IN SUPPORT OF BOND REDETERMINATION

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| | <ul style="list-style-type: none"> • Giorgi is a close friend of mine and my family. I have known him for many years, and can say he is an honest, reliable, and trustworthy person. He comes from a good and respectful family and has strong values. | |

- Giorgi is a calm, kind, and hardworking person. He respects others, communicates well, and always tries to help people when he can. He takes his responsibilities seriously and finishes what he starts. He is also disciplined and makes good decisions.
- You can trust Giorgi in both personal and professional situations. I am confident that he will represent himself with respect and responsibility. I believe Giorgi Berelashvili is a very good candidate and will do the right thing.

2. Konstantine Khabalashvili, *Respondent's childhood LPR friend* 93-94

- I have known Giorgi since childhood for many years, but we became much closer after he came to the United States. When Giorgi received his work authorization we worked together at Doordash. During that time, I saw that he is a very responsible and hardworking person. He always takes his work seriously and does his best. Because of this, I respect him a lot. I truly value our friendship and would like to continue it here in the United States.

3. Davit Tlashadze, *Respondent's childhood LPR friend* 95-96

- Giorgi and I have known each other since childhood. I met with him when I started going to a sports school where there were wrestling and boxing training halls. Before our training started Giorgi and I spent a lot of time together, and that is how [we] became close friends. He is [a] very caring, disciplined, and kind person. He has always been respectful and well mannered. To this day, we still have a very close friendship and [I] truly value him as a person. I truly hope that Giorgi[i] can be free and live safely because he is a good person and deserves this opportunity.

4. Tisia Khanashvili, *Respondent's LPR friend* 97

- I have known him since early childhood, and over the years, I have come to know him as a person of integrity, responsibility, and diligence.
- Giorgi is hardworking, trustworthy, and consistently demonstrates strong moral character. I have always found him to be reliable, considerate, and someone who treats others with respect. I can confidently say that a friendship or association with him is safe and positive.
- It is my sincere belief that Giorgi Berelashvili is a person of good character, and I fully support and vouch for him.

5. Giorgi Tsetskhladze, *Respondent's LPR friend* 98

- He is a close friend of mine and my family, and we know him and his family very well. He comes from a good and respectful family. [REDACTED] He was raised with strong values. Giorgi is an honest and reliable person. He keeps his word and takes responsibility seriously. It is not easy to find someone like him today. My family and I respect him a lot. I fully support him and take responsibility for his good character. If you need more information, please feel free to contact me.

6. Giorgi Tkheldize, *Respondent's LPR Friend* 99-100

- I met Giorgi at a gathering with friends when he had just recently arrived. We discovered that we were from the same city and I also learned that he is a relative of one of my close friends.
- That is when our close friendship began. From our very first conversation. I could clearly see that family and friends are his top priority. Giorgi is a kind, respectful, and responsible person, and someone I truly respect and trust.
- I strongly believe that Giorgi deserves the opportunity to live safely in the United States. He respects the law, follows the rules and treats people with kindness and honesty. He is a good person who brings positive energy to those around him.

7. Salome Chichua, *Respondent's LPR friend* 101-102

- When I first came to the United States, I felt lost and only knew a few people. I met Giorgi through my roommate, and he quickly became someone very important to me. He helped me with everything – taking me to the bank, the DMV, and showing me around. He made a new country feel less scary and more like home. He ever organized a trip with friends to New York, which was my first time there. That experience meant so much to me, and it showed how much he cares about bringing people together and making others happy. Giorgi is a very caring person who always thinks about others. I will never forget how much easier he made my life during such an important time. I truly hope Giorgi can stay, because people like him bring kindness and happiness to everyone around them.

8. Maka Demetrashvili, *Respondent's U.S. Citizen Friend* 103

- I've known Giorgi Berelashvili for many years, beginning back in our home country of Georgia, and since he came to the U.S. we have continued being good friends.

- In all the years I have known him, I can say he is [a] very responsible, honest and hardworking person. I am confident that he will continue to act responsibly and follow all requirements set for him.

9. Anna Karanadze, *Respondent's U.S. Citizen Friend*

104-105

- I have known Giorgi Berelashvili for about a year. I met him at a friend's birthday, and we became friends right away. He is [a] hardworking, respectful, and polite person with strong family values. He has always been welcome to my home. He never misses important events and my 3 year old daughter loves him. He is great with kids. He is also dependable and also keeps his word. I truly believe he is a good person and I support him.

10. Tinatun Chkhitunidze *Respondent's LPR Friend*

106-107

- We met through my cousin. They mentioned Giorgi and said since we are so close in age we should become friends and get to know each other. Considering I am very laid back and very shy, I usually have a hard time becoming friends with people. When I met Giorgi, he had such a good spirit and was so positive that I didn't have to shy away. He made me feel welcomed and comfortable right away.
- Giorgi is a kind and genuine person, and I truly value our friendship. I fully support him and hope you take this into consideration.

11. Tatia Gvaramadze, *Respondent's U.S. Citizen Friend*

108-109

- I met Giorgi at [REDACTED] Church last year. I have three boys, and through church gatherings they got to know him. They quickly became fond of him, and I was very happy to see them look up to such a good and respectful person.
- Giorgi is a polite, well-mannered young man who was clearly raised with strong values. I truly appreciate the positive influence he has on my children, and I hope my boys grow up to be as respectful and well-rounded as he is.
- I fully support Giorgi and respectfully ask that you consider this in your decision.

12. Beka Avazneli, *Respondent's U.S. Citizen childhood Friend*

110-111

- I've known Giorgi Berelashvili since the day he was born. We grew up in the same hometown and spent our whole lives side by

side. We trained together in boxing, played soccer, and built a friendship that I truly consider brotherhood.

- Giorgi is one of the most trustworthy people I know. He has always been there for his family and friends, no matter what. I've seen him put others before himself time and time again. He's the kind of person who would take the shirt off his back to just help someone in need.
- I fully support Giorgi. He is a genuine, kind, dependable man – someone every community needs.


R. Respondent's Photos with Family and Friends in Georgia

112-114

TAB D

03.25.2026

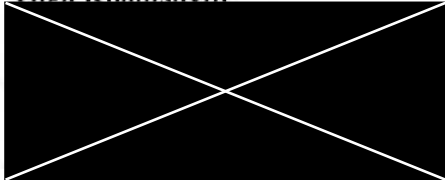
Dear Immigration Judge,

I, Giga khanishvili , was born on  I am a PERMANENT RESIDENT of the United States. I am currently employed at Self Employed . I agree to pay the Immigration Bond in the case of Giorgi Berelashvili , if a bond is set in the case. I know Giorgi Berelashvili and his family more then 15 years He is very close Friend of mine . Please contact me, should you have any additional questions or concerns.

Respectfully submitted,

G. Khanishvili

Giga Khanishvili

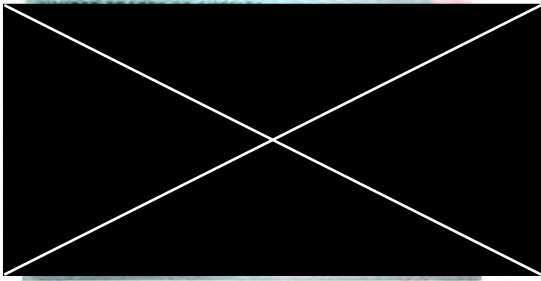


TAB P





TAB Q



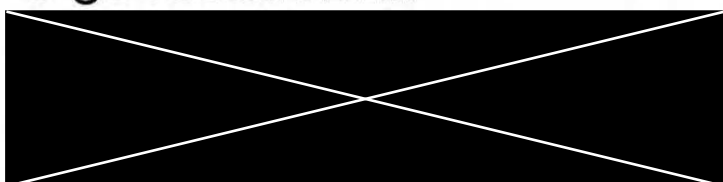
I, Giga Khanishvili, am writing this letter to recommend Giorgi Berelashvili.

Giorgi is a close friend of mine and my family. I have known him for many years, and I can say he is an honest, reliable, and trustworthy person. He comes from a good and respectful family and has strong values.

Giorgi is a calm, kind, and hardworking person. He respects others, communicates well, and always tries to help people when he can. He takes his responsibilities seriously and finishes what he starts. He is also disciplined and makes good decisions.

You can trust Giorgi in both personal and professional situations. I am confident that he will represent himself with respect and responsibility. I believe Giorgi Berelashvili is a very good candidate and will do the right thing.

Giga Khanishvili



my name is Konstantine Khabalashvili

(A# ~~XXXXXXXXXX~~) Phone Number

Date: march 05/07/1992

I have known Giorgi since childhood for many years, but we became much closer after he came to the United States. When Giorgi received his work authorization, we worked together at DoorDash. During that time, I saw that he is a very responsible and hardworking person. He always takes his work seriously and does his best. Because of this, I respect him a lot. I truly value our friendship and would like to continue it here in the United States.

Sincerely

Konstantine Khabalashvili

K. K

To whom it may concern

My name is Davit Tlashadze, Giorgi and I have known each other since childhood.

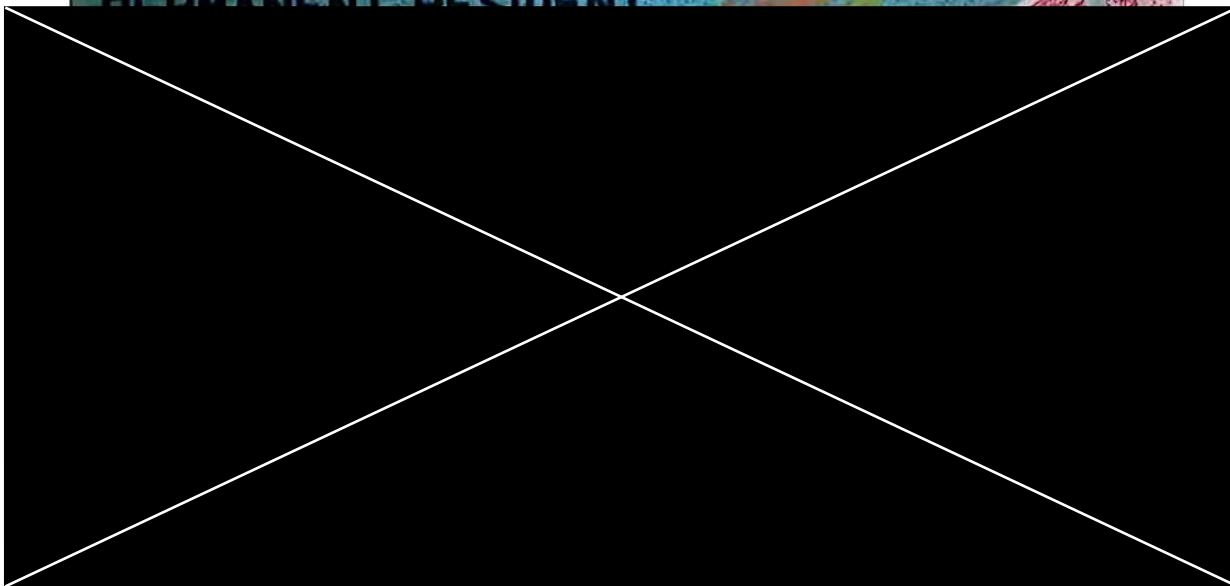
I met him when I started going to a sports school where there were wrestling and boxing training halls. Before our training started Giorgi and I spend a lot time together, and that is how became close friends.

He is very caring, disciplined and kind person. He has always been respectful and well mannered. To this day, we still have a very close friendship and truly value him as a person. I truly hope that Giorgi can be free and live safely, because he is a good person who deserves this opportunity.

Sincerely

Davit Tlashadze





Character Reference for Giorgi Berelashvili

I am writing to provide a character reference for Giorgi Berelashvili. I have known him since early childhood, and over the years, I have come to know him as a person of integrity, responsibility, and diligence.

Giorgi is hardworking, trustworthy, and consistently demonstrates strong moral character. I have always found him to be reliable, considerate, and someone who treats others with respect. I can confidently say that a friendship or association with him is safe and positive.

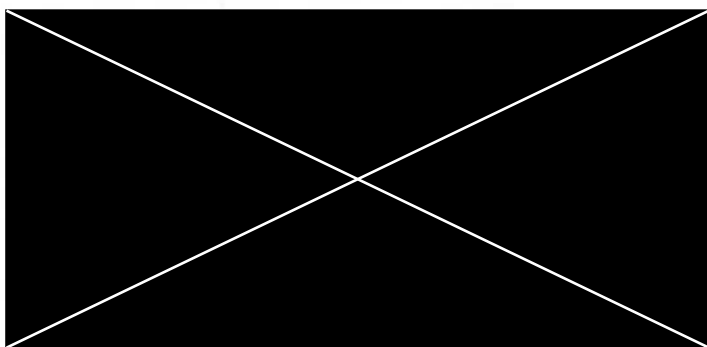
It is my sincere belief that Giorgi Berelashvili is a person of good character, and I fully support and vouch for him.

Sincerely,

Tsisia Khanishvili



Ts. Khanishvili



My name is Giorgi Tsetskhladze,

USCIS#



I would like to support Giorgi Berelashvili.

He is a close friend of mine and my family, and we know him and his family very well. He comes from a good and respectful family. His father is a priest in Georgia, and he was raised with strong values. Giorgi is an honest and reliable person. He keeps his word and takes responsibility seriously. It is not easy to find someone like him today.

My family and I respect him a lot. I fully support him and take responsibility for his good character. If you need more information, please feel free to contact me.

Sincerely,

Giorgi Tsetskhladze



G.TSETSKHLADZE

03/24/20

My name is Giorgi Tkhelidze [REDACTED]

CA# [REDACTED] Phone Number [REDACTED]

I met Giorgi at a gathering with friends when he had just recently arrived. We discovered that we were from the same city and I also learned that he is a relative of one of my close friends.

That is when our close friendship began. From our very first conversation I could clearly see that family and friends are his top priority. Giorgi is a kind, respectful, and responsible person, and someone I truly respect and trust.

I strongly believe that Giorgi deserves the opportunity to live safely in the United States. He respects the law, follows the rules, and treats people with kindness and honesty. He is a good person who brings positive energy to those around him.

Sincerely
 Giorgi Tkhelidze
 G.T.

My name is Salome Chichua (

Phone Number


Date: March 23, 2026

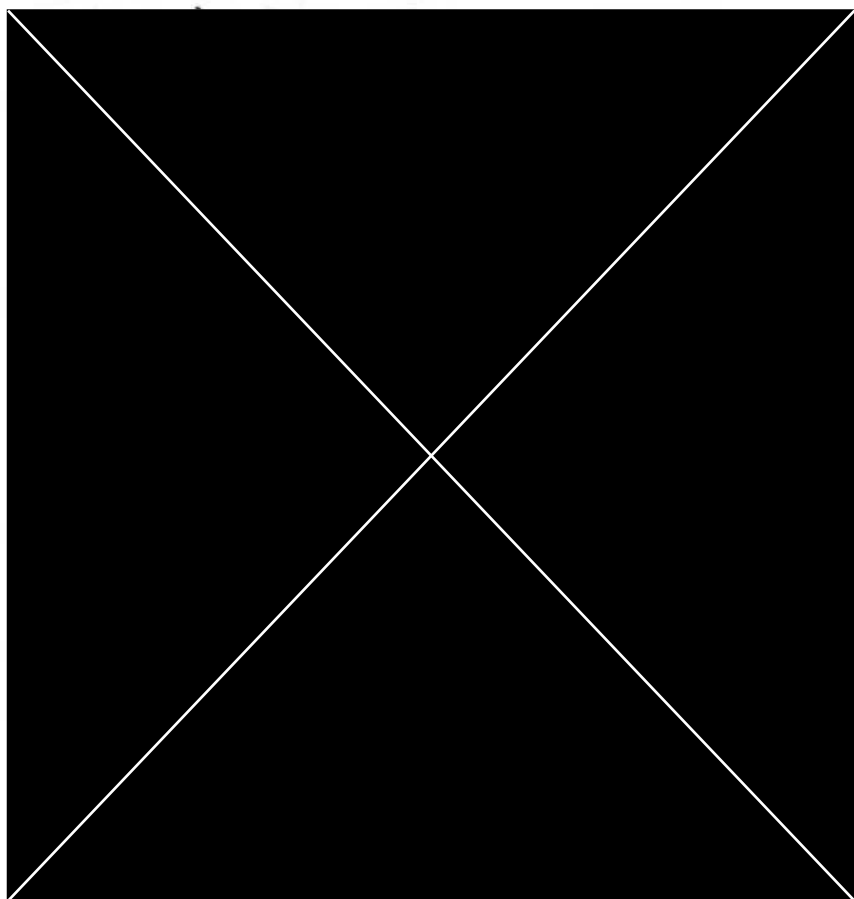
When I first came to the United States, I felt lost and only knew a few people. I met Giorgi through my roommate, and he quickly became someone very important to me. He helped me with everything - taking me to the bank, the DMV, and showing me around. He made a new country feel less scary and more like home. He even organized a trip with friends to New York, which was my first time there. That experience meant so much to me, and it showed how much he cares about bringing people together and making others happy. Giorgi is a very caring person who always thinks about others. I will never forget how much easier he made my life during such an important time.

I truly hope Giorgi can stay, because people like him bring kindness and happiness to everyone around them.

Sincerely

Salome Chichua

S. 



653969944908792953403673147012569<176352

To whom it may concern,



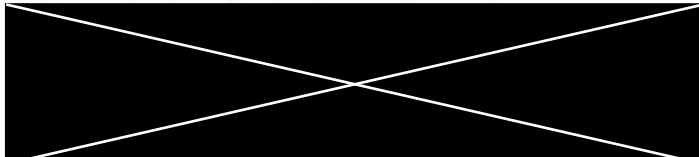
My name is Maka Demetrashvili. D.O.B.

I've known Giorgi Berelashvili for many years, beginning back in our home country of Georgia, and since he came to the USA we have continued being good friends.

In all the years I have known him, I can say he is very responsible, honest and hardworking person. I am confident that he will continue to act responsibly and follow all requirements set for him


Sincerely,

Maka Demetrashvili



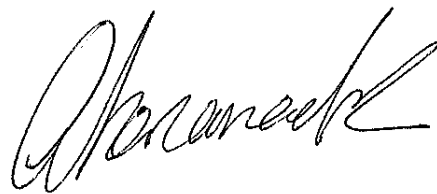
M. Dem

To Whom It May Concern

My name is Anna Karanadze (Passport No. )
I have known Giorgi Berelashvili for about a year. I met
him at a friend's birthday, and we became friends
right away. He is hardworking, respectful, and polite.
Person with strong family values. He has always
been welcome to my home. He never misses
important events, and my 3 year old daughter
loves him. He is great with kids. He is also
dependable and also keeps his word. I truly
believe he is a good person and I support him.

Sincerely

Anna Karanadze

03-23-2026

Tinatin Chkhitudze

Date of Birth: 09/22/2002



To Whom It May Concern,

I am writing this letter to support Giorgi Berelashvili.

We met through my cousin. They mentioned Giorgi and said since we are so close in age, we should become friends and get to know each other. Considering I am very laid back and very shy, I usually have a hard time becoming friends with people. When I met Giorgi, he had such a good spirit and was so positive that I didn't have to shy away. He made me feel welcomed and comfortable right away.

Giorgi is a kind and genuine person, and I truly value our friendship. I fully support him and hope you take this into consideration.

Sincerely,

Tinatin Chkhitudze



T. Chkhitudze


Tatia Gvaramadze



Passport No. 

To Whom It May Concern,

I am writing this letter to support Giorgi Berelashvili.

I met Giorgi at  Church last year. I have three boys, and through church gatherings they got to know him. They quickly became fond of him, and I was very happy to see them look up to such a good and respectful person.

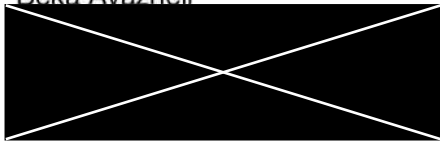
Giorgi is a polite, well-mannered young man who was clearly raised with strong values. I truly appreciate the positive influence he has on my children, and I hope my boys grow up to be as respectful and well-rounded as he is.

I fully support Giorgi and respectfully ask that you consider this in your decision.

Sincerely,
Tatia Gvaramadze
03/22/2026

A handwritten signature in cursive script, appearing to read "T. Gvaramadze".

Beka Avazneli



I've known Giorgi Berelashvili since the day he was born. We grew up in the same hometown and spent our whole lives side by side. We trained together in boxing, played soccer, and built a friendship that I truly consider brotherhood.

Giorgi is one of the most trustworthy people I know. He has always been there for his family and friends, no matter what. I've seen him put others before himself time and time again. He's the kind of person who would take the shirt off his back just to help someone in need.

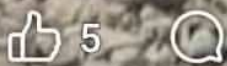
I fully support Giorgi. He is a genuine, kind, and dependable man—someone every community needs.

Sincerely,
Beka Avazneli

A handwritten signature in cursive script that reads "B Avazneli".

TAB R







MANA ALIABADI, ESQ.
Palladino, Isbell & Casazza, LLC
1528 Walnut St, Suite 1701
Philadelphia, PA 19102
Ph: (215) 576-9000
Fax: (215) 689-3531
mana@piclaw.com
EOIR ID#: AA011148

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ELIZABETH, NEW JERSEY

In the Matter of:)
)
BERELASHVILI, Giorgi)
)
Respondent)
_____)

File No: 
In Bond Proceedings

RESPONDENT'S CERTIFICATE OF SERVICE

I, Mana Aliabadi, Esq., hereby certify that on 03/25/2026, I caused a true and correct copy of the attached Respondent's Notice of Intent to Offer Evidence with all attachments to be served via ECAS, therefore no separate service is required.

Date: 03/25/2026

MANA ALIABADI, ESQ.
Palladino, Isbell & Casazza, LLC
1528 Walnut St, Suite 1701
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Ph: (215) 576-9000
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conor@piclaw.com
EOIR ID#: KK417959

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ELIZABETH, NEW JERSEY

In the Matter of:

BERELASHVILI, Giorgi

Respondent

File No: A



In Bond Proceedings

**RESPONDENT'S NOTICE OF INTENT TO OFFER EVIDENCE
IN SUPPORT OF BOND REDETERMINATION**

Judge: Hon. Ryan, Dennis


Next Hearing (Custody): March 26, 2026

CONOR DEANE, ESQ.
Palladino, Isbell & Casazza, LLC
1528 Walnut St, Suite 1701
Philadelphia, PA 19102
Ph: (215) 576-9000
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conor@piclaw.com
EOIR ID#: KK417959

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ELIZABETH, NEW JERSEY

_____)
In the Matter of:)
)
BERELASHVILI, Giorgi)
)
Respondent)
_____)

File No: A 
In Bond Proceedings

RESPONDENT'S LIST OF EXHIBITS
IN SUPPORT OF BOND REDETERMINATION

| <u>TAB</u> | <u>DESCRIPTION</u> | <u>PAGE</u> |
|-------------------|--|--------------------|
| S. | Executive Order – December 18, 2024 <i>Executive Order 14129—Providing for the Closing of Executive Departments and Agencies of the Federal Government on December 24, 2024.</i> | |

Exhibit S

Federal Register

Presidential Documents

Vol. 89, No. 247

Thursday, December 26, 2024

Title 3—

Executive Order 14129 of December 18, 2024

The President

Providing for the Closing of Executive Departments and Agencies of the Federal Government on December 24, 2024

By the authority vested in me as President by the Constitution and the laws of the United States of America, it is hereby ordered as follows:

Section 1. All executive departments and agencies of the Federal Government shall be closed and their employees excused from duty on Tuesday, December 24, 2024, the day before Christmas Day.

Sec. 2. The heads of executive departments and agencies may determine that certain offices and installations of their organizations, or parts thereof, must remain open and that certain employees must report for duty on December 24, 2024, for reasons of national security, defense, or other public need.

Sec. 3. December 24, 2024, shall be considered as falling within the scope of Executive Order 11582 of February 11, 1971, and of 5 U.S.C. 5546 and 6103(b) and other similar statutes insofar as they relate to the pay and leave of employees of the United States.

Sec. 4. The Director of the Office of Personnel Management shall take such actions as may be necessary to implement this order.

Sec. 5. General Provisions. (a) Nothing in this order shall be construed to impair or otherwise affect:

(i) the authority granted by law to an executive department or agency, or the head thereof; or

(ii) the functions of the Director of the Office of Management and Budget relating to budgetary, administrative, or legislative proposals.

(b) This order shall be implemented consistent with applicable law and subject to the availability of appropriations.

(c) This order is not intended to, and does not, create any right or benefit, substantive or procedural, enforceable at law or in equity by any party against the United States, its departments, agencies, or entities, its officers, employees, or agents, or any other person.



THE WHITE HOUSE,
December 18, 2024.

CONOR DEANE, ESQ.
Palladino, Isbell & Casazza, LLC
1528 Walnut St, Suite 1701
Philadelphia, PA 19102
Ph: (215) 576-9000
Fax: (215) 689-3531
conor@piclaw.com
EOIR ID#: KK417959

DETAINED

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
ELIZABETH, NEW JERSEY

In the Matter of:)
)
BERELASHVILI, Giorgi)
)
Respondent)
_____)

File No: A 
In Bond Proceedings

RESPONDENT'S CERTIFICATE OF SERVICE

I, Conor Deane, Esq., hereby certify that on 03/26/2026, I caused a true and correct copy of the attached Respondent's Notice of Intent to Offer Evidence with all attachments to be served via ECAS, therefore no separate service is required.

Date: 03/26/2026

CONOR DEANE, ESQ.
Palladino, Isbell & Casazza, LLC
1528 Walnut St, Suite 1701
Philadelphia, PA 19102
Ph: (215) 576-9000
Fax: (215) 689-3531
conor@piclaw.com

Exhibit B



**U.S. DEPARTMENT OF HOMELAND SECURITY CERTIFICATION OF
FORM I-213, RECORD OF RECORD OF DEPORTABLE/INADMISSIBLE ALIEN**

I HEREBY CERTIFY AND ATTEST in my official capacity that I printed out the attached unaltered Form I-213, *Record of Deportable/Inadmissible Alien*, directly from the U.S. Department of Homeland Security's (DHS) Enforcement Integrated Database (EID), described in the *Department of Homeland Security/U.S. Immigration and Customs Enforcement-011 Immigration and Enforcement Operational Records System of Records*, 75 Fed. Reg. 9238-01, 9239, 2010 WL 677554 (March 1, 2010), during the regular course of business. My production of the Form I-213, which relates to the person whose name and A-number appears as the subject, was done as part of my official duties pursuant to 8 C.F.R. §§ 1240.2 and 1240.32(c) and the legal authority given to me to access EID.

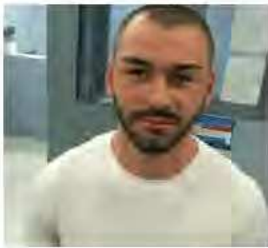
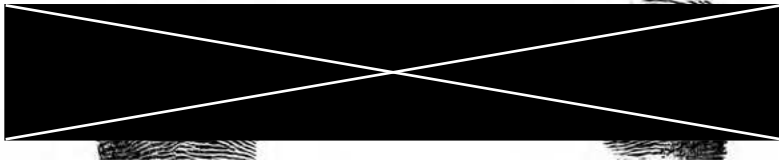
A handwritten signature in cursive script that reads "Mary Zurn".

Mary Zurn
Legal Assistant
ICE/DHS/OPLA
Philadelphia, Pennsylvania (York Sub-Office)

U.S. Department of Homeland Security

Subject ID : [REDACTED]

Record of Deportable/Inadmissible Alien

| | | | | | | | |
|--|--|---|---|---|---|---|----------------------|
| Family Name (CAPS) BERELASHVILI, GEORGI | | First | Middle | Sex M | Hair BRO | Eyes BRO | Cmpbkn MED |
| Country of Citizenship GEORGIA | Passport Number and Country of Issue See Narrative | | [REDACTED] | Height 70 | Weight 176 | Occupation UNR | |
| U.S. Address [REDACTED] 19152, UNITED STATES | | | | Scars and Marks | | | |
| Date, Place, Time, and Manner of Last Entry 09/17/2022 13:40, OTM, | | | Passenger Boarded at | | F.B.I. Number [REDACTED] | | |
| Number, Street, City, Province (State) and Country of Permanent Residence | | | | <input checked="" type="checkbox"/> Single <input type="checkbox"/> Divorced <input type="checkbox"/> Married <input type="checkbox"/> Widower <input type="checkbox"/> Separated | | | |
| Date of Birth [REDACTED] | Age: 26 | Date of Action 03/06/2026 | Location Code PHI/PHI | | Method of Location/Apprehension NCA | | |
| City, Province (State) and Country of Birth GORI, GEORGIA | | AR <input checked="" type="checkbox"/> | Form: (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/> | | | | |
| NIV Issuing Post and NIV Number | | Social Security Account Name | | | | | |
| Date Visa Issued | | Social Security Number | | | | | |
| Immigration Record NEGATIVE | | | | Criminal Record | | | |
| 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 BERELASHVILI, BATCIO NATIONALITY: GEORGIA ADDRESS: TINISKHIDI GORI, SHIDA KARTLI, GEORGIA | | | Mother's Present and Maiden Names, Nationality, and Address, if Known BERELASHVILI, IA NATIONALITY: GEORGIA ADDRESS: TINISKHIDI GORI, SHIDA KARTLI, GEORGIA | | | | |
| 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 Word(s) See Narrative | | |
| Name and Address of (Last/Current) U.S. Employer | | Type of Employment Unemployed or Retired | | Salary | Employed from/to | | |
| 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: [REDACTED] | | Left Index fingerprint | | | Right Index fingerprint | | |
|  | |  | | | | | |
| Body Worn Camera (BWC) Information ----- BWC footage was recorded for this enforcement activity. | | | | | | | |
| FAMILY INFORMATION ----- Father: BERELASHVILI, BATCIO is a citizen of GEORGIA. Mother: BERELASHVILI, IA is a citizen of GEORGIA. Spouse: Subject is not married. Child: Subject does not have children or dependents. ... (CONTINUED ON I-831) | | | | | | | |
| Alien has been advised of communication privileges _____ (Date/Initials) | | | | _____ ASHLEY HANN Deportation Officer (Signature and Title of Immigration Officer) | | | |
| Distribution: A file | | Received: (Subject and Documents) (Report of Interview) Officer: ASHLEY HANN on: March 6, 2026 (time) Disposition: Warrant of Arrest/Notice to Appear Examining Officer: MCCALLION, PATRICK | | | | | |

EOIR - 2 of 5

U.S. Department of Homeland Security

Continuation Page for Form I-213

| | | |
|--------------------------------------|---------------------------|--------------------|
| Alien's Name BERELASHVILI, GIORGI | File Number [REDACTED] | Date 03/06/2026 |
|--------------------------------------|---------------------------|--------------------|

SUBJECT HEALTH STATUS

The subject claims good health.

CURRENT ADMINISTRATIVE CHARGES

03/06/2026 - 212a6Ai - ALIEN PRESENT WITHOUT ADMISSION OR PAROLE - (PWAs) 03/06/2026 - 212a7AiI - IMMIGRANT WITHOUT AN IMMIGRANT VISA

RECORDS CHECKED

CIS checked on 03/06/2026 with Positive result. EARM checked on 03/06/2026 with Positive result. IAFIS checked on 03/06/2026 with Unknown result. NCIC checked on 03/06/2026 with Negative result. TECS checked on 03/06/2026 with Unknown result. NLETS checked on 03/06/2026 with Positive result.

ARRESTED AT/NEAR

[REDACTED] PENNSYLVANIA, 19152, UNITED STATES

RECORD OF DEPORTABLE/EXCLUDABLE ALIEN:

Method of Encounter/Location:

On March 6th, 2026, ICE/EPO and ATF officers conducted a targeted operation in the area of [REDACTED] where BERELASHVILI, Giorgi resided (Hereafter referred as BERELASHVILI). Around 1040hrs, a male subject matching the description of BERELASHVILI was observed walking from the listed address towards a [REDACTED] Camry PA license plate: [REDACTED] which is registered to BERELASHVILI and entered the vehicle. Officers initiated flashing red and blue lights and wore clearly identifiable Police vests with insignias. When asked, the male subject presented a Pennsylvania driver's license in the target's name. BERELASHVILI was handcuffed and placed under arrest. BERELASHVILI was then transported to the BERELASHVILI Philadelphia Field office without incident.

Alienage and Removability:

BERELASHVILI is a native and citizen of Georgia by birth on [REDACTED] On September 17th, 2022, entered the United States unlawfully without inspection or admission. BERELASHVILI was arrested and taken into custody by Border Patrol. BERELASHVILI was later released and enrolled into the ATD program as a condition of Parole. On December 24th, 2024, BERELASHVILI violated his conditions of Parole as he had failed to report for his yearly check-in.

Immigration History, Status and Pending Petitions:

Record Checks reveal no pending petitions pertaining to immigration.

Criminal History:

BERELASHVILI has no identifiable criminal history in the United States.

Intel:

NCIC was negative for wants or warrants.

Disposition:


BERELASHVILI will be served form I-862, Notice to Appear and detained in ICE custody pending the outcome of his immigration proceedings.

| | |
|--------------------------|------------------------------|
| Signature ASHLEY HANN | Title Deportation Officer |
|--------------------------|------------------------------|

EOIR - 3 of 5

U.S. Department of Homeland Security


Continuation Page for Form I-213

| | | |
|--------------------------------------|---|--------------------|
| Alien's Name BERELASHVILI, GIORGI | File Number  | Date 03/06/2026 |
|--------------------------------------|---|--------------------|

OTHER IDENTIFYING NUMBERS

ALIEN- 

PASSPORT NUMBER AND COUNTRY OF ISSUE

 (GEORGIA) GEORGIA

| | |
|--------------------------|------------------------------|
| Signature ASHLEY HANN | Title Deportation Officer |
|--------------------------|------------------------------|

EOIR - 4 of 5

PROOF OF SERVICE

This document was electronically filed through ECAS and both parties are participating in ECAS. Therefore, no separate service was completed.

/s/ Samuel Rivera
Assistant Chief
Counsel

Exhibit C

How Trump is rigging immigration courts against Somali migrants

JUDD LEGUM
FEB 09, 2026

413 32 125 Share



(Photo by Adam Gray/Getty Images)

During a December 2 cabinet meeting, President Trump unleashed [a torrent of bigoted invective](#) against Somali migrants. “We’re going to go the wrong way if we keep taking in garbage into our country,” Trump said. “They come from hell, and they complain and do nothing but bitch.”

At the same meeting, Trump made clear that he wanted all Somalis to be kicked out of the United States. “I don’t want them in our country,” Trump announced. “Their country is no good for a reason. Their country stinks, and we don’t want them in our country.”

At a December 10 event in Pennsylvania, Trump [repeated his dehumanizing tirade](#), calling Somalia a “shithole” nation. “The Somalians should be out of here,” Trump said, describing their homeland as “filthy, dirty, disgusting, [and] ridden with crime.”

It is clear what Trump wants, but all migrants in the United States have due process rights under federal law. Specifically, Somali migrants have the right to appear before an immigration judge and seek asylum based on a well-founded fear of persecution based on race, religion, political views, or another protected category. This is a particular risk in Somalia, where al-Shabaab, an Islamist militant group, is responsible for hundreds of thousands of civilian casualties.

The Trump administration, however, appears to be manipulating the judicial process to dramatically reduce the chance that Somali immigrants are granted asylum.

Matthew Hoppock is an [immigration lawyer based in Kansas City](#). He currently represents eight Somali migrants in immigration court. On February 4, Hoppock said that all his cases had been [reassigned to a new immigration judge](#). While the cases will still be heard in Kansas City, this new judge will preside via video conference from Louisiana. According to Hoppock, other immigration lawyers representing Somalis have had their cases reassigned to the same judge on the same day.

The judge who will now be hearing these cases involving Somali migrants is Sherron Ashworth, Popular Information has learned. Ashworth is a former ICE prosecutor with a track record of quickly rejecting most asylum claims and accepting the Trump administration’s most specious legal arguments.

Unlike other court systems, immigration courts are run by the Department of Justice (DOJ) under the [Executive Office of Immigration Review](#) (EOIR). Although it is normally handled as a bureaucratic matter, the DOJ and Attorney General Pam Bondi can reassign immigration cases.

Who is Sherron Ashworth?

Ashworth was first [appointed](#) as an immigration judge in July 2020. She was named to the post as part of a cohort of 46 immigration judges by former Trump Attorney General William Barr. She was hired as part of a push by the first Trump administration to install immigration judges more skeptical of asylum claims. From 2009 to 2020, Ashworth worked as a prosecutor for ICE.

Ashworth has delivered. Between 2020 and 2025, Ashworth has [rejected 85.3% of asylum claims](#). Nationally, the average rejection rate was 58.9%. In 2025, Ashworth denied asylum in more than 95% of cases.

Her work has not gone unnoticed. In January 2026, the DOJ [promoted](#) Ashworth to Acting Assistant Chief Immigration Judge, overseeing the cases for several Louisiana immigration courts. This is a critical position because there is a high concentration of immigration detention centers in the Louisiana area, making these courts a major hub of activity.

Ashworth and the case of Rümeyisa Öztürk

Rümeyisa Öztürk, a 30-year-old Turkish national and Fulbright scholar, was a student at Tufts University when, on March 25, 2025, she was [apprehended by six plainclothes ICE agents](#) and handcuffed. Over the next 24 hours, she was transported over 1,300 miles to the South Louisiana ICE Processing Center in Basile. That facility is overseen by the Oakdale Immigration Court, meaning Öztürk's detention proceedings would be considered by Ashworth.

Secretary of State Marco Rubio said that he had [summarily revoked](#) Öztürk's visa because she was a "lunatic." Öztürk's lawyers say she was never notified that her

visa was revoked.

Lawyers representing Öztürk sought her release on bond. But Ashworth rejected that request, finding that Öztürk was “[both a flight risk and a danger to the community](#).” Ashworth’s decision was based entirely on a Department of State memorandum, which only cited Öztürk’s co-authorship of a 2024 student op-ed critical of Tufts’ stance on Israel and Palestine.

A March State Department memo, later [reported](#) in the Washington Post, “determined that the Trump administration had not produced any evidence showing that she engaged in antisemitic activities or made public statements supporting a terrorist organization.” Further, according to the memo, “Rubio did not have sufficient grounds for revoking Öztürk’s visa.”

In May, after being detained for six weeks, Ashworth’s decision was effectively [overturned](#) by a federal district court judge. District Judge William Sessions said there were “very substantial” and “very significant” claims that Öztürk’s First Amendment rights were violated. “Her continued detention cannot stand,” Sessions said. “There has been no evidence that has been introduced by the government other than the op-ed. I mean, that literally is the case.”

More Somalis may end up in immigration court after March

On January 13, the Trump administration [announced](#) that it was ending Temporary Protected Status (TPS) for Somali nationals. TPS is a humanitarian measure used to protect migrants who would not be safe if they returned to their home country. It has been afforded to Somali nationals since 1991, but will expire on March 17.

“Allowing Somali nationals to remain temporarily in the United States is contrary to our national interests,” Department of Homeland Security Secretary Kristi Noem said. “We are putting Americans first.”

TPS currently benefits about [2,400 Somalis](#), according to ABC News. Once TPS expires in March, this group could be subject to deportation. Somalis will still be able to argue for asylum on a case-by-case basis in light of the ongoing violence in their home country. It is not known how many Somalis will seek asylum after TPS expires, or whether those cases will also be diverted to Ashworth.

In his derogatory comments, Trump has not distinguished between undocumented Somali migrants and other Somalis living in the U.S. According to U.S. Census data, about 80% of the foreign-born Somali population — 93,000 of 115,000 — are [naturalized U.S. citizens](#).

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413 Likes · 125 Restacks

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Discussion about this post

| | |
|----------|----------|
| Comments | Restacks |
|----------|----------|



Write a comment...



Joseph Mangano 11h



The observation that Trump hasn't distinguished between Somali migrants and citizens, whether naturalized or born on American soil, is a salient one. There are no assurances that this administration will do its due diligence in checking people's legal status before trying to deport them. As a result, the humanitarian crisis in the United States is primed to get that much worse.

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Dave Kirkpatrick 11h



tRUmp is turning the US into hell, and all he does is bitch and complain (and lie and commit crimes).

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Exhibit D

← Post



Matthew Hoppock
@hoppock.bsky.social

Follow

I'm not sure what to make of it, but every Somali I represent in immigration court currently (8 of them) have today had their hearings cancelled and their judges reassigned. They're now all assigned to a video judge from Louisiana and scheduled for court hearing in one month. 🤔

3:01 PM · Feb 4, 2026 🌐 Everybody can reply

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Matthew Hoppock @hoppock.bsky.social · 5d

I have never seen anything like it. I don't know what's actually going on, but several attorneys reached out to me this morning and said all of their Somali clients were also transferred to the same judge and now have court on the same date in March. And I don't know for sure why. But it's chilling

💬 11

↻ 195

❤️ 896



Matthew Hoppock @hoppock.bsky.social · 5d

Within a month of our President calling all Somalis "garbage," saying "they contribute nothing" that "they come from hell," "I don't want them in our country," the DOJ appears to be creating a separate process for deportation proceedings based on nationality just for Somalis.

💬 7

↻ 290

❤️ 980



Matthew Hoppock @hoppock.bsky.social · 5d

The Supreme Court settled this in 1954 (Accardi): immigration judges are supposed to be neutral. If they bend to the executive's whims instead of acting neutrally, deporting people bc the President dislikes them, the deportations are unlawful. supreme.justia.com/cases/federa...



Exhibit E

Judge in Minnesota Says ICE Has Violated Nearly 100 Court Orders

A federal judge said ICE had disobeyed more judicial directives this month than “some federal agencies have violated in their entire existence.”

 Listen to this article · 3:09 min [Learn more](#)



By Alan Feuer

Jan. 28, 2026

The chief federal judge in Minnesota excoriated Immigration and Customs Enforcement on Wednesday, saying it had violated nearly 100 court orders stemming from its aggressive crackdown in the state and had disobeyed more judicial directives in January alone than “some federal agencies have violated in their entire existence.”

The extraordinary broadside by the judge, Patrick J. Schiltz, came in a ruling in which he temporarily rescinded an order he had issued on Tuesday, summoning Todd Lyons, the acting director of ICE, to appear in front of him to explain why he should not be held in contempt for violating so many orders arising from the Trump administration’s hard-line immigration actions in Minnesota.

While Judge Schiltz, a conservative jurist appointed by President George W. Bush, let Mr. Lyons off the hook for the moment, he cautioned that he might change his mind and order him to appear again to answer questions if ICE continues to violate court orders.

“ICE is not a law unto itself,” the judge wrote. “ICE has every right to challenge the orders of this court, but, like any litigant, ICE must follow those orders unless and until they are overturned or vacated.”

Judge Schiltz attached to his ruling a list of 96 court orders from 74 different immigration cases that ICE has failed to follow since Jan. 1. He noted that his tally was “almost certainly substantially understated” because it had been “hurriedly compiled by extraordinarily busy judges.”

“This list should give pause to anyone — no matter his or her political beliefs — who cares about the rule of law,” Judge Schiltz added.

The federal courts in Minnesota have been deluged this month by legal cases filed by immigrants swept up in the administration’s dragnet. Some of the immigrants have sought to avoid being sent out of the state by federal agents, while others have complained they were wrongfully detained.

Judge Schiltz’s initial order demanding that Mr. Lyons appear in front of him on Friday arose in the case of Juan Hugo Tobay Robles, an Ecuadorean man who entered the United States illegally nearly 30 years ago and was taken into custody by immigration agents on Jan. 6. Judge Schiltz determined that ICE had detained Mr. Tobay Robles under an improper reading of federal law and two weeks ago instructed federal officials either to let him challenge his detention or release him.

After that failed to happen, the judge told Mr. Lyons to appear in front of him. But he provided a way out. He said that if Mr. Tobay Robles were quickly released, he would cancel the hearing with Mr. Lyons.

Mr. Tobay Robles was, in fact, released from ICE custody in Texas on Tuesday afternoon, his lawyer, Graham Ojala-Barbour, wrote in a letter to Judge Schiltz on Wednesday. But even though his client was free, Mr. Ojala-Barbour asked Judge Schiltz to hold a contempt proceeding with Mr. Lyons, saying the administration’s “failures to comply with this court’s orders” had led to “significant hardships” for the immigrants involved.

Alan Feuer covers extremism and political violence for The Times, focusing on the criminal cases involving the Jan. 6 attack on the Capitol and against former President Donald J. Trump.

Exhibit F

913-267-5511 frontdesk@hoppocklawfirm.com





Matthew L. Hoppock

Owner

Matthew Hoppock is a seasoned immigration advocate and litigator. He focuses his work on serving immigrants, their families, and their employers across the United States, with a particular emphasis on appeals to the federal Circuit Courts of Appeals, appeals before the Board of Immigration Appeals and the AAO and litigating immigration issues in the federal courts. Matthew also consults with other attorneys on appellate strategy and brief-writing on a contract basis.

Matthew is a native Kansan and graduated from Salina Central High School. He studied philosophy at Kansas State University and obtained his law degree from the University of Kansas.

Education

- J.D. University of Kansas, 2008
- BA Kansas State University, Philosophy, 2005
- Admitted to Practice by the State of Kansas
- U.S. District Court for the District of Kansas and the Western District of Missouri
- Circuit Courts of Appeals for the Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Tenth, and Eleventh Circuits.
- Admitted to practice before the U.S. Supreme Court

Professional Recognition

- Selected to “SuperLawyers” Rising Stars each year since 2012
- Member, American Immigration Lawyers Association (AILA)

- Chair-Elect, Kansas/Missouri AILA Chapter,
- Member, AILA Litigation Section Steering Committee
- Past-President, Immigration Law Section of the Kansas Bar Association

Publications and Seminars

"Litigating Immigration Cases in Federal Court" CLE for Kansas and Missouri Chapter of American Immigration Lawyers Association (2015)

"Federal Litigation for Immigration Attorneys" – AILA Omaha Chapter Conference (2014)

"Particular Social Groups after Matter of MEVG and Matter of WGR," CLE for Kansas and Missouri Chapter of American Immigration Lawyers Association (2014)

"Best Practices in Stays of Removal and Filing Form I-246" CLE for Kansas and Missouri Chapter of American Immigration Lawyers Association (2013)

"Witness Protection & UN Convention Against Transnational Organized Crime" CLE Sponsored by American Immigration Lawyers Association (2012)

"Asylum, VAWA, and U Visas," CLE Sponsored by Husch Blackwell (2011) "Forgotten Social Groups," 4 J. Migration & Refugee Issues 126 (2008)



In the News:



“For more than two decades, Sigifredo Saldana Iracheta, 49, insisted he was a US citizen, repeatedly explaining to immigration officials that he was born to an American father and a Mexican mother in a city just south of the Texas border ... In rejecting Saldana’s bid for citizenship, the government sought to apply an old law that cited Article 314 of the Mexican Constitution, which supposedly dealt with legitimizing out-of-wedlock births. But there was a problem: The Mexican Constitution has no such article.

The error appears to have originated in 1978, and it has been repeated since, frustrating an untold number of people who are entitled to US citizenship but could not get it.

“What this looks like is nobody’s ever checked it out. And it is shocking,” said Matthew Hoppock, a Kansas City lawyer who specializes in appeals related to immigration issues.”

The Boston Globe



“We don’t dispute that he has a final order of removal,” Hoppock said. “And we don’t dispute that legally they have the right to deport him if they want to. But doing so, before getting an answer on DAPA, is highly contrary to the president’s public statements.”

The final order for removal remained in place Friday, and it is difficult for his family to accept.

“He’s trying to lead a life like all of us here,” said Jimenez, his niece. “I don’t think it (deporting) is right for people who want to do better here. Take the people who are doing bad things here.”

The Kansas City Star



“Although we had hoped the court would permit review of the way the USCIS has implemented the Adam Walsh Act to separate families in a way contrary to the statute, the Eighth Circuit agreed with us that the statute might not even apply to the visa petitions at

issue here,” he said. “As we had argued, the statute only limits the filing of a visa petition when the visa petitioner has a specific conviction. Our clients’ visa petitions had already been filed and receipted by the USCIS.”

Now that the Eighth Circuit has agreed that the courts have jurisdiction to review this specific issue, Hoppock said they will take it back to the district court.

“If the statute is read as worded, hopefully our clients will be able to have the visa petition approved and can remain together as a married couple,” he said.

Law 360

Set up a Consultation

If you would like to schedule a consultation with Matthew Hoppock, please call our office or click the button below.

Contact us

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Shawnee, KS 66203
Phone: 913-267-5511
Fax: 913-562-9555
matthew@hoppocklawfirm.com
Terms and Conditions

Exhibit G

DECLARATION OF JORGE E. ARTIEDA

I, Jorge E. Artieda, declare as follows under penalty of perjury pursuant to 28 U.S.C. § 1746:

I. PROFESSIONAL BACKGROUND AND QUALIFICATIONS

1. I am an attorney licensed to practice law in the Commonwealth of Virginia and am admitted to practice before the United States District Courts for the Eastern and Western Districts of Virginia.

2. I have over two decades of experience in immigration law and federal law enforcement, including:

a. Service as a prosecutor in New York City;

b. Service as legal counsel to Immigration and Customs Enforcement (ICE) Headquarters in Washington, D.C.;

c. Service as Assistant Chief Counsel for ICE in Virginia;

d. Service as a Special Assistant United States Attorney in Virginia; and

e. For the past decade, private practice as an immigration attorney specializing in detention and removal defense, including routine representation of detained individuals in bond proceedings before Immigration Judges in the Eastern District of Virginia.

3. I am proud of my years of service as a government attorney. My time working within the City of New York, Immigration and Customs Enforcement, and as a federal prosecutor was among the most meaningful work of my career. I remain grateful for the opportunity to have served the public in those capacities and continue to hold deep respect for the dedicated public servants who work within these institutions to faithfully administer our immigration laws.

4. Based on this extensive experience on both sides of immigration enforcement and litigation, I am intimately familiar with the standards, practices, and norms governing bond determinations in immigration proceedings in this district.

II. PURPOSE OF THIS DECLARATION

5. I submit this declaration to provide the Court with direct, firsthand observations of a dramatic and systematic change in bond hearing outcomes that have occurred over the past three weeks in immigration proceedings in Virginia and Maryland, particularly before Immigration Judges assigned to the detained docket.

6. This declaration is based on: (a) my personal observations of bond hearings I have attended; (b) my review of written bond decisions issued to clients; (c) communications with numerous immigration attorneys practicing in this district; and (d) my professional knowledge of historical bond practices in this jurisdiction spanning more than a decade.

7. I authorize any attorney representing detained individuals in habeas corpus proceedings or emergency motions for immediate release to use and file this declaration in support of their clients' cases.

III. THE SEISMIC SHIFT: SYSTEMATIC DENIAL OF BOND IN POST-HABEAS CASES

8. Beginning in or around the first week of January 2026, I began observing what can only be described as a seismic shift in bond hearing outcomes for individuals who had been granted federal habeas relief and ordered § 1226(a) bond hearings by this Court and other judges in the Eastern District of Virginia.

9. Prior to this shift, while bond amounts had increased in recent months, bond was *routinely granted* in post-habeas cases where individuals demonstrated: (a) lack of significant criminal history; (b) strong family ties in the United States; (c) lengthy residence in the country; (d) viable claims for relief from removal; and (e) community support including stable housing and employment prospects.

10. Beginning approximately three weeks ago, this pattern *abruptly and uniformly ceased*. In numerous cases I have personally observed or learned about from colleagues, Immigration Judges have denied bond in circumstances that, weeks earlier, would have resulted in bond being set.

11. In my professional observation, the consistency, timing, and uniformity of these denials cannot be readily explained by coincidence, changes in individual case facts, or independent judicial decision-making. The pattern appears systematic and suggests coordinated institutional direction.

IV. THE REASSIGNMENT OF IMMIGRATION JUDGES CHOI AND DONOSO-STEVENSON

12. What I believe to be compelling evidence of possible institutional coordination occurred in early January 2026, when two Immigration Judges who had been assigned to the Annandale detained docket for years—Immigration Judge Raphael Choi and Immigration Judge Karen Donoso-Stevens—were abruptly reassigned to the non-detained docket.

13. Prior to their reassignment from the detained docket, these judges were conducting what appeared to be meaningful individualized bond assessments in

post-habeas cases. They were granting bond in appropriate cases and, critically, had begun questioning—*on the record*—the government's blanket detention positions and the Department of Justice's insistence on maintaining detention under circumstances that appeared not to justify continued custody.

14. The timing and circumstances of their reassignment are, in my view, extraordinary. Judges who appeared to be fulfilling their duty to conduct individualized bond assessments and who were openly questioning government positions were removed from the very docket where such assessments are most critical.

15. Since their reassignment, the Immigration Judges who replaced them on the detained docket have, based on my observations, *systematically denied bond* in post-habeas cases. This pattern suggests that the reassignment may not have been administrative happenstance but rather a deliberate effort to ensure predetermined outcomes—continued detention—regardless of individual circumstances.

V. PRETEXTUAL AND LEGALLY INSUFFICIENT RATIONALES FOR DENYING BOND

16. Over the past three weeks, Immigration Judges have, in my observation, relied on a remarkably narrow and predictable set of rationales to deny bond—rationales that appear to bear little relationship to genuine individualized risk assessment and that would not have been deemed sufficient to justify denial just weeks earlier.

17. These rationales, which I believe to be pretextual, include but are not limited to:

- a. Treating the absence of a financial sponsor as dispositive of flight risk, even when other equities (family ties, length of residence, employment history, community support) overwhelmingly favor release;
- b. Finding that a sponsor who is not a *financial* sponsor is insufficient, despite no legal requirement that sponsors provide financial guarantees;
- c. Treating the fact that an individual did not seek relief from removal until after being detained as evidence of lack of intent to comply with immigration proceedings;
- d. Finding that applications for relief under INA § 240A(b) (cancellation of removal) are "speculative" and therefore do not mitigate flight risk, despite the fact that all immigration relief applications involve some degree of uncertainty and merit assessment;

e. Characterizing unlawful entry into the United States—*by itself*—as establishing flight risk, a rationale that would render bond impossible for the vast majority of detained individuals;

f. Treating the accumulation of unlawful presence (which is a civil violation, not a crime) as evidence of danger or disregard for the law;

g. Finding that unauthorized employment—a status violation shared by millions of undocumented immigrants—constitutes a significant negative factor warranting denial of bond;

h. Treating minor discrepancies in addresses listed on various documents as evidence of "deceitfulness," even when such discrepancies are readily explained and do not reflect any intent to mislead;

i. Questioning the accuracy of tax returns and suggesting "underreporting" based on subjective assessments of lifestyle (such as photographs showing children at Disneyland or a respondent in a vehicle), without any actual evidence of fraud or misrepresentation;

j. Imposing on respondents the burden of proving that they *will* appear for future court proceedings—an impossible burden that requires proving a negative—even though many respondents have never failed to appear for any prior proceeding because *they have never been required to appear* until being placed in removal proceedings; and

k. Dismissing applications for cancellation of removal as "pro forma" when they have not been fully completed or developed, even though detained individuals often lack access to the resources and legal support necessary to perfect such applications while in custody.

18. In my professional assessment, these rationales do not appear to be grounded in legitimate risk assessment. They appear to be pretexts designed to ensure denial of bond regardless of the individual facts of each case.

19. The rationales being employed to deny bond appear to depart significantly from the standards articulated in BIA precedent governing bond determinations.

20. The rationales I have observed over the past three weeks—treating unlawful entry alone as establishing flight risk, dismissing relief applications as inherently "speculative," requiring financial sponsorship as a prerequisite, and treating any immigration violation as dispositive—appear to represent a departure from these precedential standards. BIA case law requires that Immigration Judges consider the *specific circumstances* of each case and weigh multiple factors in reaching bond

determinations. The systematic application of categorical exclusions based on status violations common to the detained population does not appear consistent with the individualized, fact-specific analysis that BIA precedent mandates.

VI. OBSERVATIONS FROM JANUARY 14 and JANUARY 28, 2026, DETENTION DOCKET

21. On January 14 and January 28, 2026, I personally observed bond hearings before Immigration Judge Gardey at the Annandale Immigration Court. What I witnessed confirmed the systematic pattern of denial that has emerged over the past three weeks.

22. Multiple cases that would have resulted in bond being set just weeks earlier were denied. The denials were based on the same rationales I have described above: lack of financial sponsors, unauthorized work, the "speculative" nature of relief applications, and immigration violations that are endemic to the detained population.

23. In each instance I observed, the Immigration Judge appeared to apply factors that, if consistently applied, would make bond impossible for virtually any detained individual in removal proceedings. There did not appear to be meaningful individualized assessment. The hearings appeared to be perfunctory exercises designed to create a veneer of due process while ensuring predetermined outcomes.

24. The cases I observed on the above dates, involved individuals with no criminal history, or only minor criminal history unrelated to violence or flight. These individuals had family members present in court, stable housing, employment prospects, and pending applications for relief. Under the standards that prevailed in this district for years—and indeed, as recently as three weeks ago—these individuals would have been granted bond.

VII. CORROBORATION FROM THE IMMIGRATION LEGAL COMMUNITY

25. My observations are not isolated. In recent weeks, I have communicated with numerous immigration attorneys practicing all over the United States who handle detention cases. These conversations have confirmed that the pattern I have observed is widespread and consistent.

26. Colleagues have reported the same experience: clients who were granted federal habeas relief and ordered § 1226(a) bond hearings are now being systematically denied bond based on rationales that would not have been deemed sufficient weeks earlier.

27. These attorneys have described bond hearings as appearing to be "pro forma" exercises where the outcome seems predetermined. Meaningful individualized

review appears to have been replaced by boilerplate language and cookie-cutter denials.

28. The consistency of these reports across multiple practitioners, representing different clients before different Immigration Judges, suggests that this is not a matter of individual judicial discretion or case-specific circumstances. It appears to be a coordinated institutional effort.

VIII. PROFESSIONAL ASSESSMENT AND CONCLUSION

29. Based on my two decades of experience in immigration law, including my service within the ICE, the pattern of events over the past three weeks—the abrupt reassignment of judges who were granting bond and questioning government positions, the immediate and uniform shift to systematic denial of bond, and the reliance on a narrow set of rationales across multiple judges and cases—suggests what appears to be a coordinated effort by the Executive Office for Immigration Review (EOIR) and the Department of Justice to undermine federal habeas relief.

30. In my professional judgment, this apparent coordination is the most plausible explanation for what I and my colleagues have observed. Independent adjudication does not typically produce this level of uniformity in outcome and reasoning across multiple judges and cases in such a compressed timeframe.

31. The bond hearings being provided to individuals who have been granted federal habeas relief do not appear to be genuine adjudications. They appear to be illusory remedies—proceedings designed to create the appearance of due process while ensuring that individuals remain detained indefinitely.

32. What I have witnessed over the past three weeks appears to be a systematic effort to nullify the constitutional protections that federal courts have recognized and enforced through habeas corpus. It appears to be a deliberate campaign to render meaningless the bond hearings that this Court and others have ordered.

33. I am profoundly concerned by what I have witnessed. As an attorney who has dedicated my career to the fair administration of immigration law—having served both as a government attorney enforcing those laws and as a private practitioner defending individuals subject to them—I find what appears to be a coordinated effort to undermine judicial authority and deny due process to be deeply troubling and inconsistent with the values I learned and embraced during my years of public service.

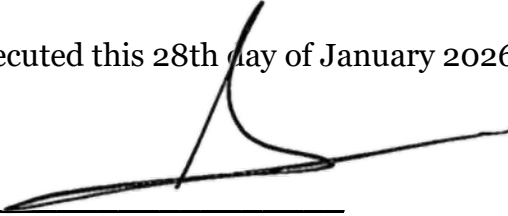
34. The individuals affected by this systematic denial of bond are not abstractions. They are human beings with families, with children, with jobs, with lives in this country. They have been found by federal courts to be entitled to bond hearings.

They are now being denied those hearings in any meaningful sense, held in detention not because they pose a danger or a flight risk, but because, in my observation, the Executive Branch appears to have decided to circumvent federal court orders through institutional means.

35. I submit this declaration in the hope that it will assist courts in understanding the reality of what appears to be occurring in immigration proceedings in this district and in ensuring that the constitutional right to habeas corpus is not rendered meaningless.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 28th day of January 2026, in Arlington, Virginia.

A handwritten signature in black ink, appearing to read 'Jorge E. Artieda', written over a horizontal line.

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