

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ANGEL PANTOJA SAUCE,

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-1532

PETITIONER'S STATUS REPORT

Petitioner, Angel Pantoja Sauce, through undersigned counsel, respectfully submits the instant status report as a supplement to the joint status report filed by the parties on March 30, 2026. 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. 4. 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 fifteen minutes. Petitioner's counsel argued all of the factors under *Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006), and addressed ICE's criminal and immigration concerns regarding danger to the community. 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.

On flight risk, Petitioner provided evidence of his presence in the country for twenty years, three (3) United States Citizen (USC) children, and one (1) USC grandchild. Additionally, evidence was presented detailing Petitioner's work history, tax returns, home ownership, and *extensive documentation* evidencing Petitioner's clear ties to the United States. Petitioner has a fixed address in Philadelphia, where he owns his own home, with his wife and daughters. Despite the foregoing evidence, the Immigration Judge stated that Petitioner had not developed close enough ties to the United States to ensure that *no reasonable bond* could be set to ensure his attendance at any future immigration hearings.

On danger, the Immigration Judge focused on two recent charges originally charged as shoplifting. The first charge, from 2023, was downgraded to loitering – which Petitioner pled guilty to. *See* Exh. A - Tab FF. Petitioner clarified that this charge originated when he was in a Macy's and did not realize that he had walked into an area of the store that was off limits. The second offense, from 2025, was dismissed and expunged from Petitioner's record entirely. *Id.* Petitioner explained that this charge originated when he paid for his items at a self-checkout, but the police arrested him due to an issue scanning of one of the labels. Petitioner completed community service and participated in the summary diversion program with the Philadelphia DA's office.

Despite the evidence establishing that Petitioner had an otherwise spotless record for twenty years, in addition to the reasonable explanations of Petitioner and the downgraded charges Petitioner pled guilty to in 2023, the Immigration Judge asserted that Petitioner was a “danger to

property” and determined that Petitioner was ineligible for bond.

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 “[Petitioner] has not established that he is not a danger to the community and that he is not a flight risk.” *See* Exh. B.

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 400 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, USC family, 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). 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

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>).

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

Exhibit B: Immigration Judge’s Bond Decision

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),

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.

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.

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

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.”).

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 26, 2026

s/Conor Deane

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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:)
)
PANTOJA SAUCE, Angel)
)
Respondent)
_____)

File No: 

In Bond Proceedings

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

Judge: Hon. Tamar Wilson

Next Hearing (Custody): March 23, 2026 at 9:00 AM

EVIDENCE ADDRESSING FLIGHT RISK: Work and Fixed Address History

H.	Respondent's Property Insurance Documents, demonstrating home ownership and a fixed address at [REDACTED]	37-76
I.	Respondent's Property Deed, demonstrating home ownership and a fixed address at [REDACTED]	77-80
J.	Respondent's Home Appraisal Report, demonstrating home ownership and a fixed address at [REDACTED]	81-128
K.	Respondent's 2024 Tax Return	129-144
L.	Respondent's 2023 Tax Return	145-157
M.	Respondent's 2022 Tax Return	158-175
N.	Respondent's 2021 Tax Return	176-194
O.	Respondent's 2020 Tax Return	195-202
P.	Respondent's paystubs, dated from 01/31/26 to 03/07/26, demonstrating Respondent is currently employed at [REDACTED] in Philadelphia, Pennsylvania	203-206

EVIDENCE ADDRESSING FLIGHT RISK: Family and Community Ties in the United States

Q.	Respondent's Wife Anayeli Demetrio Meneses's Mexican Passport	207
R.	Respondent's Religious Marriage Certificate with Anayeli Demetrio Meneses	208
S.	Respondent's USC Daughter (Age 20) Stephanie Pantoja Demetrio's Birth Certificate	209
T.	Respondent's USC Daughter Stephanie Pantoja Demetrio's Academic Certificate of Excellence	210
U.	Respondent's USC Daughter Stephanie Pantoja Demetrio's Certificate of Perfect Attendance	211
V.	Respondent's USC Daughter Stephanie Pantoja Demetrio's University of Pennsylvania Academic Transcript	212

W.	Respondent's USC Daughter (Age 18) Melanie Pantoja Demetrio's Birth Certificate.pdf	213
X.	Respondent's USC Daughter Melanie Pantoja Demetrio's U.S. Passport	214
Y.	Respondent's USC Daughter Melanie Pantoja Demetrio's High School Diploma	215
Z.	Respondent's USC Daughter Melanie Pantoja Demetrio's Honor Roll Certificate	216
AA.	Respondent's USC Daughter (Age 16) E [REDACTED] Birth Certificate	217
BB.	Respondent's USC Son (Age 1) S [REDACTED] Birth Certificate	218
CC.	Respondent's Photos with Family, Friends and Community Members, demonstrating strong community ties in the United States	219-252

EVIDENCE ADDRESSING DANGER TO COMMUNITY & THREAT TO NATIONAL SECURITY: Letters of Support Attesting to Respondent's Good Moral Character

DD.	1) Eric Meneses-Munoz, Respondent's USC cousin-in-law Kristie Marmo, Respondent's Relative	253-285
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- Angel has always been an exceptional person. He has raised 3 awesome girls, Stephanie, Melanie, and E [REDACTED]. He is a very hard-working, loving, dedicated, and caring dad and husband and has provided an excellent quality of life for his daughters, his wife, and his new grandson, S [REDACTED] Melanie's son. He is a very responsible man who has been an honest, reliable, and trustworthy employee in all the jobs that he has worked.
- Angel is a community leader, attending and supporting church events, retreats and helping people in tough times and those in need. He is a kind, funny, and joyous person who has always been active in sports organizations. He has always strived to encourage friends and kids to practice soccer, maintain fields, organize tournaments, and help those who might not have the resources to afford uniforms or transportation. Ensuring that they were never left out. He provides an outstanding example of an exemplary person.

- If Angel were not able to stay in this country, which has been his home for so many years, it would be detrimental for his wife, daughters, and grandchildren who depend on him. He is the primary provider of the family's wellbeing. His contribution ensures the payment of mortgage, food, clothing, school, doctors, and transportation.

2) Kristie Marmo, *Respondent's USC Relative*

- It would be devastating for Angel's wife and children if they were separated. His wife, Anayeli, already works, but her income is not enough to support herself, the two children in the home, and their new grandbaby. Without Angel's contribution, she would be expected to dramatically increase her work hours just to keep the household afloat. Doing so would come at a steep cost: less time with the children, reduced ability to provide emotional support, and a significant loss of the hands-on care she currently gives to the baby. This sudden loss would force Anayeli to shoulder responsibilities that were never meant to fall on one person alone.
- Beyond the financial strain, the emotional impact on this family would be deeply felt. I have seen firsthand how much the children rely on Angel's steady presence for comfort, guidance, and a sense of safety. Losing that daily connection would be confusing and heartbreaking for them. And for Anayeli, the burden would be overwhelming. She is a devoted mother and grandmother but asking her to manage the household alone, while working more hours just to keep up, would stretch her beyond what any one person should have to carry. The stress of trying to meet everyone's needs at once would disrupt the routines and stability that have grounded these children since birth. In my experience with this family, Angel's absence would not just create hardship - it would fundamentally shake the emotional foundation they depend on.

3) Pedro Pina-Santiago, *Respondent's USC Relative*

- I've known Angel for more than 2 years and from those 2 years that I've met him he has always been a very good and a proud father. He always takes his daughters in consideration and has been with them for every step in their lives. He's also been very supportive by taking in my brother and helping him and my sister in law with the process of having a family. I now have a nephew

who Angel loves dearly and always makes sure that he's well fed and taken care of. He has a very crucial role in the babies life and has helped me numerous times with taking care of the infant, besides a very hard worker and admire his role as a father and I know many people in our community also knows how much of a great father Angel Pantoja is.

4) Hosmani Perez-Demitrio, *Respondent's USC Niece*

- Angel Pantoja is like a second father to me. He's always there to support me, friends and family. No hesitation. I have lived in the same household with my uncle for many years and he's always been a good father to my cousins. He's an amazing husband to my aunt. He's always working and always willing to help others with work. Angel is a very hard working person finding side hustles for money and keeping his main job for many years. He's even had enough time to even be my soccer coach at one point in my life. Even now with me being 22, he always comes out to support my friends and I. He's been a staple piece in my life and to many others just for the great memories he's given us. He's been a huge part of my life. Never a dull moment and always there to give me advice and support. He goes to church as well and helps volunteer in a small group for a religious figure. Doesn't actively go and create problems anywhere but instead is always trying to do the right thing and solve issues. Whether that's family matters or friends, he's always there to give advice and be there for support.
- My aunt and cousins would face tremendous hardship with the separation of my uncle. Seeing my family like this right now is one of the hardest things for me. I can't ever imagine my aunt and cousins not having my uncle here. He's the glue to that family. Especially since he now has a grandchild. He helps provide the supplies and needs for the family. He's obviously been a very good role model with 3 daughters with good education. One of them is in college at the University of Pennsylvania, one is a sophomore in high school, and the other is going to be in college sometime soon. The whole family is distraught with the news of my uncle. He's not a bad person at all. He's loved and wanted by many.

5) Angelo C Morelli, *Respondent's USC Friend*

- I have always known Angel to be an honest, hard working, law abiding individual who loves his family immensely. He cares deeply about them and always puts his family first. He is selfless

and always one of the first to help family and friends in their time of need. Angel is the type of person who represents the fabric of our society. He epitomize the type of people who came to America to seek a better life for himself and his family. These are the people who built America to become the greatest nation on earth and the envy of the rest of the world.

- His family would be absolutely devastated if they lost their father and husband on whom they depend on not just for material goods but the love he shows them each day and the example he sets for his children to be good Americans. He is the "salt of the earth". America needs more Angels like him. As a grandson of immigrants, I urge your honor to return Angel to his family and allow him the opportunity to continue building America.

6) Ricky John, *Respondent's USC Friend*

- My name is Ricky John, born [REDACTED] in Trinidad and became a US citizen in 2008. My contact information is above. I am a friend of Angel Pantoja and his wife Ana.
- I have played soccer with Ana and Angel for years. They are kind, hardworking, and community oriented. Angel is a loving father, husband, and friend. Angel and Ana organized our soccer team and created a fun and fair playing environment. I have played on many teams with many people and Angel and Ana created one of my favorites. They did this by being organized and competent leaders and by being calm, fair, and fun. They created an environment that was friendly and enjoyable. They bring this same energy in all their endeavors.
- Angel is hardworking and family oriented. Without Angel, his family will suffer hardship. They have 3 children and their first grandchild is less than 1 year old. They have a mortgage and two daughters in college. They have rehabbed their entire home for their family and their new grandchild. Angel is the primary bread winner for the family. Their ability to stay in their home and support their children and grandchild is dependent on Angel's income. He has a steady job that he has kept for many years. Angel is a pillar of his family and his community. He is someone who makes our world better.

7) Sarah Wenger, *Respondent's USC Friend*

- I have played soccer with Ana and Angel for years. They are kind, hardworking, and community oriented. Angel is a loving father, husband, and friend. Angel and Ana organized our soccer team and created a fun and fair playing environment. I have played on many teams with many people and Angel and Ana created one of my favorites. They did this by being organized and competent leaders and by being calm, fair, and fun. They created an environment that was friendly and enjoyable. They bring this same energy in all their endeavors.
- Angel is hardworking and family oriented. Without Angel, his family will suffer hardship. They have 3 children and their first grandchild is less than 1 year old. They have a mortgage and two daughters in college. They have rehabbed their entire home for their family and their new grandchild. Angel is the primary bread winner for the family. Their ability to stay in their home and support their children and grandchild is dependent on Angel's income. He has a steady job that he has kept for many years. Angel is a pillar of his family and his community. He is someone who makes our world better.

8) Perri Shaw Borish Letter, *Respondent's USC Family Friend*

- During the time that I have known Ángel, I have come to know him as a person of strong character, honesty, and dedication to his family and community. He is a very hardworking man and has maintained steady employment at ██████████ ██████████ in Philadelphia. Ángel takes great pride in his work and shows up every day ready to do his job and support his family. Over the 26 years that he has lived in the United States, he has built a stable life through his work ethic and commitment to those around him.
- Ángel is also known as a very kind, calm, and respectful person. He treats others with generosity and compassion and is always willing to help his friends and neighbors whenever they need support. He is someone who does not cause trouble for anyone and instead contributes positively to the people and community around him.
- Ángel is a devoted father of three children and plays a very important role in their lives. In addition, he recently became a grandfather, and his 6-month-old grandson is deeply dependent on him. Ángel helps support and care for his family both

emotionally and financially. His presence provides stability and guidance to his children and now to his growing family.

9) Angelique Piccirilli, *Respondent's USC Family Friend*

- I had the pleasure of meeting Angel and his family through his daughter, [REDACTED] and my daughter, [REDACTED]. The girls met last year as friends, they attend [REDACTED]. The two young [REDACTED] Both, very respectful, ambitious and silly. When I met Angel and the rest of his family, I immediately recognized specific traits [REDACTED] exuded. She is being raised in a loving, goal driven, respectful, responsible manner. She exudes confidence and because of Angel and her mother, she takes pride in her culture. Having been an educator for two decades, I've had a couple hundred students that I worked with. In today's society, it can be very difficult raising children. Angel and his wife look as if to do it with ease. Why? Because of the characters they model for their girls. Angel has worked in the hospitality field for many, many years. He is a fixture at [REDACTED] as he is the manager. He has gotten to know the regulars and always introduces himself to the newbies. He works hard for his family. If there was ever a bad day, you wouldn't know it because his smile and kindness overshadowed everything else.

10) Ether Santiago, *Respondent's Friend*

- Angel is a dedicated husband and father to his wife and their three daughters. He consistently works hard to provide for his family and ensure they have the support and opportunities they need to succeed. I have personally witnessed how committed he is to being a responsible parent and positive role model for his children.
- In addition to supporting his family, Angel values education and personal growth. He is currently attending school and working toward improving his future so he can better provide for his loved ones. His determination to better himself and create a stable life for his family is truly admirable.
- From my experience knowing him, Angel is respectful, dependable, and always willing to help others. He treats people with kindness and integrity and is someone his family and community rely on.

- Separating Angel from his family would cause significant hardship to his wife and three daughters who depend on him emotionally and financially. I sincerely believe he is a good person who deserves the opportunity to remain with his family and continue contributing positively to his community.

11) Attia Marchaman, *Respondent's USC Neighbor*

- As neighbors, we would see one another in passing either headed to work or in the evening returning home from work. At times, on the weekends I'd see Angel heading out with the family for the day, and vice versa. I recall one Saturday bumping into Angel, and his family over at the Cherry Hill mall where he'd been shopping just as I was with my children. We stopped, and shared a moment jokingly saying that we worked hard for our children to spend our money which we had no problem with given he, like myself, was raising great kids.
- Over the years, Angel and I were not only neighbors, but also became close friends realizing that we shared a lot of things in common ! Both hard working, and most importantly honestly, genuinely committed to being great parents!
- As a neighbor Angel was willing to do whatever he could for not only myself during a very difficult time for me, but for each and every neighbor on the block, and in the community. One of the things that I admired most about Angel was the love and respect he so openly displayed for his wife. Honestly, it was something that I've desired and honestly thought I'd had in my marriage.
- Recently, Angel became a grandfather, he was so supportive to his daughter during her pregnancy and was literally stoked the day she gave birth. Both Angel and his wife! Except when working when you saw Angel, you'd see his wife. For his wife to be without Angel would be very difficult on not only her, but their daughters, and grandson as well given he's played such a major part in their lives !!!! VERY ACTIVE !!!! This would definitely cause nothing short of a hardship on all as Angel is the bread winner in the home.

12) Yael Tacher, *Respondent's Neighbor*

- Although we are not close friends, our interactions over the years have allowed me to observe his character and the way he treats those around him. He never fails to greet my family and me with kindness, and he has always conducted himself as a considerate and responsible member of our community.
- Angel is also a devoted father to his three daughters, two of whom are in college and one in high school. It is clear how much he cares for his family and how hard he works to support them.

He holds two jobs to provide for his children, and his dedication to their well-being is evident to anyone who knows him.

- In my experience, Angel is a person of integrity, commitment, and strong moral character. I believe he contributes positively to those around him and to our community as a whole. I truly hope that this letter helps provide a fuller picture of the man I have known these past four years.

13) Carleton Gholz, *Respondent's USC Neighbor*

- I am writing today regarding my Manton Street neighbor, Angel Pantoja, who has been detained by ICE. Angel is a family man, working hard at two jobs, and together with his wife, Anayeli, raising three wonderful daughters, Stephanie, Melanie, and E [REDACTED] Stephanie and Melanie are in college—Stephanie at the prestigious and selective University of Pennsylvania—and E [REDACTED] still in high school, which means this is a critical time for his family. Besides tearing a family apart, this detainment puts Angel's family's livelihood and his daughters' educations at risk, and his loss is already felt by our neighbors. This is a self-sufficient and honest family who embodies what it is to be a hardworking American.

14) Ceylan Akturk, *Respondent's USC Neighbor*

- I am writing today regarding my Manton Street neighbor, Angel Pantoja, who has been detained by ICE. Angel is a family man, working hard at two jobs, and together with his wife, Anayeli, raising three wonderful daughters, Stephanie, Melanie, and E [REDACTED] Stephanie and Melanie are in college—Stephanie at the prestigious and selective University of Pennsylvania—and E [REDACTED] still in high school, which means this is a critical time for his family. Besides tearing a family apart, this detainment puts Angel's family's livelihood and his daughters' educations at risk, and his loss is already felt by our neighbors. This is a self-sufficient and honest family who embodies what it is to be a hardworking American.

15) Joshua Hernandez, *Respondent's Neighbor*

- From my experience and what I have personally seen, Angel has always shown strong character and generosity toward others. I know of situations where some kids' parents could not afford soccer uniforms, and Angel stepped in to help provide them so those kids could still participate and feel included. That kind of generosity shows the type of person he truly is. He has always

been a very down-to-earth and respectful person, and I have never personally seen him involved in any issues. His good values are also reflected in his family, as his daughters are very respectful and kind. Angel would regularly come out to support me and my soccer teammates by watching our games. He was always cheering us on, motivating us to do our best, and encouraging us to keep pushing even when we were losing or feeling discouraged. His support and positive influence meant a lot to many of us growing up.

16) Michelle Histan, *Respondent's USC Neighbor*

- In South Philadelphia, my neighbor is Angel Pantoja. Angel lives around the corner with his wife and three daughters. He is part of what makes our neighborhood great. Angel is a kind person, who always has a smile for anyone in the neighborhood and says hello to my dog if he sees us walking. Angel works two jobs so he can provide for his girls, and he contributes to our community in that way.
- Angel has two daughters in college and one in high school. The financial toll of losing Angel will be devastating to their family as college costs continue to rise. The emotional toll will be even greater, as the girls depend on their father.

17) Adam Cross, *Respondent's USC Neighbor*

- I've lived directly within Philadelphia for the past seven years and Pennsylvania the past twelve, and out of all the neighbors and neighborhoods I've been in, I can honestly say that Angel is friendliest and most welcoming neighbor I've ever had. I've always known I could count on Angel for any help should I need it—he would always welcome me with a smile and a friendly word, always courteous and conscientious to those around him. He was always doing me favors and splitting community care, such as shoveling snow and protecting each other's packages. I know that Angel is also a very hard worker, working multiple jobs to support his family and put his daughters through college with hours above and beyond the average American. He's an exemplary person that anyone within our community would do well to look up to.

18) Fernando Trevino-Martinez, *Respondent's USC Neighbor*

- Angel has been a great neighbor since my family moved into the neighborhood four years ago. He was very welcoming and cordial, and always shown great character while dealing with the normal day-to-day interactions of the neighborhood. One day, an

older lady that lives around the corner from his house challenged him about a street parking spot. Angel, of course, was right and even when the individual was rude and used offensive language, he was able to deescalate the confrontation in matter of minutes. He was courteous, patient, and respectful.

- He works very hard in two jobs to support his family and to provide a good education for his children. He is a decent human being taking the necessary steps to achieve the American dream for his family.
- Angel and I are not close friends. I don't have all the details of how this separation could affect his family. However, based on my many years of experience working with my community on behalf of the City of Philadelphia and the Commonwealth of Pennsylvania, I have seen first-hand the terrible impact and hardship that other families have faced when separated. I have no doubt that Angel's family will be tremendously affected as well.


19) Adina Goldstein, *Respondent's Daughter's Former Teacher*

- Because my relationship with Angel began as a result of my relationship with his daughters, I've had the honor of seeing what a dedicated father he has been to all three of his daughters. One only has to look at his daughters' accomplishments and they will find that Angel's dedication to his family bolsters so much of this. His eldest daughter, Stephanie, is a sophomore at the University of Pennsylvania, my alma mater, and an internationally respected school with a 4% acceptance rate. Angel has masterfully nurtured Stephanie's intellectual capabilities and curiosity. He has created a safe, loving and brave environment that encourages Stephanie to explore varying interests and persevere through obstacles. Angel has made himself available at every parent-teacher conference, every school event, and has dedicated significant time and resources to allowing Stephanie to become the strong young woman that she is today.
- He has devoted himself in this way to all three of his daughters, who have always been exceptional. All three have attended selective admissions high schools in Philadelphia, which require not only the highest grades and test scores, but the utmost dedication to school. Gaining entrance to Philadelphia's selective admissions high schools requires 95% or higher attendance rates. As any parent or teacher can tell you, supporting student attendance is a major barrier to educational achievement in the School District of Philadelphia, and it truly takes a village to ensure that students are present, on time, and prepared for the day ahead, every day. Angel's commitment to

his daughters' schooling is unparalleled. Since we met in 2018, he has never missed a parent-teacher conference, a school event, or a sporting event any of them have played in.

- He also extends his care far beyond his own children. One of the great honors of being a teacher is when your students invite you into their lives outside of school, to see them thrive outside of essays and exams. In 2020, a number of students invited me to come see them play in a soccer game in a local, South Philadelphia youth league. None of Angel's daughters were in my class at the time. When I arrived at the game to see other students play, I was heartened, though not surprised, to see Angel there, coaching the team through their warm ups. This is a clear example of the ways that he is an important fixture of the community, even beyond the support that he gives to his own daughters.
- Separating the Pantoja-Demetrio family would greatly jeopardize the stability of the entire family. Not only would separating Angel from his family present incredible emotional challenges (especially given that his youngest daughter is still a minor), but it would also present significant financial hardship that would impact the entire family. With two daughters in college and one diligently working to join them in pursuing a college education in just a few years, Angel's family needs him emotionally and financially. Having taught his exceptionally gifted, kind, and ambitious children, I believe it is of the utmost importance that their potential be nurtured in further schooling - an opportunity that would become increasingly difficult to sustain without Angel.

20) Lara Rhame and Josh Spivak, *USC Patrons of Respondent's Place of Employment*

- We have known Angel Pantoja Sauce and his family for four years. We met through his wife and children. Angel loves cooking and works at our favorite cheesesteak restaurant,  He bonded with my husband over their shared love of cooking. Angel has no criminal record and has no arrest record. He works hard and always has a smile on his face. He is a strong example of a family man. The success of his children is a testament to how well he cares for them and leads his family. His older daughter was class President at Academy at Palumbo, our neighborhood high school, where many of our friends attend. She was able to attend college at the University of Pennsylvania, a reflection of having a good example as a father. Angel is a strong community member and he and his family have purchased a home, of which they take excellent care.

- Angel's family will face severe hardship if he is deported. Angel's job pays the mortgage on their home. Angel still has two younger daughters living at home. Should he be deported, they risk losing their home and along with their Mother, Ana, Angel's children are good students. Moving will cause significant disruption to their studies and their academic progress.


21) Rebecca Weinberg-Femia, *Respondent's USC Acquaintance*

- I have always known Ángel to be a kind person, wonderful father and grandfather, and hard worker. I understand him to be a valued employee at [REDACTED] in South Philadelphia. His young grandchildren are dependent on Ángel for his support, both emotional and financial. For him to be separated from his family would not just be an emotional hardship for them, it would also severely strain them financially.
- Ángel has been in this country for 26 years. He is a respected and integral part of his community, so his separation would be a loss not just for his family but also for his friend and neighbors, and more broadly, for our city.

TAB D

3/15/2026

Dear Immigration Judge,

I, Eric Meneses-Munoz, was born on  I am a citizen of the United States. I am currently employed at The Mexican Post Delaware as well as owning EKM Contracting, LLC. I agree to pay the Immigration Bond in the case of Angel Pantoja Sauce, if a bond is set in the case. Angel Pantoja Sauce is my cousin-in-law. Please contact me should you have any additional questions or concerns.

Respectfully Submitted,

Eric Meneses Munoz

