

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
FORT MYERS DIVISION**

JOEL AMETH GIRON CAMARGO,

Petitioner,

v.

Case No. 2:26-cv-767-SPC-NPM

U.S. ATTORNEY GENERAL, et al.,

Respondents.

OPPOSITION TO SECOND MOTION TO ENFORCE

On June 2, 2026, Petitioner signed his first motion to enforce. Dkt. 14 at 11. That motion was docketed on June 5, 2026. *Id.* On June 11, 2026, this Court granted Petitioner's motion in part. Dkt. 17.

Meanwhile, on June 1, 2026, Petitioner had been notified of an individualized bond hearing scheduled to occur on June 9, 2026. Ex. 1 at 1. In the Immigration Court, Petitioner applied for voluntary departure in lieu of removal. *Id.* at 2. He was granted that voluntary departure, and was ordered to depart on or before July 6, 2026, without expense to the Government. *Id.* On June 9, 2026, Petitioner signed the Voluntary Departure and Verification of Departure form. *Id.* at 5. At the bond hearing on June 9, 2026, the Immigration Judge denied beyond because the Petitioner failed to present evidence of materially changed circumstances and because the Petitioner had requested and was granted voluntary departure. *Id.* at 6.

In response to the Court's June 11, 2026, Order, the Federal Respondents scheduled an individualized bond hearing for Petitioner that was set for June 16, 2026. Ex. 1 at 8. Petitioner was notified on June 12, 2026, of that scheduled bond hearing. *Id.* The bond hearing was later rescheduled for June 18, 2026, and Petitioner was notified of the changed date on June 16, 2026. *Id.* at 9.

Undersigned counsel based on communication with ICE, has been informed of the following. Petitioner was scheduled to depart via flight from LAX on 10:13pm on June 18, 2026. He was taken to the airline ticket counter but the escorting officers were unable to obtain his boarding pass. They later learned that whoever had purchased the ticket for Petitioner had cancelled the ticket and received a refund. ICE intended to meet with Petitioner to ask about the status of a new itinerary for Petitioner's voluntary departure. If the Petitioner does not depart by July 6, 2026, he will be removed at the Government's expense via commercial air operations. Undersigned counsel has requested a declaration from ICE attesting to this account but has not yet received it, but will provide it to the Court as soon as possible.

Also on June 18, 2026, the Immigration Judge entered an order stating that the Petitioner had been released on June 18, 2026. *Id.* at 10. This appears to have been in error because of Petitioner's anticipated voluntary departure then failure to depart because of the cancelled ticket.

Plaintiff's second motion to enforce was dated June 19, 2026 (Dkt. 18 at 2), but the mailing envelope appears to have been postmarked June 16, 2026 (Dkt. 18-1).

Petitioner was notified on June 22, 2026, that he was scheduled for an additional individualized bond hearing to occur today, June 24, 2026.

ARGUMENT

The Federal Respondents oppose Petitioner's second motion to enforce. The Federal Respondents scheduled and held the individualized bond hearing as ordered by this Court. Ex. 1 at 8-11. There was every indication that Petitioner had opted for a voluntary departure. *See, id.* at 2-5, 6, 10-11. Once Petitioner failed to voluntarily depart as scheduled, an additional individualized bond hearing was scheduled. *Id.* at 12.

WHEREFORE, the Federal Respondents respectfully request that this Court deny Giron Camargo's Second Motion to Enforce.

DATED this 24th day of June, 2026.

Respectfully submitted,

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