

1 Spencer C. Lee
Smith, Alston, Darner & Lee, PLC
2 2210 N. 7th Street
Phoenix, AZ 85006
spencer@salfirm.com
3 602-595-2040
AZ Bar No. 032991

4 *Attorney for Petitioner*

5 UNITED STATES DISTRICT COURT
6 FOR THE DISTRICT OF ARIZONA

7 Nehemias Suhul-Cruz,

8 Petitioner,

9 v.

10 Eric Rokosky, Warden, Eloy Detention Center;

11 Christopher McGregor, Field Office Director of
12 Phoenix Office of Detention and Removal, U.S.
Immigration and Customs Enforcement; U.S.
13 Department of Homeland Security;

14 Todd M. Lyons, Acting Director, Immigration and
Customs Enforcement, U.S. Department of Homeland
15 Security;

16 Kristi Noem, in her Official Capacity, Secretary, U.S.
Department of Homeland Security; and

17 Pamela Bondi, in her Official Capacity, Attorney
18 General of the United States;

19 Respondents.

Case No.

A- 

**PETITION FOR WRIT OF
HABEAS CORPUS AND
COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF**

Challenge to Unlawful Detention
Under 28 U.S.C. § 2241

20
21 **INTRODUCTION**

22 1. Petitioner Nehemias Suhul-Cruz is a citizen and national of Guatemala who entered
23 the United States as a juvenile in March 2013.
24

1 2. Petitioner was detained by Immigration and Customs Enforcement (“ICE”) on or
2 about July 18, 2018, during a civil immigration enforcement action, not as the result of any
3 criminal arrest or charge. Petitioner was released from ICE custody that same day under an
4 Order of Release on Recognizance.

5 3. Since his release, Petitioner has lived openly and peaceably in the interior of the
6 United States, complied with all conditions imposed by the government, and has never
7 absconded or engaged in criminal conduct.

8 4. On or about February 16, 2026, Petitioner was re-detained without prior notice by
9 ICE while on his way to work.

10 5. Petitioner was not re-detained based on his individual circumstances, but rather
11 pursuant to a blanket enforcement directive treating all noncitizens with pending immigration
12 proceedings as enforcement priorities. Petitioner’s detention was not the product of statutory
13 discretion or reasoned judgment, but instead the result of an unlawful policy of categorical
14 detention—detaining individuals solely because they have pending immigration cases,
15 regardless of risk, compliance, or due process. Petitioner’s detention is arbitrary and unlawful,
16 and he requests that this Court order his immediate release.

17 6. Despite the absence of any criminal conduct, and despite Petitioner’s history of
18 compliance with the terms of his release, ICE re-detained Petitioner without providing any
19 individualized determination that he poses a flight risk or danger sufficient to justify detention
20 under 8 U.S.C. § 1226(a). Instead, ICE summarily deprived Petitioner of his liberty without
21 cause, without process, and without any neutral assessment of necessity.

22 7. Recently, the United States District Court for the Central District of California
23 certified a Rule 23(b)(2) class in *Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, 2025
24

1 WL 3288403 (C.D. Cal. Nov. 25, 2025). The class consists of:

2 “[a]ll noncitizens in the United States without lawful status who (1) have entered or will
3 enter the United States without inspection; (2) were not or will not be apprehended upon
4 arrival; and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), §
5 1225(b)(1), or § 1231 at the time the Department of Homeland Security makes an initial
6 custody determination.” *Id.* at 9.

7 8. Under this class definition, there are two groups of people who have claims to relief.
8 First, there are those who entered the United States, were not apprehended at or near the border
9 or close in time to their entry, and who were later arrested by immigration authorities. Second,
10 there are those who were apprehended at or near the border and close in time to their entry,
11 were released on recognizance, and then were re-detained by immigration authorities after
12 residing in the United States. Petitioner falls squarely within the second class.

13 9. Because Petitioner has no final order of removal and may be detained, if at all, only
14 under the discretionary framework of INA § 1226(a), ICE’s decision to no notice re-detain
15 him pursuant to a categorical mandate—without individualized findings, notice, or a
16 meaningful opportunity to be heard—violates the Due Process Clause of the Fifth
17 Amendment. The Constitution does not permit categorical detention based on status alone,
18 nor to substitute blanket enforcement directives for the individualized process the law
19 requires.

20 10. Petitioner therefore respectfully requests that this Court grant the writ and order his
21 immediate release from custody. In the alternative, should the Court determine that immediate
22 release is not warranted, Petitioner requests that the Court require Respondents to provide a
23 prompt bond hearing within a specified period, at which the government bears the burden of
24

1 justifying continued detention under INA § 236(a).

2 3 JURISDICTION & VENUE

4 11. This Court has jurisdiction under 28 U.S.C. §§ 2241 *et seq.*; the Declaratory
5 Judgment Act, 28 U.S.C. §§ 2201 *et seq.*; the All Writs Act, 28 U.S.C. § 1651; and the Fifth
6 Amendment to the United States Constitution.

7 12. Federal district courts have jurisdiction to hear habeas claims by non-citizens
8 challenging the lawfulness of their detention. *See, e.g., Zadvydas*, 533 U.S. at 687.

9 13. Federal courts also have federal question jurisdiction, through the APA, to “hold
10 unlawful and set aside agency action” that is “arbitrary, capricious, an abuse of discretion, or
11 otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A). APA claims are cognizable on
12 habeas. 5 U.S.C. § 703 (providing that judicial review of agency action under the APA may
13 proceed by “any applicable form of legal action, including actions for declaratory judgments or
14 writs of prohibitory or mandatory injunction or habeas corpus”). The APA affords a right of
15 review to a person who is “adversely affected or aggrieved by agency action.” 5 U.S.C. § 702.

16 14. Although the Supreme Court in *Jennings v. Rodriguez*, 583 U.S. ____ (2018) rejected
17 the statutory imposition of periodic bond hearings under the immigration detention statutes, it
18 expressly preserved individual, as-applied constitutional challenges to prolonged immigration
19 detention. Accordingly, this Court has jurisdiction under 28 U.S.C. § 2241 to adjudicate
20 Petitioner’s Fifth Amendment due process challenge to the lawfulness of his continued
21 detention.

22 15. Venue is proper in this district and division pursuant to 28 U.S.C. § 2241(c)(3) and 28
23 U.S.C. § 1391(b)(2) and (e)(1) because Petitioner is detained within this district at the Eloy
24

1 Detention Center. Furthermore, a substantial part of the events or omissions giving rise to this
2 action occurred and continue to occur at ICE's Phoenix Field Office in Phoenix, Arizona, within
3 this division.

4
5 **PARTIES**

6 16. Petitioner Nehemias Suhul-Cruz is a native and citizen of Guatemala. He is currently
7 detained at the Eloy Detention Center.

8 17. Respondent Eric Rokowsky is, upon information and belief, the Warden of the Eloy
9 Detention Center, where Petitioner is being detained. He is Petitioner's immediate legal
10 custodian and thus a proper respondent in this matter. *See Rumsfeld v. Padilla*, 542 U.S. 426,
11 435 (2004).

12 18. Respondent Christopher McGregor is the Field Office Director of the ICE
13 Enforcement and Removal Operations (ERO) Phoenix Field Office and is the federal agent
14 charged with overseeing all ICE detention centers in Arizona, including the Eloy Detention
15 Center. Mr. McGregor is responsible for Petitioner's detention, and thus a legal custodian of
16 Petitioner.

17 19. Respondent Todd M. Lyons is the Acting Director of U.S. Immigration and Customs
18 Enforcement (ICE) and is the federal agent charged with overseeing all ICE operations. He is
19 sued in his official capacity.

20 20. Respondents Pamela Jo Bondi and Kristi Noem are, respectively, the Attorney
21 General of the United States and the Secretary of Homeland Security. As such, they are
22 responsible for maintaining the immigration detention system. They are thus the ultimate legal
23 custodians of Petitioner.

STATEMENT OF FACTS

21. Petitioner is a native and citizen of Guatemala.

22. Petitioner entered the United States at the southern border in or about March 2013 as a juvenile.

23. On or about July 18, 2018, Petitioner was detained by ICE officers and was placed into ICE custody.

24. That same day, Petitioner was released from ICE custody under an Order of Release on Recognizance. *See* Exh. A, Order of Release on Recognizance.

25. In 2018, Petitioner filed a Form I-589 Application for Asylum, Withholding of Removal, and Protection under CAT.

26. In August 2021, Petitioner's U.S. citizen spouse filed a Form I-130 Petition for Alien Relative for Petitioner ("Family Petition"). On August 6, 2021, U.S. Citizenship and Immigration Services ("USCIS") issued a receipt notice confirming its receipt of the Family Petition. *See* Exh. B, Receipt Notice. The Family Petition remains pending at USCIS. *See* Exh. C, Case Status Screenshot.

27. In 2023, Petitioner's removal proceedings at the Executive Office for Immigration Review ("EOIR") were administratively closed with the Department of Homeland Security's ("DHS") agreement on account of the pending Family Petition.

28. On or about February 16, 2026, ICE re-detained Petitioner without prior notice despite his pending Family Petition and no changes in his criminal history or immigration status.

29. The arresting ICE officers did not articulate a reason as to why Petitioner was being re-detained, such as why he is now considered a flight risk, a danger to his community, or for

1 any purported violations of the conditions associated with his release from ICE custody in 2018.

2 30. Indeed, there have been no changes in Petitioner's circumstances. For the past eight
3 years that Petitioner has lived in freedom, he has been an exemplary asset to his community.
4 Petitioner has two young U.S. citizen children.

5 31. Pursuant to *Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), Respondents take the
6 position that Petitioner is subject to mandatory detention and that an immigration judge lacks
7 jurisdiction to conduct a discretionary bond hearing in his case.

8 32. Respondents may also rely on *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), to argue
9 that upon re-detention, Petitioner was returned to the custody from which he was paroled. That
10 reliance is misplaced and in direct conflict with the reasoning in *Bautista*.

11 33. Unlike the respondent in *Q. Li* (who was detained at a check in after ICE was notified
12 of a Interpol Red Notice), Petitioner was affirmatively released by ICE into the interior of the
13 United States, lived openly for eight years, complied with all conditions of release, and was
14 later re-detained pursuant to a blanket enforcement directive rather than any individualized
15 finding of flight risk or dangerousness. Nothing in *Q. Li* authorizes DHS to re-detain a
16 noncitizen solely because he has a pending immigration case, without process, and without the
17 discretionary analysis required under INA § 236(a).

18 34. On December 18, 2025, the *Bautista* court entered judgment declaring that "Bond
19 Eligible Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory
20 detention under § 1225(b)(2)," and vacating "the Department of Homeland Security policy
21 described in the July 8, 2025, 'Interim Guidance Regarding Detention Authority for Applicants
22 for Admission'" as unlawful under the Administrative Procedure Act. *Bautista v. Santacruz*,
23 No. 5:25-CV-01873-SSS-BFM, 2025 WL 3678485, at *1 (C.D. Cal. Dec. 18, 2025).

1 35. On February 18, 2026, the *Bautista* Court vacated *Yajure Hurtado*.

2 36. Petitioner remains detained by ICE without having received an individualized
3 custody determination, and without any opportunity to demonstrate that he does not pose a
4 danger to the community or a flight risk sufficient to justify detention under INA § 236(a).

5
6 **ARGUMENT AND GROUNDS FOR RELIEF**

7 **I. GROUND ONE: PETITIONER'S RE-DETENTION VIOLATES THE DUE
8 PROCESS CLAUSE OF THE FIFTH AMENDMENT.**

9 **A. Petitioner Possessed a Protected Liberty Interest.**

10 37. Civil immigration detention implicates a fundamental liberty interest protected by
11 the Fifth Amendment. Civil immigration detention is permissible only where it is reasonably
12 related to a legitimate regulatory purpose, such as ensuring appearance at removal proceedings
13 or protecting the community. It may not be punitive or excessive in relation to that purpose.

14 38. Petitioner was affirmatively released by ICE in July 2018 and permitted to reside in
15 the interior of the United States under his own recognizance. For eight years, he complied with
16 all conditions of release, maintained strong community ties, and engaged in no criminal
17 conduct.

18 39. Freedom from physical restraint lies at the core of the liberty protected by the Due
19 Process Clause. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

20 40. When the government exercises discretion to release an individual into the
21 community, that individual acquires a constitutionally protected liberty interest in remaining
22 free from arbitrary confinement.

23 41. ICE revoked that liberty on February 16, 2026, without notice, explanation, or
24 individualized findings.

1 42. The revocation of previously granted liberty triggers procedural due process
2 protections.

3 **B. Under *Mathews v. Eldridge*, the Process Provided was Constitutionally**
4 **Inadequate.**

5 43. Due process requires courts to balance (1) the detainee's interest in private liberty;
6 (2) the risk of erroneous deprivation of individual interests under existing procedures; and (3)
7 the government's interest in limiting procedural burdens. *Mathews v. Eldridge*, 424 U.S. 319
8 (1976).

9 44. Here, each factor weighs in Petitioner's favor.

10 45. First, the private interest is substantial. Petitioner had been living freely in the
11 community for eight years, had complied with all reporting requirements, and had established
12 family and community ties, including his marriage to a U.S. citizen and the birth of his two U.S.
13 citizen children. The deprivation at issue is physical confinement: the most severe civil restraint
14 the government may impose.

15 46. Second, the risk of erroneous deprivation is acute. ICE provided no written notice,
16 no explanation of changed circumstances, no custody redetermination, and no opportunity to
17 respond before re-detention. The absence of any individualized review creates a high risk that
18 detention is arbitrary rather than necessary. The value of additional safeguards—such as a
19 custody determination or bond hearing—is obvious and substantial.

20 47. Third, the government's interest does not justify summary detention. The government
21 has a legitimate interest in preventing flight and protecting the community. But those interests
22 were already assessed when ICE released Petitioner in 2018. No new facts have been identified
23 to justify reversal of that determination. Requiring individualized process imposes minimal
24 administrative burden and aligns with the statutory framework of § 1226(a).

1 48. Under *Mathews*, revoking liberty without notice, explanation, or individualized
2 assessment violates the Fifth Amendment.

3 **C. The Constitution Does Not Permit Categorical Re-Detention Without**
4 **Process.**

5 49. Even if Respondents argue that statutory authority permits detention, the Constitution
6 independently limits how that authority may be exercised.

7 50. The government may not convert discretionary release into categorical detention
8 without process. Civil detention must bear a reasonable relationship to its regulatory purpose.
9 *Zadvydas*, 533 U.S. at 690.

10 51. Where detention is imposed without assessing flight risk or dangerousness, it ceases
11 to be regulatory and becomes arbitrary confinement.

12 52. Petitioner's re-detention was not the result of individualized necessity. It was the
13 product of a blanket enforcement directive. That is insufficient under the Due Process Clause.

14 **II. GROUND TWO: PETITIONER'S DETENTION IS GOVERNED BY INA §**
15 **236(a), NOT INA § 235(b).**

16 53. Petitioner is detained without a final order of removal. Accordingly, DHS's detention
17 authority, if any, must arise under INA § 236(a), 8 U.S.C. § 1226(a), which governs the arrest
18 and detention of noncitizens already present in the United States pending removal proceedings.

19 54. Respondents may contend that Petitioner is subject to mandatory detention under
20 INA § 235(b)(2) on the theory that he is an "applicant for admission." That position is foreclosed
21 by the statutory framework and by recent district court decisions.

22 55. INA § 1226(a) is the default detention statute for noncitizens who have already
23 entered and are present in the United States, while § 1225(b) applies to noncitizens seeking
24 admission at or near the time of entry. *Jennings v. Rodriguez*, 583 U.S. 281, 288–89 (2018);

1 *Nielsen v. Preap*, 586 U.S. 392, 395–97 (2019).

2 56. Although § 1225(a)(1) provides that certain noncitizens “shall be deemed” applicants
3 for admission, this deeming provision does not automatically trigger § 1225(b)(2) detention.
4 Rather, § 1225(b)(2) applies only where an examining immigration officer determines that an
5 applicant for admission who is “seeking admission” is not clearly entitled to enter.

6 57. The phrase “seeking admission” has an active, temporal meaning and cannot be
7 stretched to cover a person who has already been living in the United States for years.

8 58. Petitioner is plainly “already in the country pending the outcome of removal
9 proceedings,” and therefore his detention is governed by INA § 236(a). *Jennings*, 583 U.S. at
10 297.

11 59. Under § 236(a), detention is discretionary, and the statute expressly authorizes release
12 on bond or conditional parole. 8 U.S.C. § 1226(a). Noncitizens detained under this provision
13 are entitled to an individualized bond hearing before an immigration judge.

14 60. Because Petitioner is not subject to expedited removal, has no final order of removal,
15 and was encountered in the interior after entry and discretionary release by ICE, any detention
16 predicated on INA § 235(b)(2) is ultra vires and unlawful.

17 61. For this reason alone, Petitioner’s continued detention without a bond hearing
18 violates the Immigration and Nationality Act and must be remedied.

19 62. Where a noncitizen is unlawfully denied a bond hearing under INA § 236(a), the
20 appropriate remedy under 28 U.S.C. § 2241 is an order requiring DHS to provide a prompt bond
21 redetermination hearing before an immigration judge or release the petitioner from custody.

22 63. Petitioner therefore respectfully requests that this Court grant the writ and order his
23 immediate release from custody. In the alternative, should the Court determine that immediate
24

1 release is not warranted, Petitioner requests that the Court require Respondents to provide a
2 prompt bond hearing within a specified period, at which the government bears the burden of
3 justifying continued detention under INA § 236(a).

4
5 **PRAYER FOR RELIEF**

6 64. Petitioner is being unlawfully detained in violation of the Immigration and
7 Nationality Act and the Due Process Clause of the Fifth Amendment. WHEREFORE, Petitioner
8 respectfully requests that this Court:

- 9 a. Order Respondents to answer the petition on an expedited basis due to
10 Petitioner's detained status;
- 11 b. Grant the Petition for writ of habeas corpus;
- 12 c. Issue an Order prohibiting the Respondents from transferring Petitioner
13 from the district without the Court's approval;
- 14 d. Order Respondents to immediately release Petitioner from ICE custody and
15 restore him to the same status and conditions of release under which he was
16 previously released, pending the approval of his Family Petition;
- 17 e. Alternatively, order Respondents to provide Petitioner with a prompt bond
18 hearing pursuant to INA § 236(a) at which the government bears the burden
19 of justifying continued detention; and;
- 20 f. Grant further relief as the Court deems just and proper.

21
22
23
24 Dated: March 24, 2026

Respectfully submitted,

/s/ Spencer C. Lee

Spencer C. Lee

Attorney for Petitioner

VERIFICATION PURSUANT TO 28 U.S.C. 2242

I am submitting this verification on behalf of the Petitioner because I am one of Petitioner's attorneys. I have discussed with the Petitioner the events described in the Petition. Based on those discussions, I hereby verify that the factual statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Executed on this March 24, 2026, in Phoenix, AZ.

/s/ Spencer C. Lee

Spencer C. Lee

Attorney for Petitioner

CERTIFICATE OF SERVICE

This is to certify that on March 24, 2026, the foregoing PETITION FOR WRIT OF HABEAS
CORPUS AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF was
served by certified mail, on:

Eric Rokowsky,
Warden, Eloy Detention Center,
1705 East Hannah Road
Eloy, AZ 85131-9612

Christopher McGregor,
Field Office Director of Phoenix Office of Detention and Removal, U.S. Immigration and
Customs Enforcement
Office of the General Counsel
U.S. Department of Homeland Security
245 Murray Lane, SW
Mail Stop 0485
Washington, DC 20528-0485

Todd M. Lyons, Acting Director, Immigration and Customs Enforcement
Office of the General Counsel
U.S. Department of Homeland Security
245 Murray Lane, SW
Mail Stop 0485
Washington, DC 20528-0485

Kristi Noem
Secretary, Department of Homeland Security
Office of the General Counsel
U.S. Department of Homeland Security
245 Murray Lane, SW
Mail Stop 0485
Washington, DC 20528-0485

Pamela Bondi
Attorney General of the United States
950 Pennsylvania Avenue, NW,
Washington, DC 20530

1 Timothy Courchaine, U.S. Attorney
2 Federal District Court, District of Arizona
3 U.S. Attorney's Office
4 40 N. Central Avenue, Suite 1800
Phoenix, AZ 85004-4449

5 /s/ Spencer C. Lee
6 Spencer C. Lee
7 Smith, Alston, Darner, and Lee
8 2210 N 7th Street
9 Phoenix, AZ 85006
10 info@salfirm.com
11 602-595-2040
12 AZ Bar No. 032991
13
14
15
16
17
18
19
20
21
22
23
24

EXHIBIT A

U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement

ORDER OF RELEASE ON RECOGNIZANCE

Event Number: File No.: 

Date: July 18, 2018

Name: SUHUL-CRUZ, NEHEMIAS

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

☒ You must report for any hearing or interview as directed by Immigration and Customs Enforcement or the Executive Office for Immigration Review.

☒ You must surrender for removal from the United States if so ordered.

☒ You must report in (writing) (person) to Duty officer at See I-831 on 08/22/2018 09:00 as directed.

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

☒ You must not change your place of residence without first securing written permission from the officer listed above.

☒ You must not violate any local, State or Federal laws or ordinances.

☒ You must assist Immigration and Customs Enforcement in obtaining any necessary travel documents.

☐ Other: Your release is contingent upon your enrollment and successful participation in an Alternatives to Detention (ATD) program as designated by the Department of Homeland Security. Electronic monitoring is a requirement and a curfew may be imposed. Failure to comply with the conditions of your release or the requirements of the ATD program may result in a redetermination of your release conditions or your arrest and detention.

☐ See attached sheet containing other specified conditions (Continue on separate sheet if required)

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

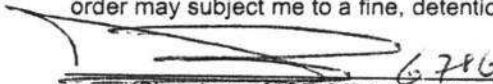
Luis C. Amendariz

LUCERO, ENRIQUE M.

ICE Official

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

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


(Signature of ICE Official serving order)

Nehemias Suhul
(Signature of Alien)

07/18/2018

Date

I hereby cancel this order of release because:

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

(Signature of ICE Official canceling order)

Date

ORDER OF RELEASE ON RECOGNIZANCE

Alien Name SUHUL-CRUZ, NEHEMIAS	Picture 	Right Index Print 
File Number 		
Date July 18, 2018		
Alien's Signature <i>NeheMIAS</i>		
Alien's Telephone Number (if any) 		

PERSONAL REPORT RECORD

[illegible]

DEPARTMENT OF HOMELAND SECURITY
Immigration and Customs Enforcement
**ORDER OF RELEASE ON RECOGNIZANCE
ADDENDUM**

File No.:



Date:

July 18, 2018

Name: SUHUL-CRUZ, NEHEMIAS

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

x Nehemias Suhul
Alien's Signature

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement**ORDER OF RELEASE ON RECOGNIZANCE
OUT-PROCESSING CHECKLIST****Sex Offenders**

- ☐ Probation/Parole Officer Notified
☐ Registered as sex-offender as required by state statute within 7 days
☐ Victim/Witness Coordinator Notified
☐ Victim/Witness Notified
☐ Written Proof of Counseling

Substance Abusers

- ☐ Probation/Parole Officer Notified
☐ Written Proof of Counseling

All Aliens

- ☐ Probation/Parole Officer Notified
☐ Obtain address where living and telephone number
☐ Enter into IDENT FINS#: 
☐ NCIC Check
☐ Travel Document Application
☐ Other: _____

Completed By	
Deportation Officer: CELESTINO, D 6786	Date 07/18/2018

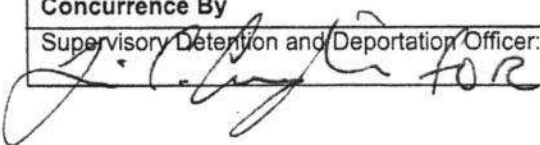
Concurrence By	
Supervisory Detention and Deportation Officer:  LUCERO, ENRIQUE M.	Date 07/18/2018

EXHIBIT C



U.S. Citizenship
and Immigration
Services

MENU

Case Status Online

Case Is Still Being Processed By USCIS

As of February 4, 2022, your Form I-130, Petition for Alien Relative, Receipt Number [REDACTED] is still being processed. We do not currently need anything from you but will contact you if we need additional information regarding your case. If you move, go to www.uscis.gov/addresschange to give us your new mailing address.

Enter Another Receipt Number ?

Check Status

Already have an Account? [Login](#)

Create an Account? [Sign up](#)

DHS PRIVACY NOTICE

PAPERWORK REDUCTION ACT

Related Tools

Change of Address

We strongly encourage you to update your address with USCIS to ensure you receive all correspondence and benefits from us in a timely manner and avoid possible delays or denials related to your case.