

CAMPOS IZQUIERDO LAZARO
ALIEN NO: [REDACTED]
FLORENCE CORRECTIONAL COMPLEX
P.O BOX 6300
FLORENCE, AZ 85132

PRO SE

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CLERK U.S. DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY

UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

CAMPOS IZQUIERDO LAZARO

Petitioner,

Vs.

Luis Rosa Jr, Warden, Central Arizona Florence
Correctional Complex;
Pamela Bondi, Attorney General, U.S. Department of
Justice; and The U.S. Attorney for the District of
Arizona, et.al,

Respondents.

CV26-02363-PHX-JJT--DMF

Case No.

ALIEN NO: [REDACTED]

PETITION FOR WRIT OF
HABEAS CORPUS PURSUANT
TO 28 U.S.C. § 2241

DETAINED

BACKGROUND

Petitioner **CAMPOS IZQUIERDO LAZARO** ("Mr Lazaro" or "Petitioner") is a native and Citizen of Cuba.

On or about 1994, Petitioner came as a refugee and entered the United States.

Petitioner around 03/06/2006, he was ordered removed by an immigration judge, spending several months in custody of ICE while they attempted to remove him.

When Responds failed to get him a travel document, he was released on supervision later.

ICE re-detained petitioner and they stated that his name had come up in their system but did not state the reason for his detention and did not provide him with any paperwork.

Petitioner was later transferred to Florence Correctional Complex Arizona.

Petitioner has currently been detained for over 76 days as of today and over 20 years since he was ordered removed.

On 03/13/2026, ICE removed Mr. Lazaro to Mexico without any notice despite his multiple attempts asking them where they were planning on removing him to so that he may apply for a fear-based protection from that country of removal.

Mexico refused to admit Mr.Lazaro to Mexico and ordered him returned to the United States. On 03/13/2026 he was returned to immigration custody in Florence Correctional Complex Arizona and he informed his deportation officer R.Jones that he wanted to re-open his immigration case and be able to apply for a fear-based protection from Mexico. He was told to wait.

LEGAL FRAMEWORK

A writ of habeas corpus is "available to every individual detained within the United States." Hamdi v. Rumsfeld, 542 U.S. 507, 525 (2004) (citing U.S. Const., Art I, § 9, Cl. 2). The essence of the Habeas corpus is an attack by an a person in custody upon the lagality of that custody, and ...the traditional function of the writ is to secure release from illegal custody. Praiser v. Rodriguez, 411 U.S. 475, 484 (1973). A court may grant a writ of Habeas corpus to a petitioner who demonstrates to be in custody in violation fo the constitution or federal law. 28 U.S.C § 2241(C)(3). Traditionally "the writ of habeas corpus has served as a means of reviewing the legality of Executive detention, and it is in that context that is protections have been strongest. I.N.S V. St. Cyr, 533, U.S. 289, 301 (2001). Accordingly, challenges to immigration-related detention are within the purview of a district court's habeas jurisdiction. Zadvydas v. Davis, 533 U.S. 678, 687 (2001); See also Demore v. Him, 538 U.S. 510, 517 (2003)

CUSTODY STATEMENT

Petitioner is currently detained at the Florence Correctional Center in Florence, Arizona, in the custody of ICE. He has been detained since 01/09/2026. This court has jurisdiction under 28 U.S.C. § 2241.

DISCUSSION.

A. JURISDICTION

This action arises under the constitution of the United States and the Immigration and Nationality Act, 8 U.S.C § 1101 et Seq.

1. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 and 28 U.S.C. § 1331. Venue is proper in the District of Arizona because Petitioner is detained in Florence, Arizona, within this District. This petition challenges only the legality of continued detention, not the underlying removal order. See Zadvydas, 533 U.S. At 688.

2. Because Petitioner challenges his custody, jurisdiction is proper in this court. While the courts of appeals have jurisdiction to review removal orders through petitions for review, *see* 8 U.S.C §§ 1252(a) (1) and (b), the federal district courts have jurisdiction under 28 U.S.C. § 2241 to hear petitions by non citizens challenging the lawfulness of their detention. *See, e.g., Zadvydas v. Davis*, 533 U.S. 678, 687-88 (2001); Nadarajah v. Gonzales, 443 F.3d 1069, 1075-76 (9TH Cir. 2006).

Courts have long had jurisdiction to issue writs of habeas corpus to Petitioners held in custody "in violation of the Constitution or laws or treaties of the United States, 28 U.S.C § 2241(C)(3). Courts carry

1 out the historic purpose of the writ, "namely "to relieve detention by executive authorities without judicial
2 trial "Zadvydas, 533 U.S at 699.

3 Petitioner does not contest the government's decision to execute his removal order, but rather Petitioner
4 contests his detention resulting from violations of the government's mandatory duties [*5] under certain
5 statutes, regulations and the constitution the court has jurisdiction to determine the lawfulness of the
6 Petitioner's detention See Arce v. United States, 899 F.3d 796, 800 (9th CIR,2018)

7 **B. VENUE**

8 3. Venue is proper in the District of Arizona pursuant to 28 U.S.C § 1391(b) and (e)
9 because a substantial part of the events or omissions giving rise to these claims occurred in this district.
10 All material decisions have been made at the Phoenix Field Office of Immigration and Customs
11 Enforcement (ICE), which is located in this judicial district.

12 4. Venue is proper in this District under 28 U.S.C. 1391 and 28 U.S.C, 2242 because
13 at least one Respondent is in this District, Petitioner has been taken into custody and is being detained in
14 this District, Petitioner's immediate physical custodian is located in this District, and a substantial part of
15 the events giving rise to the claims in this action took place in this District. See generally Rumsfeld v.
16 Padilla, 542 U.S. 426, 434 (2004) ("the proper respondent to a habeas petition is 'the person who has
custody over the petitioner'") (citing 28 U.S.C. 2242).

17 7. Importantly, if venue is proper at the time of filing, the District Court will retain
18 jurisdiction even if ICE transfers a petitioner to another district. See Ex Parte Endo, 323 U.S. 283, 304-05
19 (1944) (rejecting mootness after transfer because "there is no suggestion that there is no one within the
20 jurisdiction of the District Court who is responsible for the detention of appellant and who would be an
21 appropriate respondent."); Anariba v. Dir. Hudson City Corr. Ctr., 17 F.4th 434, 446 (3d Cir. 2021)
22 (*[T]he District Court retained jurisdiction following Argueta's transfer out of New Jersey because it
23 already had acquired jurisdiction over Argueta's properly filed habeas petition that named his then-
immediate custodian.").

24 8. This action arises under the Constitution of the United States and the INA, 8
25 U.S.C§ 1101 ef seq.

26 9. Petitioner has exhausted any and all administrative remedies to the extent required
27 by law.
28

REQUIREMENTS OF 28 U.S.C § 2243

10. The Court must grant the petition for writ of habeas corpus or issue an order to show cause ("OSC") to Respondents "forthwith," unless Petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require Respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." Id. (emphasis added).

11. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

PARTIES

12. Petitioner is a non citizen who is currently detained by Immigration and Customs Enforcement (ICE) at the Florence Correctional Complex. He is in the custody, and under the direct control, of Respondents and their agents.

13. Respondent Luis Rosa Jr is the Warden of the Central Arizona of the Florence Correctional Complex, where on information and belief, Petitioner is currently detained. He is a legal custodian of Petitioner and is named in his official capacity.

14. Respondent Christopher McGregor, Director of ICE Enforcement and Removal Operations, is responsible for Phoenix Field Office of ICE with administrative jurisdiction over Petitioner's immigration case. He is a legal custodian of Petitioner and is named in his official capacity.

15. Respondent R.Jones, Deportation officer of the United States Immigration and Customs Enforcement assigned to Petitioner. He is a legal custodian of Petitioner and is named in his official capacity.

16. Respondent Todd M. Lyons is the Acting Director of ICE. He is a legal custodian of Petitioner and is named in his official capacity.

17. Respondent MarkWayne Mullin is the Secretary of the United States Department of Homeland Security (DHS). ~~He~~ She is a legal custodian of Petitioner and is named in her official capacity.

18. Respondent Pamela Bondi is the Attorney General of the United States Department of Justice. She is a legal custodian of Petitioner and is named in her official capacity.

ARGUMENT

(i). Prolonged detention without changed circumstances

Petitioner argues that his continued detention violates the Fifth Amendment's Due process clause under the standard set forth by Zadvydas because he has been detained for over six months and respondents have not shown a likelihood of effectuating his removal.

Petitioner was ordered removed from the United States on 03/06/2006 which is about 20 years ago plus the over 75 days he has been in detention since 01/09/2026 to this day aggregates to a period of over 2 months and therefore his removal is not significantly likely to occur in the reasonably foreseeable future.

Respondents have attempted to remove him from United States but have been unable to effectuate his removal to Mexico but Mexico rejected to admit him and ordered him returned to the United States.

The courts have held that it is presumptively reasonable for the government to detain an alien for a period of 6months while it works to effectuate his removal after issuing a final order of removal against him. Beyond that period, "if removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by statute" and grant the petition for writ of habeas corpus.

Johnson v. Artega-Martinez, 596 U.S. 573,575,142 S.ct. 1987, 213 L.Ed.2d 125 (2022)

Under this statute, a non-citizen ordered removed must be detained for 90 days pending the government's efforts to secure the non-citizen's removal. The statute is however limited to "a period reasonably necessary to bring about [the non-citizen's] removal from the United States and does not permit indefinite detention.

(ii)Notice of Revocation of Release.

Petitioner argues that his detention violates his Fifth Amendment right to due process because Respondents failed to comply with the regulations governing "[c]ontinued detention of Inadmissible...and other aliens beyond the removal period" set forth in 8C.F.R §241.14.

Specifically, Petitioner asserts that, in detaining him on 01/09/2026 and thereafter, ICE failed to provide him with any "prior notice or opportunity to respond". Prior to his arrest by ICE, petitioner did not receive any proper notice and the reasons for his revocation of OSUP instead, his revocation of Release was given to him on 02/26/2026 and it informed him that he had an interview on 03/05/2026. The interview on 03/05/2026 did not actually take place and Mr.lazaro sent an ICE request to ICE on 03/07/2026 asking about the informal interview he was supposed to have and he got a response that they would inform his

1 Deportation officer *See Exhibit F*. That means he was not given an opportunity to respond to the reasons
2 for his revocation of Release and given a chance to submit evidence the support for his review for release
3 but he was merely told that his travel document for removal had been attained and still did not state
4 where he was being removed to.

5 Petitioner argues that these regulations are designed to protect non-citizens' "liberty and property
6 interests", so the failure to follow them " constitutes a per se violation of Due process. (citing Accardi,
7 347 U.S. at 266-68).

8 The Supreme court has recognized that a federal agency's failure to comply with its own regulations
9 generally renders the associated agency actions unlawful. See Accardi, 347 U.S. at 268. In Accardi, the
10 court considered a habeas petition filed on behalf of an individual whose application for suspension of
11 deportation had been denied by the Board of Immigration (BIA), which itself had affirmed a decision by
12 the Commissioner of Immigration. See id. at 261, 263-64. The petition asserted that in denying the
13 application the Board of Immigration Appeals had failed to follow its own regulations requiring it to
14 "exercise its own judgment when considering appeals" because the Attorney General had included the
15 petitioner on a list of "unsavory characters" that he planned to have deported, discussed the list at a press
16 conference and had the list circulated to the BIA and other relevant agencies before the BIA ruling, such
17 that the matter had been effectively pre-judged. The Supreme court objected to BIA's "alleged failure to
18 exercise its own discretion, contrary to existing valid regulations" and remanded the case so that the
19 petitioner could " receive a new hearing before the Board without the burden of previous proscription by
20 the list.

21 To make matters worse, the revocation of Release states petitioner's name, Alien number the date for the
22 formal interview but then its not signed by any Authorized official, no name of authorized official and the
23 title of the authorized official all remain blank. The proof of service is equally not signed by any relevant
24 agency official which renders the document irrelevant to the Notice of Release.

25 (iii). Informal Interview

26 Petitioner also avers that he was not provided with an informal interview at which he could contest his
27 illegal detention. Pursuant to 8 C.F.R. 241.13, petitioner will be afforded an informal interview at which
28 he will be given an opportunity to respond to the reasons for the revocation and he may submit any
evidence or information he wishes to be reviewed in support of his release. As such, petitioner was not
provided notice and not given an opportunity to be heard regarding his OSUP revocation promptly when

1 returned to custody.

2 A prompt initial interview was not provided to petitioner upon his return into custody but was rather only
3 given a notice almost 2 months after his return into custody and still only told petitioner that they had got
4 a travel document for his removal.

5 It is well established that government agencies are requested to follow their own regulations.
6 "Delkash, 2025 U.S. Dist. LEXIS 194376, 2025 WL 2683988, (Citing United states ex rel Accardi V.
7 Shaughnessy, 347 US Dist 260,268,74 S. Ct 499,98 L.Ed.681 (1954).

8 To the extent that respondents failed to follow release revocation procedures, Petitioner's re-detention
9 should be rendered unlawful See Nazarian, 2025 WL 3236209, Esmail, 2025 US Dist. LEXIS 215203
10 2025 WL 3030590.

11 For this reason, there remains a serious question as to whether petitioner was provided sufficient due
12 process under 8 C.F.R. 241.13(i)(3)

13 "Section 241(a) of the Immigration and Nationality act (INA), codified at 8 U.S.C §1231(a), authorizes
14 the detention of non citizens who have been ordered removed from the United States. "Johnson v. Artega-
15 Martinez, 596 U.S. 573, 575, 142 S. Ct. 1987, 213 L.Ed. 2D 125 (2022). Under this statute, a non citizen
16 ordered removed must be detained for 90 days pending the government's efforts to secure the non
17 citizen's removal. The statute is however limited to "a period reasonably necessary to bring about [the non
18 citizen's] removal from the United states and does not permit indefinite detention.

19 Petitioner contends that his detention that "his detention is not authorized by statute or due process"
20 because the 6 months presumptively reasonable period for detaining him expired in 2020 when he was
21 ordered removed by an immigration judge. Here there is no significant likelihood that petitioner will be
22 removed in the reasonably foreseeable future after being placed in detention for an extended period of
23 over 100 days since 11/16/2025 when Respondents returned him to custody in Arizona.
24
25
26
27
28

(IV). ICE's failure to allow petitioner seek relief from 3rd country removal.

26. The Government itself has repeatedly acknowledged this right to notice and an opportunity to seek relief, including recently before the U.S. Supreme Court. Transcript of Oral Argument at 33, *Riley v. Bondi*, 23-1270 (2025) ("We would have to give the person notice of the third country and give them the opportunity to raise a reasonable fear of torture or persecution in that third country,"); *see also* Transcript of Oral Argument at 20-21, *Johnson v. Guzman Chavez*, 594 U.S. 523 (2021). Specifically, if ICE were to attempt to remove a non citizen to country not designated on their removal order and the non citizen's removal proceedings would have to be reopened for the IJ to designate the alternative country of removal and for the non citizen to apply for any fear-based relief in withholding-only proceedings. *See Aden v. Nielsen*, 409 F. Supp. 3d 998, 1006-10 (W.D. Wash. 2019); accord 8 U.S.C. § 1231 (b)(3)(A); 8 C.F.R. § 1240.10(f); 8 C.F.R. § 1240.11(c)(1).

ICE refused to disclose to Mr. Lazaro that Mexico was to be the country for his removal so that he could apply for a fear-based protection relief. This in itself is a violation of Due process. Release is the most common and appropriate remedy for a *Zadvydas* violation. (ordering release under appropriate conditions ICE could not show progress in removal Cuba. To order Mr.Lazaro's immediate release, this Court need only determine that his removal is not reasonably foreseeable under *Zadvydas*.

(V). ICE's Failure to Comply with Its Own regulations Violates the Due Process Clause and the APA Pursuant to *Accardi*.

27. The Government itself has repeatedly acknowledged this right to notice and an opportunity to seek relief, including recently before the U.S. Supreme Court. Transcript of Oral Argument at 33, *Riley v. Bondi*, 23-1270 (2025) ("We would have to give the person notice of the third country and give them the opportunity to raise a reasonable fear of torture or persecution in that third country,"); *see also* Transcript of Oral Argument at 20-21, *Johnson v. Guzman Chavez*, 594 U.S. 523 (2021). Specifically, if ICE were to attempt to remove a non citizen to country not designated on their removal order and the non citizen's removal proceedings would have to be reopened for the IJ to designate the alternative country of removal and for the non citizen to apply for any fear-based relief in withholding-only proceedings. *See Aden v. Nielsen*, 409 F. Supp. 3d 998, 1006-10 (W.D. Wash. 2019); accord 8 U.S.C. § 1231 (b)(3)(A); 8 C.F.R. § 1240.10(f); 8 C.F.R. § 1240.11(c)(1).

1 Agencies are bound to follow their own policies that affect the fundamental rights of individuals,
2 including self-imposed policies and processes that limit otherwise discretionary decisions. *See Accardi*,
3 347 U.S. at 267 (holding that BIA must follow its own regulations in its exercise of discretion); *Morton v.*
4 *Ruiz*, 415 U.S. 199, 235 (1974) ("Where the rights of individuals are affected, it is incumbent upon
5 agencies to follow their own procedureseven where the internal procedures are possibly more rigorous
6 than otherwise would be required.").

7 28. When agencies fail to adhere to their own policies as required by *Accardi*, courts frame the
8 violation as a due process violation or as arbitrary, capricious, and contrary to law under the APA. *See*
9 *Sameena, Inc. v. United States Air Force*, 147 F. 3d 1148, 1153 (9TH Cir. 1998) ("An agency's failure to
10 follow its own regulations tends to cause unjust discrimination and deny adequate notice and
11 consequently may result in a violation of an individual's constitutional right to due process.")

12 29. To remedy an *Accardi* violation, a court may direct the agency to properly apply its policy, or a
13 court may apply the policy itself and order relief consistent with the policy. *Damus v. Nielsen*, 313 F.
14 Supp. 3d 317, 343 (D.D.C. 2018) ("[T]his Court is simply ordering that Defendants do what they already
15 admit is required."); *Jimenez v. Cronen*, 317 F. Supp. 3d 626, 657 (D. Mass. 2018) (scheduling bail
16 hearing to review petitioners' custody under ICE's standards because "it would be particularly unfair to
17 require that petitioners remain detained ... while ICE attempts to remedy its failure.").

18 Accordingly, this Court should order Mr. Lazaro 's release on the same conditions with which he was
19 previously complying.

20 (VI). **The third (Mexico) rejected to receive Mr. Lazaro.**

21 Mexico rejected to accept Mr. Lazaro in their country and he was ordered to be returned back to The
22 United States. Mexico officials claimed that they would not accept someone whose medical condition
23 was dire. Mr. Lazaro has **AMYOTROPHIC LATERAL ESCLEROSIS (ALS)** and has suffered a mini-
24 stroke and as a result, Mr. Lazaro has lost his mobility and he is now confined in a wheel chair and he is
25 afraid that his health could even get worse because he is not receiving the treatment he is supposed to.

26 Mr. Lazaro suffered greatly since his return to ICE custody where he has seen his health declining
27 because he has not been given adequate medical attention like he was receiving it before his
28 incarceration.

CLAIMS FOR RELIEF

COUNT I – (PROLONGED DETENTION) VIOLATIONS of 8 U.S.C. § 1231 (a)(6)

30. Mr. Lazaro re-alleges and incorporates by reference the paragraphs above as though fully set forth herein.

31. 8 U.S.C. § 1231 (a)(6), as interpreted by the Supreme Court in *Zadvydas*, authorizes detention only from " a period of reasonably necessary to bring about the aliens removal from the United States. " 533 U.S. 689, 701.

32. The 90-day removal period and the six month presumptive reasonable period from *Zadvydas* have long since expired ,and Mr. Lazaro removal is still not reasonably foreseeable. Therefore, his continued detention violates 8 U.S.C. § 1231 (a)(6) and requires his immediate release.

**COUNT II – VIOLATION OF THE DUE PROCESS CLAUSE OF THE
FIFTH AMENDMENT**

33. Mr.Lazaro re alleges and incorporates by reference the paragraphs above as though fully set forth herein.

34. The Due Process Clause of the Fifth Amendment forbids the Government from depriving any person of liberty without due process of law. U.S. Const. Amend. V. Respondents were required to provide Mr.Lazaro with notice and a meaningful opportunity to re-open his immigration case and allow him an opportunity to raise a reasonable fear-based claim of torture or persecution before being removed to any third country.

COUNT III – UNLIKELIHOOD OF REMOVAL TO CUBA

35. Mr. Lazaro re alleges and incorporates by reference the paragraphs above as though fully set forth herein.

36. Courts must "hold unlawful and set aside agency action" that is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. § 706 (2)(A).

COUNT IV - ICE's failure to allow petitioner seek relief from 3rd country removal (Mexico).

COUNT V - ICE's Failure to Comply with Its Own regulations Violates the Due Process Clause and the APA Pursuant to *Accardi*.

INCORPORATION OF EXHIBITS

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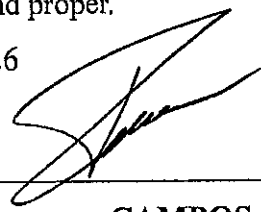
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PRAYER FOR RELIEF

Petitioner respectfully requests that this court:

1. Assume jurisdiction over this matter;
2. Order Respondents to show cause why the writ should not be granted within three days, and set a hearing on this Petition within three days of the return, as required by 28 U.S.C. § 2243;
3. Grant the writ of habeas corpus and order Petitioner's immediate release under the previous Order Of supervision;
4. Declare that Petitioner's detention violates 8 U.S.C. § 1231 and the Fifth Amendment's Due Process Clause;
5. Enjoin Respondents from further detention absent a significant likelihood of removal in the reasonably foreseeable future;
6. Grant such other relief as the Court deems just and proper.

Respectfully submitted this 03 day of 30, 2026

Signed by: 

CAMPOS IZQUIERDO LAZARO

Petitioner, Pro Se.

CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that on 03/30, 2026, Petitioner filed with the United States District Court for the District of Arizona, this Petition for Habeas Corpus. I, **CAMPOS IZQUIERDO LAZARO Pro Se**, do hereby state that I caused a copy of Petition for Habeas Corpus to be served upon the listed individuals below at the indicated addresses via certified U.S. mail (in the event the Court does not issue the summons).

TO: Luis Rosa Jr, Warden
Central Arizona Florence Correctional
Complex
1155 North Pinal Pkwy,
Florence, AZ 85132

Christopher McGregor, Director
ICE Enforcement and Removal Operations,
Phoenix Field Office
2035 N. Central Ave,
Phoenix, AZ 85004

Todd Lyons, Acting Director
U.S. Immigration and Customs
Enforcement
500 12th St. SW
Washington, DC 20536

MarkWayne Mullin, Secretary
U.S. Department of Homeland Security
2707 Martin Luther King Jr. Ave. SE
Washington, DC 20528

Pamela Bondi, Attorney General
U.S. Department of Justice
950 Pennsylvania Ave., NW
Washington, DC 20530-0001

United States Attorney
United States Attorney's Office
District of Arizona
Two Renaissance Square
40 N. Central Ave., Suite 1800
Phoenix, AZ 85004-4449

R. Jones, Deportation Officer
United States Immigration and
Custom Enforcement
3250 N. Pinal Parkway Avenue,
Florence, AZ 85132

ICE Field Office
2035 N. Central Avenue,
Phoenix, AZ 85004

Signed by:


CAMPOS IZQUIERDO LAZARO

Petitioner, Pro Se.

EXHIBIT A

Notice of Revocation Of Release

GA A

ALIEN COPY

Office of Enforcement and Removal Operations

U.S. Department of Homeland Security
Phoenix Field Office
2035 N. Central Avenue
Phoenix, AZ 85004



U.S. Immigration
and Customs
Enforcement

Alien Name: CAMPOS Izquierdo, Lazaro

Alien Number: [REDACTED]

Notice of Revocation of Release

Your release on the order of supervision (OSUP) issued to you on or about April 6, 2004, is hereby revoked. You will remain detained in U.S. Immigration and Customs Enforcement (ICE) custody at this time.

☐ Your release has been revoked pursuant to 8 C.F.R. § 241.4(l), for the following reason(s):

- ☐ The purposes of release have been served.
- ☐ You violated a condition of your release. Specifically, you....
- ☐ It is appropriate to enforce the removal order entered against you as ICE has the ability and means to effectuate your removal.
 - ☐ ICE has obtained a travel document and scheduled your removal to take place no later than.....
 - ☐ ICE is seeking a travel document to effect your expeditious removal to....
 - ☐ On you were ordered removed to but you were granted withholding of removal to Your case is under review for removal to an alternate country.
- ☐ Your conduct, or other circumstance, indicates that release is no longer appropriate. Specifically, you....

OR

☒ Your release has been revoked pursuant to 8 C.F.R. § 241.13(i), for the following reason(s):

- ☐ You violated a condition of your release. Specifically, you
- ☒ Circumstances have changed such that there is a significant likelihood of removal in the reasonably foreseeable future.

Notice to Alien of Revocation of Release

CAMPOS Izquierdo, Lazaro,  Cuba

Page 2 of 3

☒ ICE has obtained a travel document and scheduled your removal to take place no later than **April 2026**.

☐ ICE is seeking a travel document to effect your expeditious removal to **[insert country of removal]**.

☐ On **[insert Date]**, you were ordered removed to **[insert Country]**, but you were granted withholding of removal to **[insert Country]**. Your case is under review for removal to an alternate country.

Notice of Informal Interview

On **March 5, 2026**, you will be afforded an informal interview at which you will be given an opportunity to respond to the reasons for this revocation. You may submit any evidence or information you wish to be reviewed in support of your release.

Penalties for Failure to Comply with Order of Removal

You are advised that you must demonstrate that you are making reasonable efforts to comply with the order of removal and that you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to affect your removal. You are also advised that any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 U.S.C. § 1253(a) and civil penalties under 8 U.S.C. § 1324d.

**CHRISTOPHER D
MCGREGOR**

Digitally signed by
CHRISTOPHER D MCGREGOR
Date: 2026.02.26 09:03:08 -07'00'

**Christopher D. McGregor
Acting Field Office Director**

Date

EXHIBIT B

ICE reply 01/16/2026

Tracking #

FLORENCE SERVICE PROCESSING CENTER

DETAINEE REQUEST FORMDate / Fecha: 01/15 Unit / Unidad:Name / Su Nombre: CRAMPON 1291111111 / LAZARUSFile No. # / Numero de Expediente: Nationality / Paiz: Cuba**** MARK YOUR REQUEST / MARQUE SU SOLICITUD ****

Speak to Deportation Officer / Hablar con mi Oficial de Deportacion



Prints, Pictures / Huellas, Fotos



Additional time in Law Library / Tiempo adicional en la biblioteca de la ley



Special access call / Acceso especial al teléfono

Received



Special visit / la visita especial

JAN 16 2026



Complaint / Queja

DHS/ICE/ERO/FLORENCE



Permission to receive property / Permiso para recibir propiedad



Other Request / Otra solicitud

Have you been to court? ☐ Yes / SiDate of Arrival here? 1/9/2026Usted ya fue a su primer corte? ☐ No

Fecha de entrada aquí?

Explain/Explicar: ANY INFORMATION ON MY CASE?I WOULD LIKE TO KNOW ANYTHING ON MY CASE DUE TO
NO INFORMATION I RECEIVE ON MY PREVIOUS REQUEST
FORM!

INS USE ONLY

Completed? ☒ Yes ☐ No

Officer

Schuy

Date:

1/17/26

Remarks:

We have a final order of removal pending travel documents.

Return completed forms to SDEO daily for inclusion in detainee's detention file.

G:DET_MGT\Detainee Request

RECEIVED

EXHIBIT C

Ice Detainee reply on Medical

Tracking #

Received

FEB 10 2026

FLORENCE SERVICE PROCESSING CENTER

DETAINEE REQUEST FORMDate / Fecha: 7/2026 Unit / Unidad: [REDACTED] Bed / Cama: [REDACTED]Name / Su Nombre: CAMPES IZQUIERDO LAZAROFile No.# / Numero de Expediente: [REDACTED] Nationality / Paiz: MEX**** MARK YOUR REQUEST / MARQUE SU SOLICITUD ****☒

Speak to Deportation Officer / Hablar con mi Oficial de Deportacion

☐

Prints, Pictures / Huellas, Fotos

☐

Additional time in Law Library / Tiempo adicional en la biblioteca de la ley

☐

Special access call / Acceso especial al teléfono

☐

Special visit / la visita especial

☐

Complaint / Queja

☐

Permission to receive property / Permiso para recibir propiedad

☐

Other Request / Otra solicitud

Have you been to court? ☐ Yes / Si

Date of Arrival here?

Usted ya fue a su primer corte? ☐ No

Fecha de entrada aquí?

Explain/Explicar: I REALLY HATE THE DHS DON'T CARE ABOUT MY MEDICAL DISEASE. ON ACCORDANCE TO MY DOCTOR ORDER I NEED BIOPSY TEST IN CASE YOU DON'T KNOW WHAT IT IS THEY TAKING A SMALL PIECE OF MY GALT AND THE REPORT COME BACK WITH A NEUROLOGICAL PROBLEM I GOT ANOTHER PHIL CATIE AND SCLEROSIS (ALS) AND GIBBS DISEASE. THIS COME ON HAD DENIED MY DOCTOR'S INJECTION MEDICATION I REALLY DON'T WANT TO DIE HERE IN THIS PLACE UNFORTUNATELY IS ONLY TWO PERSON KNOW ABOUT MY DISEASE MY DOCTOR AND MY SELF AND YOU. I JUST NOT WANT MY FAMILY WILL KNOW IN MY TIME THEY SUFFERING ALOT BECAUSE I AM HERE! TO DIE HERE

INS USE ONLY

Completed? ☒ Yes ☐ NoOfficer AnyonaDate: 2/10/26

Remarks: IF YOU NEED MEDICAL ATTENTION PUT YOURSELF ON SICK CALL BUT YOU ARE LEAVING VERY SOON

Return completed forms to SDEO daily for inclusion in detainee's detention file.

G:\DET_MGT\Detainee Request

EXHIBIT D

Ice Detainee reply

Tracking #

FLORENCE SERVICE PROCESSING CENTER

DETAINEE REQUEST FORMDate / Fecha: 3/4 Unit / Unidad: [REDACTED] Bed / Cama: _____Name / Su Nombre: CAMPES, ISMAELFile No.# / Numero de Expediente: [REDACTED] Nationality / Paiz: Cuba**** MARK YOUR REQUEST / MARQUE SU SOLICITUD ****

Speak to Deportation Officer / Hablar con mi Oficial de Deportacion



Prints, Pictures / Huellas, Fotos



Additional time in Law Library / Tiempo adicional en la biblioteca de la ley



Special access call / Acceso especial al teléfono



Special visit / la visita especial



Complaint / Queja



Permission to receive property / Permiso para recibir propiedad



Other Request / Otra solicitud _____

Received

MAR 05 2026

PHS/ICE/ERO/FLORENCE

Have you been to court? ☐ Yes / SiDate of Arrival here? 1/09/2026Usted ya fue a su primer corte? ☐ No

Fecha de entrada aquí? _____

Explain/Explicar: (KNOW DHS/ICE DON'T CARE ABOUT MY MEDICAL CONDITION, CAN SOMEONE READ AND UNDERSTAND MY PREVIOUS REQUEST? IT IS NOT TREATMENT FOR MY AMYOTROPHIC LATERAL SCLEROSIS DISEASE IS TERMINAL (ALS) I SPEAK WITH MEDICAL PERSONAL IN HERE AND ONLY I GOT 15 GENERIC MEDICATION THAT MY BODY IS NOT RESPONDING TO EVEN TO THIS GENERIC PILLS, I GETTING WORSE SOONER THAN I WAS EXPECTING LIKE I SAID I KNOW DHS/ICE DON'T CARE ABOUT MY TERMINAL DISEASE BUT I WOULD LIKE NOT TO DIE IN HERE!

INS USE ONLY

Completed? ☒ Yes ☐ NoOfficer LacherDate: 3/6/26

Remarks: If your body is not responding to meds then tell medical and request a change in medications

Return completed forms to SDEO daily for inclusion in detainee's detention file.

G:\DET_MGT\Detainee Request

LACHAR

WAT.

EXHIBIT E

Ice Detainee reply

DETAINEE REQUEST FORM

File No.# / Numero de Expediente: XXXXXXXXXX **Nationality / Paiz:** Cuba

**** MARK YOUR REQUEST / MARQUE SU SOLICITUDE ****

- | | | | |
|---|-------------------------------------|--|---|
|  | ☒ | Speak to Deportation Officer / Hablar con mi Oficial de Deportacion | Received
MAR 05 2026
LAISACERO FLORES |
|  | ☐ | Prints, Pictures / Huellas, Fotos | |
|  | ☐ | Additional time in Law Library / Tiempo adicional en la biblioteca de la ley | |
|  | ☐ | Special access call / Acceso especial al teléfono | |
|  | ☐ | Special visit / la visita especial | |
|  | ☐ | Complaint / Queja | |
|  | ☐ | Permission to receive property / Permiso para recibir propiedad | |
|  | ☐ | Other Request / Otra solicitud | |

Received: 11

MAR 05 2006

LAS/CEERO/FLOTM 1

Have you been to court? ☐ Yes / Si

Date of Arrival here?

Usted ya fue a su primer corte? ☐ No

Fecha de entrada aquí? _____

Explain/Explicar: Look to me that my question in previously request no was answer. ①- I would like to get a copy of the travel document you said you got on my behalf ②- I not Mexican/Mexico ③- I just want a copy of travel documents you got on my behalf.

INS USE ONLY.

Completed? ☒ Yes ☐ No

Officer Laehc

Date: 3/6/20

Remarks: You cannot have a copy. You are final order to Mexico.

Your file has not arrived to Florence yet.

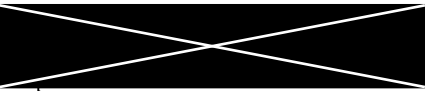
G:DET MGT\Detainee Request

Return completed forms to SDEO daily for inclusion in detainee's detention file.

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EXHIBIT F

Ice Detainee reply

Tracking 

FLORENCE SERVICE PROCESSING CENTER

DETAINEE REQUEST FORMDate / Fecha: 3/5 Unit / Unidad:  Bed / Cama: _____Name / Su Nombre: Campes Izquierdo LazaroFile No. # / Numero de Expediente:  Nationality / Paiz: CUBA**** MARK YOUR REQUEST / MARQUE SU SOLICITUD ****

Speak to Deportation Officer / Hablar con mi Oficial de Deportacion



Prints, Pictures / Huellas, Fotos



Additional time in Law Library / Tiempo adicional en la Biblioteca de la ley



Special access call / Acceso especial al teléfono



Special visit / la visita especial



Complaint / Queja



Permission to receive property / Permiso para recibir propiedad



Other Request / Otra solicitud _____

Have you been to court? ☐ Yes / Si

Date of Arrival here?

Usted ya fue a su primer corte? ☐ No

Fecha de entrada aquí? _____

Explain/Explicar: I REQUESTING A COPY OF MY TRAVEL DOCUMENTS ICE HAS OBTAINED ON MY BEHALF. AND WOULD LIKE TO BE RE-CONSIDERING FOR THE NOTICE OF INFORMAL INTERVIEW ON MY CASE, INTERVIEW WAS TODAY MARCH 5 2026 BUT NO INTERVIEW WAS PROVIDED FOR ME TO PREPARE/submit all my EVIDENCE ON MY CASE PLEASE GIVE ME THAT OPPORTUNITY PLEASE. I GOT STABBED TO THE COMMUNITY PLEASE THANK YOU!

INS USE ONLY

Completed? ☒ Yes ☐ NoOfficer LoehrDate: 3/8/26Remarks: Will notify deportation officer.

Return completed forms to SDEO daily for inclusion in detainee's detention file.

G:\DET_MGT\Detainee Request