

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
ORLANDO DIVISION**

MORALES-SOLIS, RAMIRO

Petitioner,

v.

**Jail Warden, Baker County Detention Center,
GARRETT J. RIPA, Field Office Director for
Immigration and Customs Enforcement and
Removal Operations ("ICE ERO") Miami
(includes Orlando); TODD LYONS,
Acting Director of Immigration Customs
Enforcement ("ICE"); U.S. IMMIGRATION
AND CUSTOMS ENFORCEMENT;
MARK WAYNE MULLIN, Secretary of the
Department Of Homeland Security ("DHS");
and TODD BLANCHE, Attorney General of
the United States,
Respondents.**

Respondents.

Case No. 3:26-cv-1046

**PETITION FOR WRIT OF
HABEAS CORPUS**

INTRODUCTION:

1. On or about February 19, 2026, the Petitioner was stopped by a Polk County Sheriff Deputy and was then arrested for driving with an expired Driver's License for more than 6 months. Florida Statute 322.03(6). Since that time, he had been detained at the Polk County Jail on an ICE Detainer and was then moved to the Baker County Detention Center. He is currently detained in the Baker County Detention Center. Accordingly, to vindicate Petitioner's statutory and constitutional rights, this Court should grant the instant petition for a writ of habeas corpus.

2. Petitioner has been in the United States since November 20, 2016, when he entered

the United States as an unaccompanied minor from Guatemala and was placed in removal proceedings. (See Exhibit A).

3. On April 21, 2026, a bond redetermination hearing was held before the Honorable Judge Pedro J. Espinal. The Judge found that he had no jurisdiction to hear the bond request. (See Exhibit B).

4. Petitioner asks this Court to find that he is being detained unlawfully and order that he be provided a bond redetermination hearing by the Immigration Judge. Respondent's next scheduled Immigration Court hearing is set for a Master Calendar hearing on May 27, 2026 at 2:30pm before the Honorable Immigration Judge Pedro Espinal.

JURISDICTION:

4. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*

5. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause). Under 8 U.S.C. § 1252(e)(2), this Court has habeas authority to determine whether Petitioner is a noncitizen who is subject to unlawful detention by ICE.

6. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All-Writs Act, 28 U.S.C. § 1651.

7. The underlying premise of Petitioner's claim is that he should be classified under 8 U.S.C. § 1226(a) and afforded a bond hearing before an immigration judge rather than being mandatorily detained under 8 U.S.C. § 1225(b)(2).

VENUE:

7. Venue is proper because Petitioner is detained at the Baker County Detention Center and is being held under no bond status, which is within the jurisdiction of this District.

8. Venue is proper in this District because Respondents are officers, employees, or agencies of the United States and Respondent, resides in this District and a substantial part of the events or omissions giving rise to his claims occurred in this District. Petitioners reside in this District, and no real property is involved in this action. 28 U.S.C. § 1391(e).

REQUIREMENTS OF 28 U.S.C. § 2243:

9. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents “forthwith,” unless the 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).

10. 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).

11. Petitioner is “in custody” for the purposes of § 2241 because Petitioner is arrested and detained by Respondents.

PARTIES:

12. Petitioner entered the United States without inspection and is present in Florida. The Petitioner is currently detained at the Baker County Detention Center. Petitioner is a resident

of Orange County Florida. He is in custody, and under the direct control, of Respondents and their agents.

13. Respondent, the assigned warden of the Baker County Detention Center has immediate physical custody of Petitioner pursuant to the facility's contract with U.S. Immigration and Customs Enforcement to detain noncitizens for removal proceedings.

14. Respondent Garrett J. Ripa is sued in his official capacity as the Acting Director of the Orlando Field Office of U.S. Immigration and Customs Enforcement. Respondents are the legal custodian of Petitioner and have the authority to release him.

15. Respondent, Mark Wayne Mullin, is sued in his official capacity as the Secretary of the U.S. Department of Homeland Security (DHS). In this capacity, is responsible for the implementation and enforcement of the Immigration and Nationality Act and oversees U.S. Immigration and Customs Enforcement which is the entity that has lodged the ICE detainer to keep Petitioner in custody unlawfully. Respondent Noem is a legal custodian of Petitioner.

16. Respondent, Todd Blanche, is sued in his official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that capacity, he has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review (EOIR), which administers the immigration courts and the BIA.

17. Respondents are the legal custodian of Petitioners.

STATEMENT OF FACTS (RESTATED):

18. On or about February 19, 2026, the Petitioner was stopped by a Polk County Sheriff Deputy and was then arrested for driving with an expired Driver's License for more than 6 months in violation of Florida Statute 322.03(6). Since that time, he had been detained at the Polk County Jail on an ICE Detainer and then was moved to the Baker County Detention Center to face removal

proceedings. Accordingly, to vindicate Petitioner's statutory and constitutional rights, this Court should grant the instant petition for a writ of habeas corpus.

19. Petitioner has been in the United States since November 20, 2016, when he entered the United States as an unaccompanied minor from Guatemala and was placed in removal proceedings.

20. On April 21, 2026, a bond redetermination hearing was held before the Honorable Judge Pedro J. Espinal. The Judge found that he had no jurisdiction to hear the bond request.

21. Petitioner asks this Court to find that he is being detained unlawfully and order that he be provided a bond redetermination hearing by the Immigration Judge.

CLAIMS FOR RELIEF

COUNT ONE

Violation of Fifth Amendment Right to Due Process

22. The allegations in the above paragraphs are realleged and incorporated herein.

23. The Due Process Clause of the Fifth Amendment to the U.S. Constitution prohibits the federal government from depriving any person of "Life, liberty, or property, without due process of law." U.S. Const. Amend. V. Due Process protects "all persons' within the United States, including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent." Zadvydas v. Davis, 533 U.S. 678, 693 (2001).

24. Due process requires that government action be rational and non-arbitrary. See U.S. v. Trimble, 487 F.3d 752, 757 (9th Cir. 2007). For these reasons, Petitioner's detention violates the Due Process Clause.

25. While the Government has discretion to detain individuals under 8 U.S.C. §1226(a) and to revoke custody decisions under 8 U.S.C. §1226(b), this discretion is not "unlimited"

and must comport with constitutional due process. See Zadvyas, 533 U.S. at 698; Hernandez, 872 F.3d 976, 981 (9th Cir. 2017)(“[T]he government’s discretion to incarcerate non-citizens is always constrained by the requirements of due process.”); Morrissey v. Brewer, 408 U.S. 471, 482 (1972)(holding that due process applies to revocation of parole).

26. Here, Petitioner is detained without any options of paying a bond to be released. Moreover, no circumstances exist to allege that the Respondent is a flight risk or danger to the community. Respondents’ have violated Petitioner’s rights to procedural due process by his prolonged detention.

27. As this Court is fully aware numerous District Court’s throughout the Country have taken different positions on whether or not 8 U.S.C. §1226(a) applies, which affords a bond hearing before an immigration judge or whether or not 8 U.S.C. 1225(b)(2), applies which means mandatory detention for persons who entered the United States without inspection.

28. Recently, in the United States District Court Middle District of Florida, Fort Myers Division in the case of Walther Jimmy Sanchez Alvarez v. Warden Florida Soft Side et al., Case Number 2:26-cv-908-KCD-DF, the Honorable Kyle C. Dudek found that Lopez-Campos v. Raycraft, 797 F. Supp. 3d 771 (E.D. Mich. 2025)(collecting decisions holding that the statutory text of §1226 provides the appropriate framework for evaluating the permissibility of a petitioner’s detention pending otherwise valid removal proceedings). Judge Dudek stated that, “The Court continues to agree that the latter approach better aligns with the statutory text, respects our foundational rules of interpretation, and follows the Supreme Court’s direct guidance.” See Walther Jimmy Sanchez Alvarez v. Warden Florida Soft Side et al. - Case Number 2:26-cv-908-KCD-DF.

29. The Court in Walther Jimmy Sanchez, held that “Petitioner is an alien without lawful status. So, he is entitled to a bond hearing under §1226(a), not immediate release.” See e.g., Lopez-Arevelo v. Ripa, 801 F. Supp. 3d 668 (W.D. Tex. 2025). “Consistent with the ‘comfortable majority position,’ the Court will instead require the Government to provide Petitioner with the statutory process required under §1226(a), which includes a bond hearing.” Id.; Walther at 6.

COUNT TWO

Violation of the Administrative Procedure Act – 5 U.S.C. §706(2)(A), the Immigration and Nationality Act – 8 U.S.C. §1226, and Federal Regulations Not in Accordance with Law and in Excess of Statutory Authority Unlawful Detention

30. Petitioner restates and realleges all paragraphs as if fully set forth here.

31. Under the APA, a court shall “hold unlawful and set aside agency action” that is an abuse of discretion. 5 U.S.C. § 706(2)(A).

32. An action is an abuse of discretion if the agency “entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise.” Nat’l Ass’n of Home Builders v. Defs. Of Wildlife, 551 U.S. 644, 658 (2007)(quoting Motor Vehicle Mfrs. Ass’n of U.S., Inc. v. State Farm Mut. Auto Ins. Co., 463 U.S. 29, 43 (1983)).

33. The INA provided that Respondents may release an individual from custody based on an individualized determination of their danger and flight risk. See 8 U.S.C. §1226(a); Zadvydas, 533 U.S. at 690; Matter of Guerra, 24 I&N Dec. 37 (BIA 2006).

34. To survive an APA challenge, the agency must articulate “a satisfactory explanation” for its action, “including a rational connection between the facts found and the choice made.” Dep’t of Com. v. New York, 139 S. Ct. 2551, 2569 (2019)(citation omitted).

35. By categorically detaining Petitioner and with no consideration of Petitioner’s individualized facts and circumstances, Respondents have violated the INA. Implementing regulations, and the APA. Petitioner is not a danger nor flight risk and no findings to sustain danger of flight risk have been made.

COUNT THREE
Request for temporary restraining order

36. To obtain temporary and preliminary injunctive relief, Petitioner must demonstrate that (1) He is likely to succeed on the merits, (2) He is likely to suffer irreparable harm in the absence of preliminary relief, (3) the balance of equities tips in his favor, and (4) an injunction is in the public interest. Winter v. Nat. Res. Def. Council, Inc., 555 U.S. 7, 20 (2008); see Middle District Local Rule 6.01 – Temporary Restraining Order. When the government is a party, the balance of equities and public interest merge. Nken v. Holder, 556 U.S. 418, 435 (2009); Under the circumstances presented herein, no security bond is required under Federal Rule of Civil Procedure 65(c). The Temporary Restraining Order should be issued to the Baker County Detention Facility located at 1 Sheriffs Office Dr., MacClenny, FL 32063, to be enjoined from removing or deporting the Petitioner until this Habeas Corpus Petition is finalized.

A. Petitioner Is Likely to Succeed on the Merits.

1. Petitioner Is Likely to Prevail on His Claim that he is being held without the option of having a bond hearing and that his prolonged detention by the Federal

Government is in violation of his civil liberties and due process rights.

2. Unfortunately, the United States Government under its authority to enforce Immigration has been violating the Due Process rights of numerous individuals.
3. Numerous pending cases are before this Honorable Court based on this same egregious conduct by the Federal Government and local detention centers.
4. Other persons in a similar position as Petitioner have been able to prevail based on the Government's egregious violation of due process rights. Is more Likely than not that Petitioner's due process rights have also been violated.

B. Petitioner Has Suffered and Will Continue to Suffer Irreparable Harm Absent Emergency Injunctive Relief.

Parties seeking preliminary injunctive relief must also show they are “*likely* to suffer irreparable harm in the absence of preliminary relief.” Winter, 555 U.S. at 20. Irreparable harm is harm for which there is “no adequate legal remedy, such as an award of damages.” Ariz. Dream Act. Coal. v. Brewer (*Ariz. I*), 757 F.3d 1053, 1068 (9th Cir. 2014); see also Daniels Health Scis., L.L.C. v. Vascular Health Scis., L.L.C., 710 F.3d 579, 585 (5th Cir. 2013). Prolonged detention without timely, individualized bond hearings or judicial review violated the Fifth and Fourteenth Amendment due process rights. See Zadvydas v. Davis, 533 U.S. 678 (2001) and Jennings v. Rodriguez, 583 U.S. 281 (2018).

C. The Balance of Hardships and Public Interest Weigh Heavily in Petitioner's Favor.

The final two factors for a injunctive relief—the balance of hardships and public interest—“merge when the Government is the opposing party.” Nken v. Holder, 556 U.S. 418, 435 (2009). Here, Petitioner faces weighty hardships, namely the deprivation of his constitutional rights and an infringement on his due process rights. Respondents by contrast, face no hardship. This would have no impact on the Government. Moreover, numerous cases

have been brought before this Honorable Court based on this same violation being done over and over by the Federal Government and the local detention centers. “[T]he balance of hardships tips decidedly in plaintiffs’ favor” when “[f]aced with such a conflict between financial concerns and preventable human suffering.” Hernandez v. Sessions, 872 F.3d 976, 996 (9th Cir. 2017) (quoting Lopez v. Heckler, 713 F.2d 1432, 1437 (9th Cir. 1983)).

Moreover, Respondent’s “cannot suffer harm from an injunction that merely ends an unlawful practice” Rodriguez v. Robbins, 715 F.3d 1127, 1145 (9th Cir. 2013). The public interest is served by the faithful execution of the immigration laws, and that interest includes respect for protections Congress has enacted and to which the United States has committed itself by treaty. Tesfamichael v. Gonzales, 411 F.3d 169, 178 (5th Cir. 2005) (recognizing “the public interest in having the immigration laws applied correctly and evenhandedly”); Leiva-Perez v. Holder, 640 F.3d 962, 971 (9th Cir. 2011) (noting “the public’s interest in ensuring that we do not deliver [noncitizens] into the hands of their persecutors”); Lujan v. Defs. of Wildlife, 504 U.S. 555, 576 (1992) (discussing “the public interest in Government observance of the Constitution and laws”).

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days;
- (3) Declare that Petitioner’s detention violates the Due Process Clause of the Fifth Amendment and 8 U.S.C. § 2243;

- (4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately or in the alternative order that an Immigration Judge consider bond in this case;
- (5) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
- (6) Grant any further relief this Court deems just and proper.

Respectfully submitted,



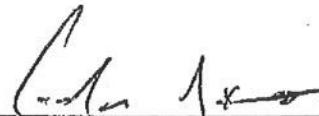
Florida Bar No. 0011567

Counsel for Petitioner

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Ramiro Morales Solis, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 29th day of April, 2026.



Florida Bar No. 0011567

1805 W. Colonial Dr., Ste. D

Orlando, FL 32804

Telephone No.: 407-255-2065

Fax No.: 888-908-3974

Email: civanor@ivanorlaw.com

EXHIBIT A

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

DOB: [REDACTED]

Event: [REDACTED]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

File No: [REDACTED]

In the Matter of:

Respondent: RAMIRO MORALES SOLIS

currently residing at:

(Number, street, city, state and ZIP code)

(Area code and phone number)

- ☐ You are an arriving alien.
- ☒ You are an alien present in the United States who has not been admitted or paroled.
- ☐ You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of GUATEMALA and a citizen of GUATEMALA;
3. You entered the United States at or near unknown, on or about unknown date;
4. You were not then admitted or paroled after inspection by an Immigration Officer. At that time you arrived at a time or place other than as designated by the Attorney General.
5. You are an immigrant not in possession of a valid unexpired immigrant visa, See Continuation Page Made a Part Hereof

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

See Continuation Page Made a Part Hereof

- ☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- ☐ Section 235(b)(1) order was vacated pursuant to: ☐ 8CFR 208.30 ☐ 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

20706 FL-10, SANDERSON, FLORIDA 32087. BAKER CORRECTIONAL INSTITUTION

(Complete Address of Immigration Court, including Room Number, if any)

on April 24, 2026 at 1:00 pm to show why you should not be removed from the United States based on
(Date) (Time)

the charge(s) set forth above.

D 8520 GONZALEZ - (A) SDDO
(Signature and Title of Issuing Officer)

Date: March 31, 2026

Tampa, Florida
(City and State)

* May 27 @ 2:30pm *

Notice to Respondent

Alien Registration: This Notice to Appear serves as evidence of your alien registration pursuant to INA § 262. If you are 18 years or older, failure to carry this Notice to Appear, or other evidence of alien registration as provided in 8 C.F.R. § 264.1(b), on your person at all times is a criminal offense pursuant to INA § 264(e), for which you may be subject to a criminal penalty of \$5,000 and imprisonment of up to 30 days.

Notification to the Department of Homeland Security (DHS) of Change of Address: All aliens aged 14 years or older, and all parents and legal guardians of aliens under the age of 14, must report a change of address to U.S. Citizenship and Immigration Services, a component of DHS, within 10 days of moving, pursuant to INA § 265(a). Failure to notify DHS of your change of address is a criminal offense pursuant to INA § 266(b), for which you may be subject to a criminal penalty of \$5,000 and imprisonment of up to 30 days. More information is available online at <https://www.uscis.gov/addresschange>. This obligation is in addition to your obligation to notify the Immigration Court of your change of address.

Representation: If you choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to INA §§ 240(b)(4)(A) and 292. Unless you request otherwise in writing, no hearing will be scheduled earlier than 10 days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost is provided with this notice.

Conduct of the hearing: At your hearing you will be given the opportunity to admit or deny any or all of the allegations in this Notice to Appear, including that you are inadmissible or deportable. You will be advised by the Immigration judge of any relief from removal for which you may appear eligible, including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the Immigration judge. At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross-examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the Immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/I-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to INA § 208(a)(2)(B).

Notification to the Immigration Court of Change of Address: You are required to notify the Immigration Court, in writing, of your full mailing address and telephone number (if any). You must also immediately notify the Immigration Court whenever you change your address or telephone number during the course of this proceeding by using Form EOIR-33/IC, Change of Address/Contact Information Form. Notices of hearing will be mailed to this address. If you file a Form EOIR-33/IC with the Immigration Court, you must serve a copy on the ICE Office of the Principal Legal Advisor. If you change your address or telephone number during the course of this proceeding and do not submit Form EOIR-33/IC, the Immigration Court shall not be required to provide you with written notice of your hearing. This obligation is in addition to your obligation to notify DHS of your change of address.

Failure to Appear: If you fail to attend the hearing at the date, time, and place designated on this notice, or any date, time, or place later directed by the Immigration Court, the Immigration judge shall order you removed in your absence upon determining that you were provided written notice and are removable. If you are arrested by ICE after being ordered removed in your absence by the Immigration judge pursuant to INA § 240(b)(5), you will be required to pay a minimum fee of \$5,000, adjusted for inflation, or a greater amount as established by the Secretary of Homeland Security.

Mandatory Duty to Depart the United States: If you become subject to a final order of removal as defined in 8 C.F.R. § 1241.1, you must depart the United States within 90 days of the order. If you do not depart, you may be subject to a civil penalty under INA § 274D(a) of \$500 per day, adjusted for inflation, and imprisonment of up to 4 years (or 10 years if you belong to certain specified classes described in INA § 237(a)(1)(E), (2), (3), or (4)). If you are granted voluntary departure, you must comply with the terms of the voluntary departure order. If you fail to voluntarily depart within the time provided, you will be subject to a final order of removal, may be ineligible for certain immigration benefits for a period of 10 years from the date you overstayed the order, and may be subject to a civil penalty from \$1,000 to \$5,000, adjusted for inflation. For additional information, refer to the order granting voluntary departure, as well as INA § 240B(d).

Sensitive Locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in INA § 239(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an Immigration Judge and request my hearing be scheduled.

Before:

(Signature of Respondent)

Date:

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on March 31, 2026, in the following manner and in compliance with section 239(a)(1) of the Act.

- ☒ In person ☐ by certified mail, returned receipt # _____ requested ☐ by regular mail
☐ Attached is a credible fear worksheet.
☒ Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the SPANISH language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

X [Signature]
(Signature of Respondent if Personally Served)

S. Bowling S 14981 BOWLING - Deportation
Officer
(Signature and Title of officer)

Privacy Act Statement

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorns>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

U.S. Department of Homeland Security

Continuation Page for Form I-862

Alien's Name MORALES SOLIS, RAMIRO	File Number 	Date 03/31/2026
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THE SERVICE ALLEGES THAT YOU:

reentry permit, border crossing card, or other valid entry document required by the Immigration and Nationality Act;

6. You are an immigrant not in possession of a valid unexpired passport, or other suitable travel document, or document of identity and nationality.

ON THE BASIS OF THE FOREGOING, IT IS CHARGED THAT YOU ARE SUBJECT TO REMOVAL FROM THE UNITED STATES PURSUANT TO THE FOLLOWING PROVISION(S) OF LAW:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

212(a)(7)(A)(i)(I) of the Immigration and Nationality Act (Act), as amended, as an immigrant who, at the time of application for admission, is not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act.

Signature D 8520 GONZALEZ 	Title (A) SDDO
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4 of 4 Pages

EXHIBIT B



**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
ORLANDO IMMIGRATION COURT**

Respondent Name:

MORALES SOLIS, RAMIRO

To:

Ivanor, Carlos Alfredo
1805 W Colonial Dr
Ste D
Orlando, FL 32804

A-Number:



Riders:

In Custody Redetermination Proceedings

Date:

04/21/2026

ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

- ☒ Denied, because
Lack of jurisdiction.
- ☐ Granted. It is ordered that Respondent be:
- ☐ released from custody on his own recognizance.
 - ☐ released from custody under bond of \$
 - ☐ other:
- ☐ Other:



Immigration Judge: Espinal, Pedro 04/21/2026

Appeal: Department of Homeland Security: ☒ waived ☐ reserved
Respondent: ☐ waived ☒ reserved

Appeal Due: 05/21/2026

Certificate of Service

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To: [] Alien | [] Alien c/o custodial officer | [E] Alien atty/rep. | [E] DHS

Respondent Name : MORALES SOLIS, RAMIRO | A-Number :



Riders:

Date: 04/21/2026 By: PEREZ, MYRNELIS, Court Staff



UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
ORLANDO IMMIGRATION COURT

Respondent Name:

MORALES SOLIS, RAMIRO

To:

Ivanor, Carlos Alfredo
1805 W Colonial Dr
Ste D
Orlando, FL 32804

A-Number:



Riders:

In Custody Redetermination Proceedings

Date:

04/21/2026

- ☐ Unable to forward - no address provided.
- ☒ Attached is a copy of the **decision of the Immigration Judge**. This decision is final unless an appeal is filed with the Board of Immigration Appeals within 30 calendar days of the date of the mailing of this written decision. See the enclosed forms and instructions for properly preparing your appeal. Your notice of appeal, attached documents, and fee or fee waiver request must be mailed to:

Board of Immigration Appeals
Office of the Clerk
P.O. Box 8530
Falls Church, VA 22041

- ☐ Attached is a copy of the decision of the immigration judge as the result of your Failure to Appear at your scheduled deportation or removal hearing. This decision is final unless a Motion to Reopen is filed in accordance with Section 242B(c)(3) of the Immigration and Nationality Act, 8 U.S.C. § 1252B(c)(3) in deportation proceedings or section 240(b)(5)(c), 8 U.S.C. § 1229a(b)(5)(c) in removal proceedings. If you file a motion to reopen, your motion must be filed with this court:

Immigration Court

- ☐ Attached is a copy of the decision of the immigration judge relating to a Reasonable Fear Review. Pursuant to 8 C.F.R. § 1208.31(g)(1), no administrative appeal is available.
- ☐ Attached is a copy of the decision of the immigration judge relating to a **Credible Fear Review**. This is a final order. No appeal is available.
- ☒ Other:

Bond Order

Date: 04/21/2026



Immigration Judge: Espinal, Pedro 04/21/2026

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Respondent Name : MORALES SOLIS, RAMIRO | A-Number :



Riders:

Date: 04/21/2026 By: PEREZ, MYRNELIS, Court Staff