

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

FILED

UNITED STATES DISTRICT COURT

for the
Eastern District of California

JUL 02 2026

Jorge Crisanto Montano Carrera

Petitioner

v.

WARDEN OF MESA VERDE DETENTION FACILITY;
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT;
DEPARTMENT OF HOMELAND SECURITY;
UNITED STATES OF AMERICA,

Respondent

(name of warden or authorized person having custody of petitioner)

CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY ED
DEPUTY CLERK

Case No. 1:26-CV-5089-DJC-CKD(11C)
(Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: Jorge Crisanto Montano Carrera
(b) Other names you have used: N/A
2. Place of confinement:
(a) Name of institution: Mesa Verde ICE Processing Center
(b) Address: 425 Golden State Avenue Bakersfield, CA 93301
- (c) Your identification number: [REDACTED]
3. Are you currently being held on orders by:
☒ Federal authorities ☐ State authorities ☐ Other - explain: _____
4. Are you currently:
☐ A pretrial detainee (waiting for trial on criminal charges)
☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced you: _____
(b) Docket number of criminal case: _____
(c) Date of sentencing: _____
☒ Being held on an immigration charge
☐ Other (explain): _____

Decision or Action You Are Challenging

5. What are you challenging in this petition:
☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

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- ☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
☐ Disciplinary proceedings
☐ Other (explain): _____

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: U.S. Immigration and Customs Enforcement (ICE)

Mesa Verde ICE Processing Center

(b) Docket number, case number, or opinion number: 

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):

Petitioner challenges his continued ICE/DHS immigration detention at Mesa Verde Detention Center since October 28, 2025, without a meaningful individualized custody determination or bond hearing. Petitioner does not challenge any disciplinary proceeding; therefore, no disciplinary penalties were imposed.

(d) Date of the decision or action: 10/28/2025

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☐ Yes ☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not appeal: Petitioner did not appeal because no direct administrative appeal was available that could provide prompt and meaningful relief from his continued ICE/DHS detention. Petitioner therefore seeks habeas relief under 28 U.S.C. § 2241.

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☐ Yes ☒ No

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(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a second appeal: Petitioner did not file a second appeal because no second administrative appeal was available or adequate to provide prompt relief from his continued ICE/DHS detention. Petitioner therefore seeks relief through this habeas petition under 28 U.S.C. § 2241.

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☐ Yes

☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a third appeal: _____

Petitioner did not file a third appeal because no third administrative appeal was available or adequate to provide prompt and meaningful relief from his continued ICE/DHS detention.

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes

☒ No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☐ Yes

☐ No

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If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

- (b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes

☐ No

If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

- (c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: _____

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☒ Yes

☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: 10/28/2025

(b) Date of the removal or reinstatement order: 05/28/2026

(c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes

☒ No

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If "Yes," provide:

(1) Date of filing: _____

(2) Case number: _____

(3) Result: _____

(4) Date of result: _____

(5) Issues raised: _____

(d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes

☒ No

If "Yes," provide:

(1) Name of court: _____

(2) Date of filing: _____

(3) Case number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☐ Yes

☒ No

If "Yes," provide:

(a) Kind of petition, motion, or application: _____

(b) Name of the authority, agency, or court: _____

(c) Date of filing: _____

(d) Docket number, case number, or opinion number: _____

(e) Result: _____

(f) Date of result: _____

(g) Issues raised: _____

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Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: SEE ATTACHMENT A

(a) Supporting facts (*Be brief. Do not cite cases or law.*):

(b) Did you present Ground One in all appeals that were available to you?

☐ Yes

☒ No

GROUND TWO: SEE ATTACHMENT A

(a) Supporting facts (*Be brief. Do not cite cases or law.*):

(b) Did you present Ground Two in all appeals that were available to you?

☐ Yes

☒ No

GROUND THREE: SEE ATTACHMENT A

(a) Supporting facts (*Be brief. Do not cite cases or law.*):

(b) Did you present Ground Three in all appeals that were available to you?

☐ Yes

☒ No

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GROUND FOUR: SEE ATTACHMENT A

(a) Supporting facts (*Be brief. Do not cite cases or law.*):

(b) Did you present Ground Four in all appeals that were available to you?

☐ Yes

☒ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: Petitioner did not present these grounds in all appeals because no available administrative appeal provided a prompt, adequate, or meaningful remedy for his continued ICE/DHS detention. These constitutional detention claims are properly raised through this habeas petition under 28 U.S.C. § 2241.

Request for Relief

15. State exactly what you want the court to do: SEE ATTACHMENT A

AO 242 (Rev. 09/17), Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

6/20/2024

I declare under penalty of perjury that I am the petitioner. I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date:

6/20/2024



of Petitioner

Signature of Attorney or other authorized person, if any

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

**GROUND IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS
UNDER 28 U.S.C. § 2241**

GROUND ONE

Prolonged Civil Immigration Detention Violates the Due Process Clause

Petitioner has been detained by ICE/DHS since October 28, 2025. His detention has continued for approximately eight months. Although a final order of removal was entered on or about May 28, 2026, Petitioner's detention did not begin on that date. The total period of civil immigration detention must be considered when determining whether continued custody remains reasonable under the Due Process Clause.

Civil immigration detention is not punishment. It must remain reasonably related to a legitimate government purpose. As the length of detention increases, due process requires a more meaningful justification for continued custody. Petitioner has remained detained without a constitutionally adequate individualized determination that continued detention is necessary.

Petitioner respectfully submits that his continued detention has become unreasonable because he has already spent many months in custody, has not received a meaningful custody determination, and remains separated from his family, who depends on him for financial and emotional support.

Therefore, Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment.

GROUND TWO

Petitioner's Voluntary Compliance With CBP Demonstrates That He Is Not a Flight Risk

Petitioner was not arrested while fleeing, hiding, or attempting to evade immigration authorities. He was directed by CBP to appear at Miami Deferred Inspections on October 28, 2025, and he complied with that official instruction. His appearance as directed demonstrates cooperation, good faith, and lack of flight risk. The CBP notice in the record confirms that Petitioner was scheduled to appear on October 28, 2025.

The government should not be permitted to claim that Petitioner is a flight risk while ignoring the fact that he appeared before immigration authorities when instructed to do so. Petitioner's conduct shows that he follows official instructions and is willing to comply with immigration supervision.

Petitioner has strong reasons to comply with all future requirements. He has family ties, a stable residence, community support, and significant family responsibilities in the United States. These facts support release under reasonable conditions of supervision.

GROUND THREE

Petitioner Is Not a Danger to the Community and Less Restrictive Alternatives Are Available

Petitioner does not pose a danger to the community. He has family support, community support, employment history, and responsibilities as the principal financial provider for his household. His family depends on him for economic support, daily stability, and emotional support.

The government has not provided a meaningful individualized determination proving that Petitioner is dangerous or that detention is necessary. Continued detention should not be based on a general or automatic decision. It must be justified by the specific facts of Petitioner's case.

Less restrictive alternatives are available. Petitioner can comply with ICE check-ins, address updates, reporting requirements, electronic monitoring if necessary, or any other reasonable condition. These alternatives would protect the government's interests without unnecessarily continuing Petitioner's detention.

Because Petitioner is not a danger to the community and less restrictive alternatives exist, continued detention is excessive and violates due process.

GROUND FOUR

The Government Has Failed to Provide a Meaningful Individualized Custody Review

Petitioner remains detained without a meaningful individualized custody determination. Any custody review must consider the actual facts of Petitioner's case, including his total time in detention, voluntary compliance with CBP, lack of danger, lack of flight risk, family ties, community support, and the availability of alternatives to detention.

A custody review is not meaningful if it simply repeats the conclusion that Petitioner should remain detained without considering his individual circumstances. Due process requires more than a formality. It requires a real evaluation of whether continued detention is necessary.

Petitioner is the principal financial support for his family. His detention has caused serious hardship to his household. That hardship is relevant because it demonstrates family stability, community ties, and strong reasons to comply with all future immigration requirements.

Petitioner respectfully requests that the Court require Respondents to provide a constitutionally adequate individualized custody review or order his release under reasonable conditions.

GROUND FIVE

The Court Should Require Respondents to Justify Continued Detention and Should Order Release Under Reasonable Conditions or, in the Alternative, a Meaningful Individualized Custody Hearing

Petitioner acknowledges that a final order of removal was entered on or about May 28, 2026. Petitioner does not claim an automatic right to a traditional immigration bond hearing before the Immigration Court as if his removal proceedings were still pending. Rather, Petitioner challenges his continued civil immigration detention under 28 U.S.C. § 2241 and the Due Process Clause because he has been detained since October 28, 2025 without a meaningful individualized determination that continued detention is necessary.

The government should be required to explain why continued detention is necessary in light of Petitioner's total time in custody, his voluntary compliance with CBP, his lack of danger, his lack of flight risk, his family and community ties, his role as the primary financial provider for his family, and the availability of less restrictive alternatives

If Respondents cannot justify continued detention with a meaningful individualized showing that Petitioner is a danger to the community or a flight risk, this Court should order Petitioner released under reasonable conditions of supervision. Such conditions may include ICE check-ins, reporting requirements, address updates, electronic monitoring if necessary, or any other reasonable condition the Court finds appropriate.

In the alternative, if the Court does not order immediate release, Petitioner respectfully requests a prompt and meaningful individualized custody hearing before a neutral decision-maker, where the government must justify continued detention and where Petitioner may present evidence of his lack of danger, lack of flight risk, family responsibilities, community ties, and available alternatives to detention.

Request for Relief

Petitioner respectfully requests that this Court assume jurisdiction over this habeas petition, order Respondents to show cause why he continues to be detained, and find that his continued detention without a meaningful individualized custody determination violates due process. Petitioner asks the Court to order his release under reasonable conditions of supervision if Respondents cannot justify his continued detention by showing that he is a danger to the community or a flight risk. In the alternative, Petitioner requests a prompt and meaningful individualized custody hearing or custody review that considers his total time in detention, voluntary compliance with CBP, family and community ties, role as the primary financial provider for his family, lack of danger, lack of flight risk, and available alternatives to detention. Petitioner also requests any other relief the Court deems just and proper.

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

JORGE CRISANTO MONTANO CARRERA, Petitioner,
v.
WARDEN OF MESA VERDE DETENTION CENTER, et al., Respondents.

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Exhibit B: EOIR Case Information and Removal Order Date.

Exhibit C: CBP Notice to Appear at Deferred Inspections.

Exhibit D: Minor Child Birth Certificate / Family Relationship Evidence.

Exhibit E: Declaration of Katerine Vega Reyes with Translation and ID.

Exhibit F: Good Moral Character Letter - Yuleni Guillen.

Exhibit G: Good Moral Character Letter - Delio Elia Ramirez.

Exhibit H: Employment Letter - A&M; Quintero Solutions Corp. .

Exhibit I: Good Moral Character Letter - Ernesto German Vega Riveron.

Exhibit J: Petitioner Personal Declaration.

Exhibit K: Declaration of Angelica Narcisa Carrera Martinez with Translation
and ID.

Exhibit L: Medical Records of Angelica Narcisa Carrera Martinez.

EXHIBIT A

Current Detention Location

DHS/ICE detainee locator information showing Petitioner is detained at Mesa Verde Detention Center, 425 Golden State Ave, Bakersfield, CA 93301.

 Official Website of the Department of Homeland Security



Report

Main Menu

[<VOLVER A RESULTADOS](#)

Página del Centro

Detention Information For:

JORGE CRISANTO MONTANO-CARRERA

País de Nacimiento: Cuba

Número A: 

Centro de Detención Actual:

Mesa Verde Detention Center

425 Golden State Ave

NA

Bakersfield, CA 93301

Información para Visitantes (661) 859-1028

[MÁS INFORMACIÓN>](#)

Información de la Oficina ERO

Los familiares y representantes legales pueden obtener información adicional sobre el caso de esta persona poniéndose en contacto con esta oficina de ERO:

ERO - Bakersfield, CA IHP Sub Office

Número de Teléfono (661) 281-6500



EXHIBIT B

EOIR Case Information and Removal Order Date

EOIR Automated Case Information showing no future hearings, removal ordered May 28, 2026, and BIA appeal due June 29, 2026.

 An official website of the United States government
Here's how you know 



EOIR | Automated Case Information

Court Closures Today: June 27, 2026

Please check <https://www.justice.gov/eoir-operational-status> for up to date closures.

[Home](#) > **MONTANO-CARRERA, JORGE (201-300-124)**



Automated Case Information

Name: MONTANO-CARRERA, JORGE | **A-Number:** 
| **Docket Date:** 11/18/2025



Next Hearing Information



There are no future hearings for this case.



Court Decision and Motion Information

The immigration judge ordered **REMOVAL**.

DECISION DATE

May 28, 2026

COURT ADDRESS

18201 SW 12TH ST, BLDG 1 STE C
MIAMI, FL 33194

 BIA Case Information

An appeal is due by June 29, 2026.

 Court Contact Information

If you require further information regarding your case, or wish to file additional documents, please contact the immigration court.

COURT ADDRESS

18201 S.W. 12TH ST
MIAMI, FL 33194

PHONE NUMBER

(786) 422-8700

[Archive](#)

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[Information Quality](#)

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EXHIBIT C

CBP Notice to Appear at Deferred Inspections

CBP notice dated September 23, 2025, directing Petitioner to appear at Miami Deferred Inspections on October 28, 2025.

6601 NW 25th Street
Miami, FL 33122



**U.S. Customs and
Border Protection**

Jorge Montano Carrera



September 23, 2025

Dear Mr. Jorge Montano Carrera,

You have been scheduled to appear at Miami Deferred Inspections on October 28, 2025, at 8:00 AM. Please be advised that you must appear at Miami Deferred Inspections to complete your immigration inspection. Please bring your passport, Lawful Permanent Resident cards/ADIT stamp. Please bring any medications that you take. Please call us at 305-906-2573 or 305-218-7884 and ask to speak to CBP Officer Baquedano.

Our address is located at:

**3550 NW 57th Avenue, Building 841,
Miami, Florida, 33166.**

**CBP Officer Baquedano
US Customs and Border Protection
Miami Deferred Inspections
3550 NW 57th Avenue, Building 841,
Miami, Florida, 33166
305-906-2573**

EXHIBIT E

Declaration of Katerine Vega Reyes with Translation and ID

Family support declaration stating Petitioner is a father, partner, and principal support for the household, with translation certificate and identification.

Monday, October 27, 2025

To Whom It May Concern / U.S. Border Patrol Department

I, Katerine Vega Reyes, born on [REDACTED] (31 years old), residing at [REDACTED] hereby state that I have been the partner of Jorge Montano Carrera for several years, and we live together as a stable family along with our youngest son, [REDACTED] 8 years old, as well as with Jorge's mother, [REDACTED] 64 years old.

I wish to express that Jorge is an exemplary father, fully involved in the emotional and financial upbringing and support of our household, in addition to providing all necessary assistance to his mother, who depends on him both physically and financially. Jorge has always been a fundamental pillar of our family, responsible for ensuring our well-being, stability, and unity.

The prolonged absence of Jorge would cause a serious emotional, financial, and family impact, directly affecting our young son and his mother, both of whom depend on his daily presence and support. His role as the family provider is essential to our lives, and our family unit would be deeply affected in the event of separation.

For all the reasons stated above, I respectfully request that our family situation be taken into consideration and that Jorge be allowed to remain in the country with his family, who depend on him.

Without further ado, I sincerely thank you for your attention to this request.

Sincerely,

[SIGNATURE]

Katerine Vega Reyes

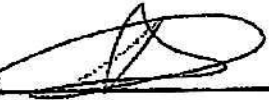
CERTIFICATE OF TRANSLATION

I, Alejandro E. Perez Alfonso, hereby certify that I translated the attached document from Spanish into English and that, to the best of my ability, it is a true and correct translation. I further certify that I am competent in both Spanish and English to render and certify the translation of this Declaration.

Alejandro E. Perez Alfonso

Date: 10/27/2025

Signature



8700 W Flagler St, Suite 380 Miami Florida 33174

Phone: 305 883 7272

STATE OF FLORIDA
COUNTY OF Miami Dade

The foregoing instrument was acknowledged before
me this 27 day of Oct, 2025, by Alejandro Perez

Notary Public's Signature

Personally Known OR

Type of Identification Produced ARIDIS DOMINGUEZ

Notary Name

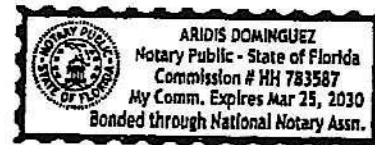


EXHIBIT F

Good Moral Character Letter - Yuleni Guillen

Community support and good moral character letter with identification.

To: U.S. Citizenship and Immigration Services (USCIS)
Subject: Letter of Good Moral Character for Mr. Jorge Montano

To Whom It May Concern,

My name is Yuleni Guillén, and I am a United States citizen. I am writing this letter to attest to the good moral character of Mr. Jorge Montano.

I have known Mr. Montano for more than 15 years, during this time I have come to know him as an honest, responsible, and law-abiding individual. He consistently demonstrates respect for others and for the laws of this country. His behavior in the community has always been exemplary, and he is known for his integrity, strong work ethic, and dedication to his family.

Mr. Montano is a trustworthy and compassionate person who is always willing to help others. He contributes positively to those around him and maintains high moral standards in both his personal and professional life.

Based on my personal knowledge and experience, I can confidently state that Mr. Jorge Montano is a person of good moral character. I respectfully ask that you take this letter into consideration in support of his case.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,

Yuleni Guillen Herrera

Date: 03/26/ 2026

STATE OF FLORIDA
COUNTY OF Pinellas

The foregoing instrument was acknowledged before
me this 26 day of March, 2026, by Yuleni Guillen

Notary Public's Signature

Notary Name

Personally Known OR

Type of Identification Produced USA passport

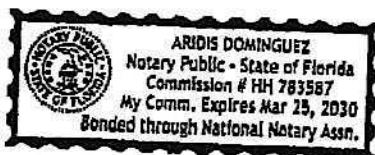


EXHIBIT G

Good Moral Character Letter - Delio Elia Ramirez

Community support and good moral character letter with identification.

Hialeah, FL
Date: 05/13/2026

Honorable Immigration Judge:

I respectfully write to express my strong support for Jorge Crisanto Montano Carrera and to attest to his good moral character in the context of his immigration proceedings before this Honorable Court.

My name is Delio Elia Ramirez, and I am a United States citizen. I have had the privilege of knowing Jorge Crisanto Montano Carrera for approximately four years as a close friend. During this time, I have been able to closely observe his conduct, values, and strong sense of responsibility.

Throughout these years, Jorge has demonstrated that he is an honest, hardworking, and committed individual, both to his family and his community. He is a trustworthy person who respects others and follows the law. He is always willing to support those around him, showing kindness and a genuine desire to do what is right at all times.

Furthermore, I can affirm that he is deeply devoted to his family. His presence is essential to the emotional and financial well-being of his household. His absence would represent a significant hardship and negative impact on his loved ones, who depend on him both emotionally and financially.

I understand that every individual may face challenges or make mistakes; however, what truly defines a person is their ability to learn from those experiences and grow. I have witnessed Jorge's commitment to personal development and his determination to lead a law-abiding life.

For all these reasons, I respectfully ask this Honorable Court to consider this testimony when reviewing his case. I firmly believe that Jorge Crisanto Montano Carrera is a person of good moral character who deserves the opportunity to remain in the United States with his family and continue being a positive member of society.

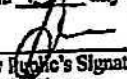
Please feel free to contact me if further information is required.

Sincerely,


Delio Elia Ramirez

STATE OF FLORIDA
COUNTY OF Miami Dade

The foregoing instrument was acknowledged before me this 13 day of May, 2026, by Delio Elia Ramirez


Notary Public's Signature

Aridis Dominguez
Notary Name

Personally Known

OR

Type of Identification Produced

☒ FL Driver's Lic

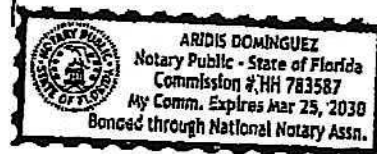


EXHIBIT I

Good Moral Character Letter - Ernesto German Vega Riveron

Community support and good moral character letter with identification.

Hialeah, FL

Date: 05/13/2026

Honorable Immigration Judge:

I respectfully write to express my strong support for Jorge Crisanto Montano Carrera and to attest to his good moral character in the context of his immigration proceedings before this Honorable Court.

My name is Ernesto Germán Vega Riveron, and I am a United States citizen. I am related to Mr. Montano Carrera through his wife, as I am her cousin. I have had the privilege of knowing him for approximately 10 years, during which time I have been able to closely observe his conduct, values, and sense of responsibility.

Throughout these years, Jorge Crisanto Montano Carrera has demonstrated that he is an honest, hardworking, and committed individual to both his family and his community. He is a trustworthy person who respects others and the law, and he is always willing to support those around him. His behavior reflects integrity and a genuine desire to do what is right at all times.

Furthermore, I can affirm that he is deeply devoted to his family. His presence is essential to the emotional and financial well-being of his household. His absence would represent a significant hardship and negative impact on his loved ones, who depend on him both emotionally and financially.

I understand that every individual may face challenges or make mistakes; however, what truly defines a person is their ability to learn from those experiences and grow. I have witnessed Jorge's commitment to personal development and his determination to lead a law-abiding life.

For all these reasons, I respectfully ask this Honorable Court to consider this testimony when reviewing his case. I firmly believe that Jorge Crisanto Montano Carrera is a person of good moral character who deserves the opportunity to remain in the United States with his family and continue being a positive member of society.

Please feel free to contact me if further information is required.

Sincerely,

Ernesto Germán Vega Riveron

STATE OF FLORIDA
COUNTY OF Miami Dade

The foregoing instrument was acknowledged before me this 13 day of May, 2026 by Ernesto G. Vega

Notary Public's Signature
Personally Known OR
Type of Identification Produced ✓

Notary Name

Ardis Dominguez

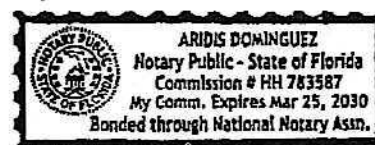


EXHIBIT J

Petitioner Personal Declaration

Petitioner declaration explaining no intention to flee, family dependence, and willingness to comply with all court and immigration requirements.

Honorable Immigration Judge:

My name is Jorge Crisanto Montano Carrera, and with the utmost request, I humbly address this honorable court to request the opportunity to remain free on bond while I continue with my Immigration proceedings.

I sincerely wish to express that I have no intention of missing court or evading justice in any way. I fully understand the importance of this process, and I am completely willing to comply with every requirement, condition, and hearing ordered by this honorable court.

The most important thing in my life is my family. I am the husband of [REDACTED] a Lawful Permanent Resident, and together we have built a home based on love, respect, and honest work. We have a 9 year-old son, [REDACTED] who depends deeply on me both emotionally and financially. As his father, I have always worked hard to provide him with stability, support and a better future. My son is going through very difficult moments because of this situation. He needs his father's presence in his daily life to guide him, support him, and provide him with emotional stability. The thought of being separated from him causes me profound pain, because I have always worked to give him a better future and to be a positive example in his life.

I am also deeply concerned about my mother, [REDACTED] who is 66 years old. Our family is very close, and I have always tried to be present to support and help her in every possible way. It has never been my intention to have problems with the law. I am a hardworking, responsible person who committed to family and community. I promise before this honorable court to maintain good conduct, obey all laws, and appear punctually at every appointment or hearing scheduled for me.

I humbly ask that you consider the emotional and family impact that this situation is having on my wife, son, and my mother. My only wish is to continue fighting my case legally and responsibly while remaining by the side of my family, who deeply needs me.

I sincerely thank you for your time, your consideration, and the opportunity to be heard.

Respectfully,

Jorge Crisanto Montano Carrera A# [REDACTED]

X

Jorge Crisanto Montano Carrera

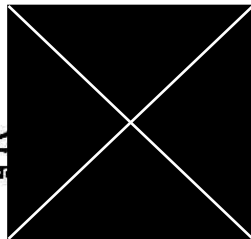


EXHIBIT K

Declaration of Angelica Narcisa Carrera Martinez with Translation and ID

Mother's declaration showing family dependence on Petitioner for financial support, transportation, and care, with translation and identification.

To Whom It May Concern:

I, Angelica Narcisa Carrera Martinez, Cuban citizen, holder of Florida ID License No. [REDACTED] currently 64 years old, hereby state and certify that I am the biological mother of Jorge Montano Carrera, born on [REDACTED] who is a lawful permanent resident of the United States of America.

I am also the grandmother of his only son, [REDACTED] born on [REDACTED] an 8 years old minor, and the mother-in-law of his wife, [REDACTED] who is also a lawful permanent resident of the United States.

We all reside at the same address:

[REDACTED]

I wish to state that my son, Jorge Montano, is the person fully responsible for the financial and economic support of our household, as he covers the expenses and basic needs of all family members, due to the following circumstances:

- My daughter-in-law, [REDACTED] is currently studying full-time.
- My grandson, [REDACTED] is a minor who requires constant care and attention.
- I suffer from chronic medical conditions, including hypertension, cataracts, and glucose/diabetes issues, which limit my ability to work.
- My current personal situation does not allow me to obtain stable or full-time employment; therefore, I am financially dependent on my son.
- My son provides transportation to my medical appointments, gives me personal assistance, and ensures that I receive all the necessary care for my physical and emotional well-being.

For the reasons stated above, I respectfully request that our family and financial situation be taken into consideration. We deeply appreciate any understanding and support given to our case.

I remain available for any clarification or additional information at the following phone number: [REDACTED]

Sincerely,

[SIGNATURE]

Angelica Narcisa Carrera Martinez
October 27, 2025

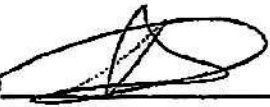
CERTIFICATE OF TRANSLATION

I, Alejandro E. Perez Alfonso, hereby certify that I translated the attached document from Spanish into English and that, to the best of my ability, it is a true and correct translation. I further certify that I am competent in both Spanish and English to render and certify the translation of this Declaration.

Alejandro E. Perez Alfonso

Date: 10/27/2025

Signature



8700 W Flagler St, Suite 380 Miami Florida 33174

Phone: 305 883 7272

STATE OF FLORIDA
COUNTY OF Miami Dade

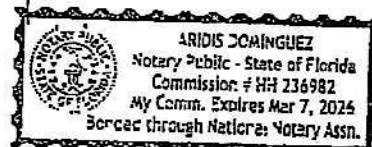
The foregoing instrument was acknowledged before
me this 27 day of OCT, 2025, by Alejandro E. Perez Alfonso

Notary Public's Signature

Notary Name

Personally Known OR

Type of Identification Produced



**UNITED STATES DISTRICT COURT
Eastern District of California**

Jorge Crisanto Montano Carrera

Petitioner,

v.

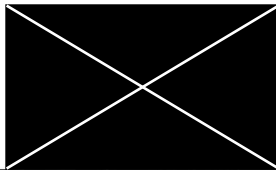
WARDEN, MESA VERDE ICE PROCESSING CENTER,
FIELD OFFICE DIRECTOR, MIAMI FIELD OFFICE, U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT;
DIRECTOR, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; et, al
Respondents.

CERTIFICATE OF SERVICE

I hereby certify that on this 27th day of June, 2026, I served a true and correct copy of the
Petition for Writ of Habeas Corpus, together with all supporting documents, by depositing
them in the United States Mail, properly addressed to the following:

United States Attorney's Office
Eastern District of California – Fresno Office
Robert E. Coyle United States Courthouse
2500 Tulare Street, Suite 4401
Fresno, CA 93721

Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001



Document Preparer - Non-Attorney
Dileymis Martinez