

FILED

JUL 21 2026
CLERK/U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY  DEPUTY CLERK

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

MARTIN ALEXIS BURGOS MANCHEGO
Petitioner

EP 26 CV 1955

v. 

WARDEN OF EAST MONTANA DETENTION CENTER (ICE)
6920 Digital Rd.
El Paso, TX 79936

Respondent

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

Personal Information

1. Full Name: MARTIN ALEXIS BURGOS MANCHEGO
2. A-Number: 
3. Institution: East Montana Detention Center / ERO El Paso Camp East Montana
4. Address: 6920 Digital Rd., El Paso, TX 79936
5. Custody: Federal immigration detention (ICE).

Decision or Action Challenged

Petitioner challenges his prolonged and indefinite immigration detention following a final order of removal, without a bond hearing and without a reasonable likelihood of removal in the foreseeable future. ICE officers have verbally informed him of a final removal order but have refused to provide a copy despite three requests.

Grounds for Relief

GROUND ONE – Violation of Due Process – Prolonged Detention

Petitioner remains detained for a prolonged period, violating the Due Process Clause of the Fifth Amendment.

GROUND TWO – Unlawful Indefinite Detention under Zadvydas v. Davis

There is no significant likelihood that removal will occur in the reasonably foreseeable future. Continued detention is unconstitutional under *Zadvydas v. Davis*, 533 U.S. 678 (2001).

GROUND THREE – Denial of Bond Hearing

Petitioner has not received a meaningful custody or bond hearing to challenge the legality of his continued detention.

GROUND FOUR – Denial of Access to Final Removal Order

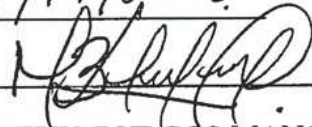
ICE has refused to provide Petitioner with a copy of the Immigration Judge's final removal order despite three requests, preventing him from meaningfully challenging his detention.

Request for Relief

1. Grant this Petition for Writ of Habeas Corpus;
2. Order Petitioner's immediate release from ICE custody; or, alternatively,
3. Order an immediate bond hearing before an Immigration Judge or other appropriate authority;
4. Grant any other relief the Court deems just and proper.

Declaration Under Penalty of Perjury

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

Date: 07/17/2026
Signature: 
MARTIN ALEXIS BURGOS MANCHEGO
A-Number: 

DECLARATION OF MARTIN ALEXIS BURGOS MANCHEGO

I, **MARTIN ALEXIS BURGOS MANCHEGO**, A-Number A [REDACTED] being of legal age and currently detained by U.S. Immigration and Customs Enforcement (ICE), declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of my knowledge:

1. I am a native and citizen of **Venezuela**. I make this declaration in support of my Petition for a Writ of Habeas Corpus under 28 U.S.C. § 2241.
2. I fear returning to Venezuela because I believe I would face serious harm due to my political opinions and activities. Based on my experiences and the conditions in my country, I believe my return would place my life and freedom in immediate danger.
3. I respectfully state that I cannot safely return to Venezuela for the following reasons:

First:

I fear that I would be **arbitrarily arrested or deprived of my liberty** by Venezuelan authorities because of my political activities and my opposition to the current government. I believe I would be identified as a political opponent and targeted because of my past conduct and opinions.

Second:

I fear that I would be subjected to **torture, cruel, inhuman, or degrading treatment**, or other forms of abuse while in government custody. Based on my understanding of the situation in Venezuela and my personal circumstances, I believe there is a substantial risk that I would suffer severe physical or psychological harm if returned.

Third:

I fear **persecution and retaliation by government authorities or groups acting with the acquiescence or tolerance of the government** because of my political beliefs. I believe I would not receive effective protection from the Venezuelan authorities and that returning would expose me to serious violations of my fundamental human rights.

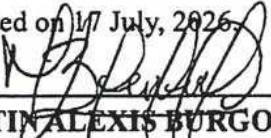
4. Because of these circumstances, I believe that my removal to Venezuela would expose me to a substantial risk of persecution, torture, imprisonment, or other serious human rights violations.
5. I also remain detained by ICE under a final order of removal. Despite requesting a copy of the Immigration Judge's final order on multiple occasions, I have not been provided with that document. Without access to the order, my ability to understand and challenge my detention has been significantly impaired.
6. I respectfully request that this Court consider the serious risks I would face if removed to Venezuela, together with the prolonged nature of my immigration

detention and the constitutional concerns raised in my Petition for Writ of Habeas Corpus.

7. My fear of returning to Venezuela is also supported by internationally recognized human rights organizations, including Amnesty International, Human Rights Watch, and the United Nations Independent International Fact-Finding Mission, all of which continue to document arbitrary detention, torture, political persecution, and serious violations of due process against individuals perceived to oppose the Venezuelan government.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on 17 July, 2026.


MARTIN ALEXIS BURGOS MANCHEGO

A-Number: 

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
BOARD OF IMMIGRATION APPEALS**

**Office of the Clerk
5107 Leesburg Pike, Suite 2000
Falls Church, Virginia 22041**

In the Matter of:

MARTIN ALEXIS BURGOS MANCHEGO

File A Number: 

**RESPONDENT'S PRO SE MOTION TO REOPEN OR, IN THE ALTERNATIVE,
MOTION TO REMAND**

**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
BOARD OF IMMIGRATION APPEALS**

In the Matter of:

MARTIN ALEXIS BURGOS MANCHEGO

A#: 

**RESPONDENT'S PRO SE MOTION TO REOPEN OR, IN THE ALTERNATIVE,
REMAND**

I. INTRODUCTION

The Respondent respectfully requests that the Board reopen or remand these proceedings pursuant to the applicable provisions of the Immigration and Nationality Act and 8 C.F.R. because reopening is necessary in the interest of justice, to permit consideration of additional corroborating evidence and materially changed country conditions in Venezuela.

II. PROCEDURAL HISTORY

The Immigration Judge denied asylum, withholding of removal, and CAT protection. A timely appeal was filed before the Board. This Motion accompanies the appeal and requests reopening or remand for consideration of additional evidence unavailable or not fully developed during the merits hearing.

III. GROUNDS FOR REOPENING

- A. Additional corroborating evidence.
- B. Material deterioration of country conditions in Venezuela.
- C. Due process requires a full opportunity to present all relevant evidence.
- D. Any credibility concerns can be clarified with additional documentation and testimony.

IV. CHANGED COUNTRY CONDITIONS

Since Respondent's proceedings, Venezuela has experienced a significant increase in political repression. Independent reports document arbitrary arrests, killings of protesters, enforced disappearances, torture, persecution of political opponents, censorship, and

widespread human rights abuses. Human Rights Watch further reports post-election repression, thousands of politically motivated arrests, humanitarian deterioration, and continuing persecution of critics. The recently enacted Organic Law of Liberator Simón Bolívar creates additional criminal exposure and political sanctions for persons perceived as opposing the government. These developments materially increase Respondent's risk upon return.

V. LEGAL ARGUMENT

The Board possesses authority to reopen or remand proceedings when new material evidence could affect eligibility for relief. The additional documentary evidence regarding Venezuela, together with corroborating evidence Respondent intends to submit, warrants reopening so the Immigration Court may evaluate the complete record.

VI. REQUEST FOR RELIEF

The Respondent respectfully requests that the Board grant this Motion to Reopen or, alternatively, remand these proceedings to the Immigration Court for a new merits hearing permitting submission of additional corroborating evidence and updated country condition evidence.

VII PROPOSED EXHIBITS

- Exhibit A – Amnesty International, *Venezuela 2025 Human Rights Report*
- Exhibit B – Human Rights Watch, *World Report 2026 – Venezuela*
- Exhibit C – United Nations Independent International Fact-Finding Mission on Venezuela
- Exhibit D – Human Rights Watch Report, *Exclusions, Procedures Mar Amnesty Law* (2026)



MARTÍN ALEXIS BURGOS MANCHEGO

Respondent Pro Se

A#:

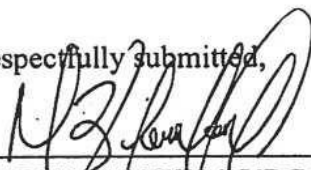


CERTIFICATE OF SERVICE

I certify that a copy of this Motion was served upon the Department of Homeland Security,
Office of Chief Counsel 6920 digital Rd El Paso Tx 79936

by MAIL (Method of delivery)

Respectfully submitted,



MARTHA ALEXIS BURGOS MANCHEGO
Respondent Pro Se
A#: 

#1

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement
ORDER OF RELEASE ON RECOGNIZANCE

File No.:

Date: Oct 27, 2023Name: BURGOS MANCHEGO, MARTIN

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

- ☒ You must report for any hearing or interview as directed by Immigration and Customs Enforcement or the Executive Office for Immigration Review.
- ☒ You must surrender for removal from the United States if so ordered.
- ☒ You must report in (writing) (person) to Duty officer at Kansas City Sub Office On December 14, 2023, 09:30 AM as directed.

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

- ☒ You must not change your place of residence without first securing written permission from the officer listed above.
- ☒ You must not violate any local, State or Federal laws or ordinances.
- ☒ You must assist Immigration and Customs Enforcement in obtaining any necessary travel documents.
- ☒ Other: *Your release is contingent upon your enrollment and successful participation in an Alternatives to Detention (ATD) program as designated by the U.S. Department of Homeland Security. As part of the ATD program, you will be subject to electronic monitoring and may be subject to a curfew. Failure to comply with the requirements of the ATD program will result in a redetermination of your release conditions or your arrest and detention.*

If fitted with a U.S. Immigration and Customs Enforcement GPS tracking ankle bracelet, do not tamper with or remove the device. Under federal law, it is a crime to willfully damage or attempt to damage property of the United States. Damaging or attempting to damage the GPS tracking ankle bracelet or any of its associated equipment (including, but not limited to, the charging station, batteries, power cords, etc.) may result in your arrest, detention, and prosecution under 18 U.S.C. § 1361 and/or 18 U.S.C. § 641, each punishable by a fine, up to ten years imprisonment, or both.

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

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

R. Duckworth
SDDO

(Name and Title of ICE Official)

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

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

Jason Joyce

(Signature of ICE Official Serving Order)

Oct 27, 2023

Date

Martin A. Burgos M.

(Signature of Alien)

I hereby cancel this order of release because:

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

(Signature of ICE Official Cancelling Order)

Date

DECLARATION OF MARTIN ALEXIS BURGOS MANCHEGO

I, **MARTIN ALEXIS BURGOS MANCHEGO**, A-Number  being of legal age and currently detained by U.S. Immigration and Customs Enforcement (ICE), declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of my knowledge:

1. I am a native and citizen of **Venezuela**. I make this declaration in support of my Petition for a Writ of Habeas Corpus under 28 U.S.C. § 2241.
2. I fear returning to Venezuela because I believe I would face serious harm due to my political opinions and activities. Based on my experiences and the conditions in my country, I believe my return would place my life and freedom in immediate danger.
3. I respectfully state that I cannot safely return to Venezuela for the following reasons:

First:

I fear that I would be **arbitrarily arrested or deprived of my liberty** by Venezuelan authorities because of my political activities and my opposition to the current government. I believe I would be identified as a political opponent and targeted because of my past conduct and opinions.

Second:

I fear that I would be subjected to **torture, cruel, inhuman, or degrading treatment**, or other forms of abuse while in government custody. Based on my understanding of the situation in Venezuela and my personal circumstances, I believe there is a substantial risk that I would suffer severe physical or psychological harm if returned.

Third:

I fear **persecution and retaliation by government authorities or groups acting with the acquiescence or tolerance of the government** because of my political beliefs. I believe I would not receive effective protection from the Venezuelan authorities and that returning would expose me to serious violations of my fundamental human rights.

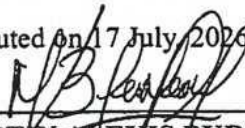
4. Because of these circumstances, I believe that my removal to Venezuela would expose me to a substantial risk of persecution, torture, imprisonment, or other serious human rights violations.
5. I also remain detained by ICE under a final order of removal. Despite requesting a copy of the Immigration Judge's final order on multiple occasions, I have not been provided with that document. Without access to the order, my ability to understand and challenge my detention has been significantly impaired.
6. I respectfully request that this Court consider the serious risks I would face if removed to Venezuela, together with the prolonged nature of my immigration

detention and the constitutional concerns raised in my Petition for Writ of Habeas Corpus.

7. My fear of returning to Venezuela is also supported by internationally recognized human rights organizations, including Amnesty International, Human Rights Watch, and the United Nations Independent International Fact-Finding Mission, all of which continue to document arbitrary detention, torture, political persecution, and serious violations of due process against individuals perceived to oppose the Venezuelan government.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on 17 July 2026.



MARTIN ALEXIS BURGOS MANCHEGO

A-Number: 

EXHIBIT A

**Amnesty International, Venezuela 2025 Human Rights
Report**



VENEZUELA 2025

Crimes against humanity persisted and were committed with impunity. All branches of the state continued to persecute and severely punish real or perceived dissent against the government of Nicolás Maduro. Hundreds of people suffered arbitrary detention or enforced disappearance, as well as torture and other human rights violations, for opposing or criticizing the government. Many of these individuals were subjected to criminal proceedings that lacked judicial guarantees, being denied counsel of their own choosing, access to information on the charges against them, or the right to appear before an independent tribunal. Human rights defenders and journalists continued to be one of the main targets of the government's policy of repression. Around 7.9 million Venezuelan refugees had fled the country since 2015. The humanitarian crisis persisted, with almost two million people dependent on international aid. No progress was made on sexual and reproductive rights. Discrimination against the LGBTI population and Indigenous Peoples continued and there was no legislative progress to promote their rights. Illegal mining and environmental devastation continued to generate concern.

Background

Claims persisted regarding the results of the 2024 presidential election. Parliamentary and regional elections were held in March and July, respectively, in an environment of repression similar to that of the presidential elections.

From 2 September, the USA carried out air strikes in the Caribbean and the Pacific on 34 vessels allegedly transporting drugs from Latin America to the USA, resulting in the extrajudicial killing of at least 110 people. US president Donald Trump attempted to justify these attacks by citing potential risk to life in his country. Tensions between the two governments increased due to the aggressive rhetoric used and the fact that the attacks were carried out off the coast of Venezuela, mostly against vessels and crew the majority of which were likely to be Venezuelan.

In January, the Inter-American Commission on Human Rights submitted a report on human rights violations committed during the 2024 electoral period. The report

examined the authorities' repressive strategy to prevent political participation by the opposition, hinder the development of a free electoral contest and instil fear among citizens. In September, the commission sought approval for a visit to the country to observe the human rights situation there. In August, the Inter-American Court of Human Rights reaffirmed its jurisdiction over Venezuela. In September and December respectively, the Independent International Fact-Finding Mission on the Bolivarian Republic of Venezuela submitted two reports documenting the human rights violations committed during the post-election repression and the role played by the Bolivarian National Guard in the commission of crimes against humanity.

Both the Office of the Prosecutor of the ICC and OHCHR, the UN human rights office, announced the closure of their respective country offices.

The Nobel Peace Prize was awarded to opposition leader María Corina Machado, who had been disqualified from participating in the 2024 presidential elections and suffered persecution.

Repression of dissent

The government continued to exercise widespread repression against political dissent, resulting in serious human rights violations and crimes against humanity. The authorities continued to use the state apparatus, including the security and intelligence forces, the judicial system and restrictive laws, as well as groups of armed civilians, to repress, silence and punish dissent and the defence of human rights.

Arbitrary detention

Politically motivated arbitrary detentions persisted, although fewer than in 2024. In December, the government announced the release of multiple detainees, with the NGO Foro Penal verifying 117 releases. Of more than 2,000 people arbitrarily detained following the 2024 presidential election, at least 806 remained in illegal detention as of 31 December. Those released were still subject to criminal proceedings.

In most cases, detainees were charged with vague and unfounded crimes, such as "terrorism" or "treason", which carried severe penalties. Criminal proceedings continued to lack due process guarantees. Detainees were assigned public defenders lacking capacity or motivation to act effectively. Defendants were tried in courts that lacked independence, including those known as "anti-terrorism courts", and they were denied knowledge of the charges and evidence against them, among other rights violations.

In addition to the use of state security forces and detention centres, the instrumentalization of the Public Prosecutor's Office as a means for political persecution and of the judiciary as an enforcement mechanism was key in the implementation of the government's policy of repression against political dissent, allegedly to "fight terrorism". The involvement of senior state officials in identifying

carecían de independencia, incluidos los conocidos como “tribunales antiterroristas”, y se les negó el conocimiento de los cargos y las pruebas en su contra, entre otras violaciones de derechos.

In addition to the use of state security forces and detention centres, the instrumentalization of the Public Prosecutor's Office as a means for political persecution and of the judiciary as an enforcement mechanism was key in the implementation of the government's policy of repression against political dissent, allegedly to “fight terrorism”. The involvement of senior state officials in identifying and publicly stigmatizing victims of repression demonstrated the systematic nature of this practice.

At year's end, hundreds of people were still in incommunicado detention.

Enforced disappearances

The whereabouts of many people forcibly disappeared following the 2024 elections or individuals detained in 2025 remained unknown. According to Foro Penal, at least 63 people were still disappeared at the end of the year.

Enforced disappearances generally began with arbitrary detention by state agents, followed by lack of information, refusal to acknowledge the detention, and deliberate concealment of the fate and whereabouts of the detained person. In most cases, days or even months passed before the detention was communicated, and even then the only certainty that relatives had was that the person was in state custody. There were cases of people being subjected to enforced disappearance as they were transferred from one detention centre to another.

Enforced disappearances directly, though not exclusively, resulted in a systematic denial of judicial guarantees through simulated proceedings, such as initial hearings (which must take place within 48 hours of detention) being held behind closed doors and de facto suspension of habeas corpus, among other practices.

Impunity

Near total impunity for human rights violations persisted and little progress was made in the Venezuela I investigation at the ICC.

In August, the ICC Appeals Chamber ordered prosecutor Karim Khan to step down from the Venezuela investigation. This followed a request for recusal filed a year earlier by an organization alleging a possible conflict of interest due to family ties between the prosecutor and a lawyer from the legal team representing the Venezuelan state at the ICC. Deputy Prosecutor Mame Mandiaye Niang took over the investigation.

In December, the National Assembly voted to repeal Venezuela's ratification of the Rome Statute and withdraw from the ICC.

Freedom of expression and association

As of October, the NGO Espacio Público had recorded 217 attacks on freedom of expression. The National Union of Press Workers reported the detention of at least 23 press sector workers, some of whom had initially suffered enforced disappearance. The whereabouts of journalist Carlos Marcano were unknown for 13 days following his detention. In December, journalist and political analyst Nicmer Evans was disappeared for three days after the Bolivarian National Intelligence Service took him for an “interview” at the El Helicoide centre. At year’s end, he remained arbitrarily detained.

The VEsinFiltro project implemented by the organization Conexión Segura y Libre documented the censorship of independent media and their internet domains, allegedly under the orders of the National Telecommunications Commission.

In February and May respectively, the deadlines expired for the accreditation and registration in the NGO registry, in accordance with the Law on the Oversight, Regulation, Operation, and Financing of Non-Governmental Organizations and Nonprofit Social Organizations. This law restricted civic space. At the end of the year, it was unclear how many organizations had been registered under this law.

In October, authorities encouraged citizens to use VenApp to report potential dissidents. The app, initially developed for receiving social benefits and reporting deficiencies in public services, became a tool for political persecution.

The Venezuelan Observatory of Social Conflict recorded 2,219 protests during the year, of which 1,129 related to labour rights and the right to decent housing.

Human rights defenders

Arbitrary detention and judicial persecution of human rights defenders continued, as did the use of incommunicado detention and restrictions on due process as a form of reprisal. Javier Tarazona, Rocío San Miguel, Carlos Julio Rojas and Kennedy Tejeda remained arbitrarily deprived of their liberty at the end of the year. Carlos Julio Rojas was held incommunicado for almost four months, without access to family visits or contact with the outside world.

On 7 January, the director of the NGO Espacio Público and prominent human rights defender Carlos Correa was detained and subjected to enforced disappearance, generating concern among national and international organizations. He was released eight days later.

Eduardo Torres, defender and member of the NGO PROVEA, was arbitrarily detained in May. He was forcibly disappeared for five days and subsequently held incommunicado and without access to a trusted lawyer, among other violations of due process. In October, he was allowed to make a call to say he would be transferred from El Helicoide to Yare II prison.

Similarly, Martha Lía Grajales, a defender with the Surgentes collective, was detained in August after accompanying a group of mothers of people imprisoned for political reasons in a peaceful protest. Her whereabouts were also unknown until she was released from prison six days later, under measures alternative to imprisonment.

Human rights defender Pedro Hernández, coordinator of the NGO Campo, was detained in September. Several of his relatives were also arbitrarily detained while searching for him and released three days later. Pedro Hernández was released from prison in October.

The Centre for Defenders and Justice recorded 455 attacks and incidents against human rights defenders, including continued restrictions on the defence of human rights, intimidation and criminalization of humanitarian and social work.

Several organizations warned of a climate of intimidation and threats created by the Law on the Supervision, Regularization, Performance and Financing of Non-Governmental and Related Organizations, which undermined freedom of association and the legitimate work of NGOs in the country. The arbitrary detention of activists and journalists continued throughout the year, forcing human rights organizations and defenders to work in exile and seek international protection.

Refugees' and migrants' rights

UNHCR, the UN refugee agency, reported that approximately 7.9 million people had left the country since 2015, seeking international protection.

In July, 252 Venezuelan men were returned to Venezuela from El Salvador. All of them had been forcibly disappeared for more than three months at the Terrorism Confinement Center (CECOT) in that country, to which they had been transferred from the USA.

During the year, hundreds of people seeking international protection in the USA were illegally expelled and returned to Venezuela, where they were at risk of their government's policy of persecution.

Economic, social and cultural rights

According to the Centre for Documentation and Social Analysis of the Venezuelan Federation of Teachers, the International Monetary Fund estimated that inflation would reach 269.9% by the end of the year. The cost of the basic food basket for a family of five was USD 503.73 in April, equivalent to VES 45,335.73, while the monthly minimum wage remained frozen since 2022 at VES 130. At the end of 2025, this amounted to less than one US dollar at the official exchange rate, highlighting how people's purchasing power has continued to erode.

Humanitarian aid continued and reached 1.9 million people as of November, according to OCHA.

There was no progress on sexual and reproductive rights, including access to abortion and family planning methods. The state did not develop or implement public policies aimed to prevent the violation of these rights or to ensure their effective enjoyment. In addition, the absence of official data made it difficult to develop and evaluate evidence-based policies. Abortion remained criminalized in most cases.

LGBTI people's rights

Lack of progress on LGBTI rights persisted. OHCHR, the UN human rights office, reported that transgender persons were being held in detention centres according to their sex assigned at birth, further exposing them to protection risks while in custody. It also denounced the use by state authorities of sexist and anti-LGBTI rhetoric on public media to discredit members and supporters of the opposition. LGBTI people's rights organizations continued to demand approval on second reading of the Organic Law on Gender Equity and Equality, introduced in 2009.

Indigenous Peoples' rights

Lack of guarantees and respect for Indigenous Peoples' rights continued to be a matter of concern.

In January, some Yekuana Indigenous communities in the state of Amazonas reported that a conflict had arisen due to illegal mining activity in their territory.

According to information published in October on digital media channels, a group of 14 Indigenous Sanemá had tested positive for tuberculosis. This raised concern among civil society organizations about the lack of data on morbidity and mortality rates within Indigenous territories.

Right to a healthy environment

The authorities announced that, in a meeting with the executive secretary of the UN Framework Convention on Climate Change, they had expressed Venezuela's commitment to environmental justice, climate change mitigation and adaptation projects, and the fight against the climate crisis.

The media continued to warn of the impacts of illegal mining and environmental devastation. A report on illegal mining and human rights published by several NGOs pointed to the lack of reliable data and the absence of monitoring systems as barriers to climate management, despite official statements on this.

The NGO SOS Orinoco documented 10 mining accidents in the first quarter of the year, with a total of 10 deaths. In October, the media reported the death of 14 miners in Bolívar state after a flood in the gold mine where they were working. There were questions as to whether the mine had all necessary legal permits; the authorities provided no information on the issue.

Exhibit B

**Human Rights Watch, World Report 2026 –
Venezuela**



LANGUAGES

DONATE NOW

Venezuela

Events of 2025

Relatives of political prisoners hold signs as they take part in a group prayer during Holy Week in Altamira Square in Caracas on April 14,

2025.

© 2025 Federico PARRA/AFP via Getty Images

AVAILABLE IN



After polls closed on July 28, 2024, Venezuela's Electoral Council declared that Nicolás Maduro had been re-elected as president despite substantial evidence to the contrary. International observers denounced lack of transparency in announcing the results and questioned them.

Venezuelan authorities carried out brutal repression against those who protested the results and stepped-up arbitrary arrests, enforced disappearances, and other violations of the rights of political opponents, critics, and foreign nationals.

A significant portion of the country's population experiences multidimensional poverty, having inadequate access to rights-essential goods and services, including food and medicines. The harsh economic conditions and government persecution have forced 8 million to flee since 2014.



After the July 28, 2024 presidential elections, authorities and pro-government armed groups, known as *colectivos*, carried out widespread abuses. As thousands protested Maduro's claimed re-election, mainly in low-income neighborhoods, the government launched "Operation Knock Knock" (Operación 'Tun 'Tun), a nationwide campaign of intimidation and repression. Twenty-four protesters and bystanders died, in many cases at the hands of Venezuelan security forces and *colectivos*.

Thousands of critics, including children, political opponents, and foreign nationals, have been arbitrarily detained and charged in virtual hearings with vague offenses such as "incitement to hatred" and "terrorism."

Venezuelan authorities have frequently denied carrying out arrests or hidden detainees' whereabouts, in what amount to enforced disappearances under international law. Families have been left searching for their loved ones for days or weeks.

Many detainees have been held incommunicado, some since the day of their arrest, denied visits, phone calls, and access to private legal counsel or their case files.

Some detainees have been subjected to ill-treatment and torture, including beatings, electric shocks, asphyxiation with plastic bags, sexual torture, solitary confinement, and detention in tiny, dark, overcrowded punishment cells. According to the Independent International Fact-Finding Mission on the Bolivarian Republic of Venezuela (IFFM), women in detention have been subjected to sexual and gender-based violence including coercive transactional sex, reproductive violence, forced nudity, and "possible acts of sexual slavery and/or forced prostitution."

The Attorney General's Office released hundreds of detainees, though many remain under criminal investigation. Many have been forced to sign documents prohibiting them from disclosing information about their arrest or legal proceedings, and some have been compelled to record videos stating that their rights were respected during detention.

In July 2025, Venezuelan authorities announced the release of 80 nationals and 10 US citizens and residents in exchange for the release and repatriation of 252 Venezuelan migrants held incommunicado in El Salvador's notorious Center for Terrorism Confinement (Centro de Confinamiento del Terrorismo, CECOT) prison. The Venezuelans had been removed from the United States to El Salvador and detained at CECOT pursuant to an agreement between the two countries. In August, 13 political prisoners, including Maracay city officials, were also freed.



reported 884 political prisoners remained behind bars, including 85 foreigners.

The FFM's September report reiterated its conclusion that "acts of extreme cruelty" committed before and after the 2024 presidential election in Venezuela, including arbitrary detentions, torture, and sexual violence, amount to crimes against humanity.

Human Rights Defenders

Attacks on human rights defenders continued throughout 2025. The Center for Defenders and Justice (CDJ) reported over 321 registered in the first half of 2025 alone, including cases of intimidation, harassment, and arbitrary arrests.

On January 7, hooded men forced Carlos Correa, the head of the leading free speech NGO Espacio Público and member of the Americas Advisory Committee at Human Rights Watch, into an unidentified vehicle and arrested him. Correa was released days later after strong international pressure.

According to Venezuelan Program for Education and Action on Human Rights (Programa Venezolano de Educación Acción en Derechos Humanos, PROVEA), as of September 5, five human rights defenders were behind bars: Javier Tarazona, the head of the organization Fundaredes, detained in July 2021; Rocío San Miguel, a renowned security expert and human rights defender, detained in February 2024; Carlos Julio Rojas, a journalist and social activist, detained in April 2024; Kennedy Tejeda, a lawyer with Foro Penal, detained in August, 2024; and Eduardo Torres, a member of PROVEA, detained on May 9, 2025.

Between August and November 2024, the National Assembly, controlled by Maduro's party, passed legislation that severely restricts the work of civil society groups and penalizes people who advocate for sanctions, whether targeted or broad, with penalties of up to 30 years in prison.

US funding cuts under President Donald Trump forced some human rights organizations to restrict or stop their work. The US administration's justifications for cutting foreign aid echoed Venezuelan government narratives that delegitimize international efforts to promote and advance human rights.

Freedom of Expression

[DONATE NOW](#)

Between January and August, Espacio Público documented what it said were 167 violations of freedom of expression, including censorship, intimidation, and administrative restrictions. The National Telecommunications Commission (Comisión Nacional de Telecomunicaciones, CONATEL) reportedly ordered the closure of four radio stations, and 21 websites were blocked, mainly by the national telephone company CANTV, though private companies allegedly also enforced some restrictions.

Authorities used online platforms to intimidate, stigmatize, and surveil presumed critics, facilitating arrests. They published people's personal data to threaten them.

At least 15 journalists remained behind bars as of August 5, according to the Press and Society Institute of Venezuela (Instituto Prensa y Sociedad de Venezuela, IPYS Venezuela).

US cuts to foreign aid undermined the work of independent media outlets; some are struggling to survive.

Impunity

The judiciary stopped functioning as an independent branch of government in 2004, when then-President Chávez passed a raft of legislative changes and packed the Supreme Court with his supporters. The court has since supported the executive branch in repression of critics.

The Office of the UN High Commissioner for Human Rights (OHCHR) reported government "delays" in investigating and prosecuting killings, including protest-related deaths occurring in 2014, 2017, and 2019, and killings by security forces. The Attorney General's Office and the Ombudsperson's Office have been complicit in grave human rights violations.

In November 2024, OHCHR was allowed to resume limited activities in Venezuela; authorities had suspended its operations in February of that year. By 2025, only one international staff member had been allowed to return, and the office had very little access in the country. On July 1, 2025, following a report on Venezuela by the OHCHR high commissioner, the National Assembly declared the high commissioner persona non grata.

The International Criminal Court prosecutor's office continued its investigation of alleged crimes against humanity in Venezuela.



for crimes against humanity. His challenge was rejected on appeal in March, and the case remains under investigation. The Argentinian court has also issued arrest warrants against other Venezuelan government officials and members of the security forces, including Nicolás Maduro and Diosdado Cabello.

Humanitarian Emergency

A significant portion of the country's population experiences multidimensional poverty, with inadequate access to rights-essential goods and services including food and medicines. According to HumVenezuela, an independent platform of civil society organizations, by November 2023, the most recent date for which data was available, 14.2 million people faced severe humanitarian needs.

Since March 2022, the legal minimum wage has been 130 bolivars (approximately US\$1) per month.

Almost 18 percent of Venezuelans face undernourishment due to insufficient food consumption, according to the UN Food and Agriculture Organization. According to HumVenezuela, food insecurity has forced some families to reduce their daily calorie intake, scavenge for food in refuse, and seek additional sources of income, including an increase in informal jobs and jobs under exploitative conditions.

Public healthcare facilities continue to lack essential medicines and medical equipment. According to the independent National Hospital Survey, conducted by doctors nationwide, shortages of emergency medical supplies in 2024 reached 36 percent. Many people have turned to self-medication and personal support networks to obtain treatment given their limited access to medicines and doctors. Access to contraceptives is very limited for women and men living in poverty.

Limited availability and accessibility of potable water, electricity, domestic gas, and fuel continue to harm people's enjoyment of rights. Many households must collect rainwater for daily use and rely on wood-burning stoves for cooking.

In June 2025, OHCHR reported that access to food, health care, and other rights-essential goods and services had been affected by the suspension of humanitarian funding from some foreign donors, as well as by overcompliance with US sectorial sanctions.

Refugees, Asylum Seekers, and Migrants



percent of Venezuelans surveyed expressed their intention to emigrate.

A mix of factors cause Venezuelans to leave, including harsh economic conditions and persecution. Many people have left the country since the post-electoral crackdown seeking protection abroad, including elected officials, members of the opposition, people who worked at polling stations or were pivotal to secure the electoral tally sheets, and former security force members. They face inefficient asylum systems in Latin America and abusive migration policies in the US.

In the first half of 2025, the Trump administration ended resettlement and parole programs benefiting tens of thousands of Venezuelans, and canceled their CBP One and Safe Mobility Offices appointments. In October, the Supreme Court rejected a challenge to the administration's termination of Temporary Protected Status (TPS) for Venezuelans. The administration had cited alleged improvements in the human rights situation in Venezuela as justification for termination.

The Trump administration reinstated deportation flights to Venezuela, with 6,835 people returned between February and July. The US also removed eight Venezuelan women to El Salvador, only to later return them to the US, and transferred 252 men to El Salvador's maximum-security prison CECOT, where they suffered arbitrary detention, enforced disappearances, and systematic torture. El Salvador later sent the men back to Venezuela. The US government accused them, without providing evidence, of being members of 'Tren de Aragua, an organized crime group that the US government has designated as a foreign terrorist organization.

The Trump administration also removed Venezuelan nationals to US facilities at Guantanamo Bay, where they were held incommunicado and in isolation.

Women's and Girls' Rights

Venezuela continues to have one of the highest maternal mortality rates in the region. Abortion is criminalized except when the life of the pregnant person is at risk. Safe abortion and post-abortion care is limited.

Access to sexual and reproductive health services for women and girls, including maternal care, family planning, and access to contraception, remains inadequate and unaffordable to many.

[DONATE NOW](#)

Indigenous People's Rights

Indigenous peoples continue to “lack resources and access to adequate food,” according to a UN expert on the right to food, and face disproportionate malnutrition and extreme poverty. The OHCHR received reports on maternal morbidity and deaths among the Ye'kwana and Sanemá, as well as too few healthcare centers and shortages of medicines and equipment.

Indigenous people face major challenges in the demarcation of their territories, leaving them vulnerable to dispossession by cattle ranches, illegal gold mining, and plantation agriculture, which are significant drivers of deforestation in the Venezuelan Amazon. These conditions also facilitate the presence of armed or criminal groups and contribute to the forced displacement of many Indigenous communities.

Armed and Criminal Groups

Armed groups operate mainly in border states, and brutally enforce rules that govern people's daily life. “Colectivos” and other criminal and armed groups reportedly intimidate people in border and mining areas.

The US designated Venezuelan criminal groups Tren de Aragua and Cartel de los Soles as foreign terrorist organizations, a move followed by other countries in the region.

International Actors

In June, OHCHR highlighted Venezuela's worsening human rights situation, including enforced disappearances, which UN experts also addressed. The Inter-American Commission on Human Rights concluded that Venezuela's post-election abuses were aimed to “instill fear” and “suppress social protest” to “consolidate power” following allegations of electoral fraud.

In January, the European Council renewed and expanded its list of sanctions on Venezuelan individuals, including members of the electoral authority, judiciary, and security forces, bringing the total number subject to asset freezes and travel bans to 69. In March, in a statement at the UN Human Rights Council, the European Union condemned the Venezuelan government's “acts of repression against dissenting voices” and urged authorities to uphold their consular obligations to detained foreign nationals.

[DONATE NOW](#)

detainees, while Maduro agreed to assist the US government with deportations. In its first weeks in office, the administration made deep cuts to foreign assistance and USAID programs that directly impacted Venezuelans and groups working to combat rights violations. In March, Trump revoked Chevron's license to operate in Venezuela.

At time of writing, the US military was conducting strikes against speed boats in international waters coming from Venezuela that it alleged were carrying drug traffickers, in what amounts to extrajudicial killings. In October, the Trump administration authorized the CIA to conduct covert action in the country.

[Browse Countries](#)[Choose](#)

Protecting Rights, Saving Lives

Human Rights Watch defends the rights of people in close to 100 countries worldwide, spotlighting abuses and bringing perpetrators to justice

[DONATE NOW](#)



[DONATE NOW](#)



Get Updates On Rights Issues Worldwide

Enter an email address

[Sign Up](#)

Connect With Us

[Contact Us](#) | [Corrections](#) | [Privacy Policy](#) | [Permissions](#) | [Site Map](#) | [Child Safeguarding](#) | [Text Version](#)

© 2026 Human Rights Watch

Human Rights Watch | 350 Fifth Avenue, 34th Floor | New York, NY 10118-3299 USA | t 1.212.290.4700

Human Rights Watch is a 501(C)(3) nonprofit registered in the US under EIN: 13-2875808

EXHIBIT C

Devastating earthquakes hit Venezuela

Emergency

Devastating earthquakes hit Venezuela

UNICEF rushes support for emergency response efforts to reach children with life-saving care



© UNICEF/UN0876280/QUINTERO/AFP

[English](#) [Español](#)

Two major earthquakes that rocked Venezuela on 24 June 2026 have left thousands of children in need of safe shelter, clean water and urgent care. In the weeks after a disas

strikes, children are among the most vulnerable – at risk of acute distress and injury as the essential services they depend on buckle under strain.

UNICEF has scaled up our emergency response, working alongside the Government of Venezuela and other humanitarian partners to reach children and their families with healthcare and nutrition support, water and sanitation, and psychosocial and protection services.

Donate to support UNICEF's response in Venezuela

[Give now](#)

What happened in Venezuela?

The 7.5- and 7.2-magnitude earthquakes shook Venezuela in what's been described as the country's most significant seismic event in over a century. Thousands of people have been killed or injured, with many more still unaccounted for.

The hardest-hit communities reside in Caracas and the states of Aragua, Carabobo, Falcón, La Guaira, Miranda and nearby areas. Homes, hospitals and schools lie in rubble. Infrastructure for water and electricity has been destroyed. Telecommunication networks are down, and transportation hubs closed, complicating response and assessment efforts.

Why are children especially vulnerable?

Children need urgent and specialized care after an earthquake strikes. In the hours and days that follow, children risk being separated from their families or displaced from their homes – cut off from critical protection and care. Many among the dead and wounded are parents or caregivers.

Children are also vulnerable to serious injury, less aware than adults of the environmental dangers and hazards an earthquake can trigger – like falling objects, broken glass or potential fires.

Acute distress affects children differently. While many may seem okay in the month or so ahead, symptoms of trauma can appear after the numbness wears off. This makes psychosocial support a critical part of emergency response efforts.

What do children need now?

Most urgently, children need medical care (including psychosocial support), safe drinking water and shelter. They need protection services, like family tracing and reunification for those who have been separated from loved ones. And they need temporary learning spaces to come together with friends and regain a sense of safety and normalcy.

How Catalina is helping children recover after Venezuela's ear



Mirar en

© UNICEF

What's UNICEF doing to help?

UNICEF teams are on the ground, supporting national efforts alongside humanitarian partners, to deliver critical care to children and their families.

In the days immediately following the earthquakes, UNICEF dispatched supplies from its regional warehouse in Panama and global supply hub in Copenhagen, including emergency health kits, water purification and storage supplies, wheelchairs, tents for child-friendly spaces, and recreational materials.

So far, UNICEF support includes:

- **Delivering water, sanitation and hygiene (WASH) supplies**, including tens of thousands of litres of safe water and family hygiene kits.
- **Supporting mobile health teams** providing primary health consultations, including vaccinations.
- **Establishing child-friendly spaces**, reaching hundreds of children and adolescent psychosocial support and recreational activities, and providing parents and caregivers.

with mental health support.

- **Activating child protection teams** to provide identification and referral services.
- **Establishing breastfeeding stations** in temporary camps to provide counselling and assistance to mothers.

UNICEF estimates that US\$52 million is required to respond to the earthquake, as part of our wider 2026 [Humanitarian Action for Children appeal](#) for Venezuela, which stands at US\$137.6 million. We're asking our partners, donors and international community to act swiftly through [flexible funding](#) that helps us reach the most vulnerable children, at their most vulnerable moment.

Read the latest



Press release 30 June 2026

UNICEF aid shipment lands in Venezuela following devastating earthquakes

Read now

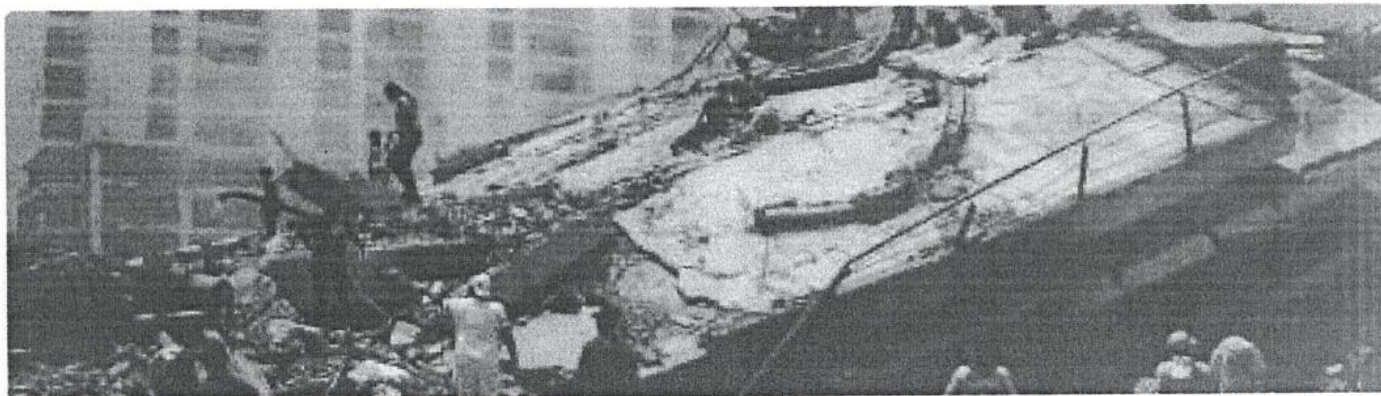


Blog post

A space to be a child again

Jeremías and his family were forced to leave their home behind after the two earthquakes that struck La Guaira

[Go to UNICEF Latin America and Caribbean](#)



Resource

Bolivarian Republic of Venezuela Situation Reports

The situation for children in Venezuela now, and what UNICEF is doing to help

[Learn more](#)[Page](#)

UNICEF in Venezuela

What we do, and how we do it, for children across Venezuela

[Go to UNICEF Venezuela](#)

On the ground before, during and after an emergency

UNICEF is on the ground before the news breaks, ready to deploy with life-saving assistance in more than 190 countries and territories. We work with governments and other partners to mobilize rapidly and efficiently when disaster strikes.

[Donate any amount](#)[UNICEF home](#)[What we do](#)[Research and reports](#)[Stories and features](#)

Where we work

Press centre

Take action

About us

Work with us

Partner with UNICEF

UNICEF Executive Board

Evaluation

Ethics

Internal Audit and Investigations

Transparency and accountability

Safeguarding

Sustainable Development Goals

Frequently asked questions (FAQ)

Related UNICEF sites

UNICEF Data

UNICEF Parenting

U-Report, for youth

Global Shared Services Centre

UNICEF Digital Impact

Support UNICEF

ЮНИСЕФ на Русском

Become a donor



Contact us

Legal

Report fraud, abuse, wrongdoing

Accessibility

Cookie settings

UNICEF strives to uphold the rights of every child, protecting them from harm and all forms of discrimination, so that they can grow up healthy and educated to reach their full potential. This wor.



Exhibit D

**Human Rights Watch Report, Exclusions, Procedures
Mar Amnesty Law (2026)**



Search [hrw.org](https://www.hrw.org)



[English](#)

[DONATE NOW](#)



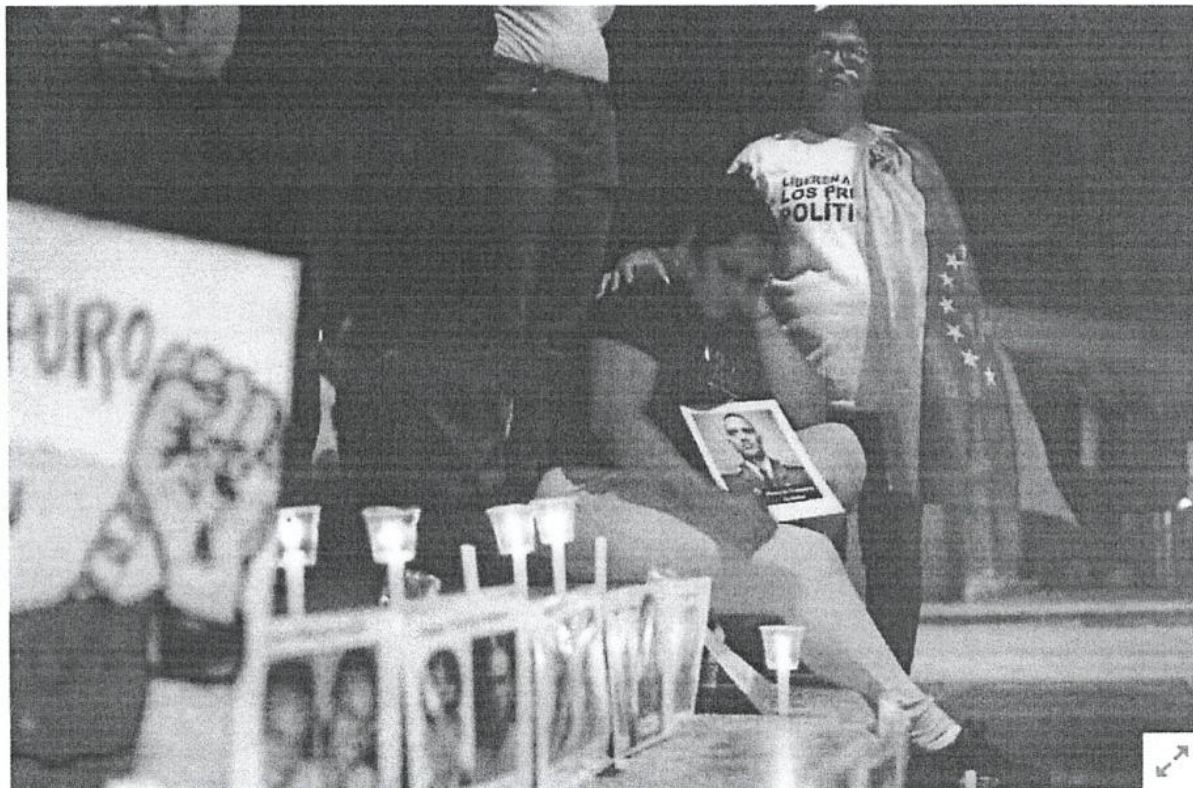
[Trending](#) [World Cup 2026](#) [Trump Administration and Human Rights](#) [Crisis in the Middle East](#) [Sugar](#)

May 13, 2026 12:01AM EDT | Report

Available In [English](#) [Español](#)

Venezuela: Exclusions, Procedures Mar Amnesty Law

Ensure Due Process; Explore Other Release Options; Reform Justice System



Relatives of detainees held for political reasons wait outside El Helicóide, headquarters of Venezuela's intelligence service and a detention center, after the National Assembly approved an amnesty bill in Caracas, Venezuela, February 19, 2026. © 2026 AP Photo/Cristian Hernandez

(Washington, DC) – Venezuela's new amnesty law has serious shortcomings that exclude many people who have been arbitrarily detained and is being applied in ways that may deny release to people who should be eligible, Human Rights Watch said today.

The law is ostensibly an effort to help Venezuela move forward from years of political repression under former President Nicolás Maduro. Venezuelan authorities say that more than 8,600 people,

[English](#)[DONATE NOW](#)

bars, according to the human rights group Foro Penal

“Venezuela’s new amnesty law falls notably short of ensuring the release of anyone arbitrarily detained for political reasons,” said Juanita Goebertus Estrada, Americas director at Human Rights Watch. “What’s worse, its unfair and opaque implementation has further undermined whatever limited promise it held.”

Venezuela’s National Assembly approved the amnesty law on February 19, 2026, with the stated purpose of “promoting social peace and democratic coexistence” by granting a “full and general amnesty” for certain offenses committed between 1999 and 2026. Venezuelan authorities should ensure that the law is applied transparently and to its fullest extent, and should explore additional legal avenues to drop criminal charges against everyone who has faced arbitrary prosecution, Human Rights Watch said.

Under the law, Venezuelan courts, which lack independence from the executive branch, are responsible for reviewing individual amnesty requests.

Human Rights Watch interviewed 16 people whom Justicia, Encuentro y Perdón and Foro Penal have identified as political prisoners, and whose amnesty requests were denied or pending at the time of the interviews. Researchers also interviewed two lawyers representing potential beneficiaries as well as members of several Venezuelan human rights organizations monitoring its implementation. Human Rights Watch additionally reviewed ten court decisions denying amnesty requests and three appeals.

President Delcy Rodríguez suggested on April 23 that the amnesty law had fulfilled its purpose and was coming to an end. Congressman Jorge Arreaza, who leads a National Assembly commission tasked with monitoring compliance with the law, later clarified that it remained in place. Yet he estimated that the law had already covered most eligible cases. The two lawyers interviewed, as well as Foro Penal, said that some courts had apparently refused to accept new amnesty petitions since Rodríguez’s announcement.

Authorities have denied amnesty to opposition leaders such as Perkins Rocha and Henry Alviarez, members of the opposition party Vente Venezuela; human rights defender Javier Tarazona, director of the human rights organization Fundaredes; a group of union leaders; and journalist and activist Carlos Julio Rojas.

The law contains limitations that seriously undermine its stated purpose. Although the law claims to cover acts committed since 1999, it limits eligibility to those prosecuted “in the context” of specific events occurring in certain years. It also includes vaguely defined provisions that allow

[English](#)[DONATE NOW](#)

Even beyond its inherent limitations, the law's implementation has been marked by significant shortcomings. Some people seeking amnesty, including some who have been imprisoned for years, have not been adequately informed about the accusations or evidence presented against them, making it harder for them to argue that they meet the already narrow eligibility criteria in the law.

In some cases, judges have also failed to explain the legal basis for their decisions to deny amnesty. They have also restricted access to case files and to private legal representation.

Venezuelan authorities should ensure the unconditional release of anyone arbitrarily detained or prosecuted, including for political reasons, Human Rights Watch said.

The new Peace and Democratic Coexistence Program created by President Rodríguez should assess cases in which amnesty has been denied or remains pending, and it should urgently call on the government to proceed without delay in granting people pardons if they were arbitrarily or otherwise wrongfully detained and to release them unconditionally. The program should also review the cases of people who were excluded from the law because they have been accused of violent crimes without basis.

The newly appointed ombudsperson, Eglée González, should closely monitor the law's implementation and press the authorities to apply it in a transparent, even-handed way that respects due process. The newly appointed attorney general, Larry Devoe, should support amnesty requests by people arbitrarily detained and explore additional legal avenues under Venezuelan law to close arbitrary investigations against critics.

Venezuelan authorities should also take broader steps to restore the independence and integrity of the judiciary, including by ensuring transparent, merit-based appointments to vacant seats in the Supreme Court, Human Rights Watch said. They should also reform or repeal laws that have enabled the arbitrary prosecution of critics, such as the 2017 Law Against Hatred and the 2012 Law Against Organized Crime and Terrorism Financing.

"Foreign governments should monitor the release of political prisoners and the broader efforts to reform the judiciary as key benchmarks to assess whether there is progress in respecting human rights in Venezuela," Goebertus said.

Loopholes, Other Problems in the Law

The amnesty law claims to cover "all actions or omissions constituting crimes or misdemeanors" committed since 1999. However, it includes three sets of provisions that exclude many people who have been arbitrarily detained.



English

DONATE NOW

In some cases, judges have denied amnesty to people who had been arbitrarily detained on the apparent basis that their cases did not fall within the specific events covered by the law, although some decisions fail to articulate a clear basis for denying amnesty.

For example, on March 5, 2026, a judge in Caracas denied amnesty to five union workers who had been detained in 2022 after participating in protests demanding wage increases and better working conditions for the public sector. Among other reasons, the judge cited the fact that their detention was not connected to the specific events covered by the law. In 2023, they were convicted of “conspiracy” and “criminal association.” They were released in December 2023 under the condition of reporting periodically to the courts. The conviction still stands.

Second, the law contains broadly defined provisions allowing judges to exclude people who may have been arbitrarily detained for acts that amount to protected speech. In particular, the law excludes anyone accused of “promoting, instigating, facilitating, financing, or participating in armed or forceful actions against the people, sovereignty, and territorial integrity of Venezuela.”

Third, the law excludes people accused of “military rebellion,” certain violent crimes such as homicide, and human rights violations. Some of these exclusions are reasonable in principle and, to some extent, even required under international human rights law. However, some people in Venezuela have been arbitrarily prosecuted and convicted of such offenses and should be released unconditionally. Venezuelan authorities should explore additional avenues to ensure that such cases are properly reviewed, that those affected are released, and that the cases against them are dropped, based on a broader analysis of the evidence that does not rely solely on the crimes with which they were charged or convicted.

Among others, authorities should analyze the cases of over 180 members of the military whom Foro Penal considers to be political prisoners, along with those involving allegations of attempted murder against Nicolás Maduro.

In one case, Carlos Julio Rojas, a journalist and activist, was detained in April 2024 and accused, among other crimes, of trying to kill Maduro, accusations that he said were fabricated. He was released in January 2026 under conditions requiring him to report periodically to a judge. He told Human Rights Watch he was detained because of his criticism of Maduro’s government and his work as a journalist and human rights defender. In April, a judge denied his request for amnesty.

The law also requires beneficiaries to “cease” their allegedly criminal conduct, although many have been prosecuted for legitimate and lawful exercises of their rights to freedom of expression and association. This underscores the urgent need to reform or repeal laws, such as the 2017 Law Against Hatred, that have enabled such prosecutions in the first place.

[English](#)[DONATE NOW](#)

future accountability or truth-seeking efforts. Authorities should expunge the records from individuals' personal files while ensuring that they are otherwise preserved, Human Rights Watch said.

Failures in Implementation

Human Rights Watch identified shortcomings that have undermined the ability of people to argue that they meet the criteria established under the law.

Courts have also often exceeded the 15-day legal deadline for issuing decisions on amnesty requests. Human Rights Watch spoke with several people who had waited for more than two months for a decision in their cases or were still waiting. Lawyers and some applicants said that court officials have justified these delays because of a lack of "instructions from above," pointing to possible political or other undue interference.

Many people interviewed said they were not adequately informed of the accusations or evidence against them, making it difficult if not impossible for them to argue that their cases meet the requirements of the amnesty law. In some cases, the authorities have limited access to case files, which lawyers need to prepare adequate amnesty requests and effectively represent their clients.

For years, courts have also refused to accept documents where the accused critics, political opponents, and others designate a private counsel, effectively forcing defendants to be represented by a public defender. Several people who requested amnesty said that courts continue this practice, which makes it more difficult for individuals to prepare and submit requests.

"I tried to appoint my lawyer," an opposition figure said. "They put up many obstacles, telling me not to worry because the public defender could proceed with the request." However, four people whose amnesty requests were denied and two of their lawyers said that public defenders fail to request amnesty or appeal negative decisions. "We are in a total state of defenselessness," one of them said.

Courts have often failed to articulate a clear basis for their decisions to deny amnesty. Some rulings Human Rights Watch reviewed simply cite several articles in the law, without specifying which requirements had not been met in the judge's view.

This practice has enabled decisions that are, or appear to be, inconsistent. In one case documented by Human Rights Watch, a judge granted amnesty to six of eight defendants but denied it to the remaining two, including Perkins Rocha (the only one still under house arrest), although all of them had faced the same charges stemming from seemingly similar events and time periods included in the law. In another case, the judge told the detainee that his amnesty request was rejected because

[English](#)[DONATE NOW](#)

In at least 10 documented cases, judges failed or delayed providing written copies of decisions denying amnesty. “I asked them for a copy of the decision, but they won’t give it to me,” one person said. Without a formal written ruling, affected individuals are severely hampered in their ability to appeal.

Your tax deductible gift can help stop human rights violations and save lives around the world.

\$50**\$100****\$250****\$500****\$1000****Other**[DONATE NOW](#)**Region / Country** Americas, Venezuela**MORE READING**

February 18, 2026 | News Release

Venezuela: Dismantle Repressive Apparatus

January 12, 2026 | World Report Chapter

Venezuela

[English](#)[DONATE NOW](#)

“Casting Us Aside to Die”

Cuban and Other Third-Country Nationals Deported from the US to Mexico



November 12, 2025 | Report

“You Have Arrived in Hell”

Torture and Other Abuses Against Venezuelans in El Salvador's Mega Prison

MOST VIEWED

1 July 16, 2026 | News Release

Uganda: Military Seizing Government Critics



2 November 12, 2018 | News Release

Pakistan: Girls Deprived of Education



3 June 25, 2026 | Report

Dying in Detention



4 July 15, 2026 | Report

“You’re Only Getting Out Deported or Dead”



5 November 25, 2019 | Report

A Dirty Investment



Protecting Rights, Saving Lives

Human Rights Watch defends the rights of people in close to 100 countries worldwide, spotlighting abuses and bringing perpetrators to justice



[English](#)

[DONATE NOW](#)



Get Updates On Rights Issues Worldwide

Enter an email address

[Sign Up](#)

Connect With Us

[Contact Us](#) | [Corrections](#) | [Privacy Policy](#) | [Permissions](#) | [Site Map](#) | [Child Safeguarding](#) | [Text Version](#)

© 2026 Human Rights Watch

Human Rights Watch | 350 Fifth Avenue, 34th Floor | New York, NY 10118-3299 USA | t 1.212.290.4700

Human Rights Watch is a 501(C)(3) nonprofit registered in the US under EIN: 13-2875808

[Pro Se]

Martin Alexis Burgos Manchego

A-Number: 

East Montana Detention Center / ERO El Paso Camp East Montana
6920 Digital Rd.
El Paso, TX 79936

Date: 07/17/2026

Clerk of Court

United States District Court
Western District of Texas
El Paso Division
525 Magoffin Avenue
El Paso, TX 79901

Re: Petition for Writ of Habeas Corpus Under 28 U.S.C. § 2241

Petitioner: Martin Alexis Burgos Manchego

A-Number: 

Dear Clerk of Court:

Enclosed for filing, please find my **Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241**, challenging my continued immigration detention by U.S. Immigration and Customs Enforcement (ICE).

I respectfully request that the Court file and docket the enclosed pleadings and supporting documents for consideration.

The following documents are enclosed:

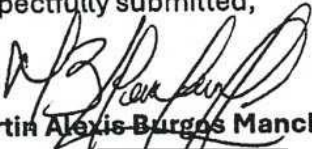
1. Petition for Writ of Habeas Corpus (AO-242).
2. Declaration of Martin Alexis Burgos Manchego.
3. Motion to Reopen filed before the Immigration Court.
4. Notice to Appear (Form I-862).
5. EXHIBITS
 - Exhibit A – Amnesty International, *Venezuela 2025 Human Rights Report*
 - Exhibit B – Human Rights Watch, *World Report 2026 – Venezuela*
 - Exhibit C – United Nations Independent International Fact-Finding Mission on Venezuela
 - Exhibit D – Human Rights Watch Report, *Exclusions, Procedures Mar Amnesty Law* (2026)

At this time, I **do not have access to copies of the Immigration Court (EOIR) or Board of Immigration Appeals (BIA) orders**, either in physical or digital format. Despite my repeated requests while in ICE custody, I have not been provided with copies of the Immigration Judge's final order or other immigration court records necessary to fully support my petition.

Accordingly, I respectfully request that the Court consider this Petition based on the evidence presently available and, if necessary, order Respondent to produce the complete administrative record, including any EOIR and BIA decisions relevant to my detention and removal proceedings.

Thank you for your attention to this matter.

Respectfully submitted,


Martin Alexis Burgos Manchego
A-Number: 
Petitioner, Pro Se

JUDGE LEON SCHINDLER

OMB# 1125-0003

U.S. Department of Justice
Executive Office for Immigration Review

Fee Waiver Request

NAME AND ALIEN ("A") NUMBER

Answer all items in English. (Type or Print)

If more than one respondent is included in your application, motion, or appeal, only the lead respondent need file this form.

MARTIN ALEXIS BURGOS MANCHEGO

Name (Last, First, Middle)

Alien ("A") Number

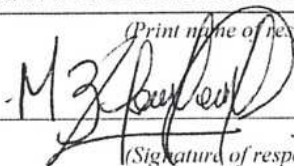
AFFIDAVIT IN SUPPORT OF FEE WAIVER REQUEST.

(This affidavit is to be signed by the respondent, not the respondent's attorney or representative of record.)

I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that I am the person above and that I am unable to pay the filing fee. I believe that my application/motion/appeal is valid and not frivolous, and I declare that the following information is true and correct to the best of my knowledge.

MARTIN ALEXIS BURGOS MANCHEGO

(Print name of respondent filing the form)



(Signature of respondent filing the form)

07/16/2026

(Date signed)

EP 26 CV 1955

The Immigration Judge may grant your fee waiver request for an EOIR application or motion filed with the Immigration Court if you show that you are unable to pay the filing fee. The Board of Immigration Appeals (BIA) may grant your fee waiver request for an appeal or motion filed with the BIA if you show that you are unable to pay the filing fee. If this fee waiver request does not establish your inability to pay the required fee, your application, motion, application, or appeal will not be deemed properly filed. 8 C.F.R. §§ 1003.8 and 1003.24(d). You must answer all questions on the form even if the answer is "\$0.00".

1. Estimate your average monthly amount of money received from each of the following sources. Adjust any amount that was received weekly, biweekly, quarterly, semiannually, or annually to show the average monthly rate. Use gross amounts, that is, amounts before any deductions for taxes and other state/federal payroll withholdings.

Income Sources	Monthly Average
Employment, including self-employment	\$ 0.00
Income from real property (such as rental income)	\$ 0.00
Interest from checking and/or saving account(s)	\$ 0.00
All other income, including but not limited to these and other sources: alimony, child support, interest, dividends, social security, annuities, unemployment, public assistance, etc.	\$ 0.00
1.A.: TOTAL AVERAGE MONTHLY INCOME	\$ 0.00

2. Estimate your average monthly expenses. Adjust any payments that are made weekly, biweekly, quarterly, semiannually, or annually to show the monthly rate.

Expense Sources	Monthly Average
Rent or home-mortgage payment(s) (include lot rented for mobile home)	\$ 0.00
Utilities (electricity, heating fuel, water, sewer, telephone, internet, etc.)	\$ 0.00
Installment payments or outstanding debits (credit card(s), store credit card(s), vehicle payment, personal loan(s), etc., but not including rent or home-mortgage payments)	\$ 0.00
Living expenses (food, clothing, transportation, child care, tuition, etc.)	\$ 0.00
All other expenses, including but not limited to these and other sources: alimony, child support, insurance, medical, health, any state or federal taxes, attorney fees, etc.	\$ 0.00
2.B: TOTAL AVERAGE MONTHLY EXPENSES	\$ 0.00

3. Calculate ability to pay filing fee (total income minus total expenses):

TOTAL AVERAGE MONTHLY INCOME (1.A):	\$ 0.00
TOTAL AVERAGE MONTHLY EXPENSES (2.B):	- \$ 0.00
TOTAL:	\$ 0.00

4. Provide any other information that will help explain why you cannot pay the filing fees for your appeal, motion, or application. Include your name and "A" number on all pages of any additional document(s) or additional pages.

I am currently detained by U.S. Immigration and Customs Enforcement (ICE) and do not have any income or financial resources. I am unable to work while detained, and I do not have access to funds to pay the required filing fee. Payment of this fee would impose a severe financial hardship.

Attorney or Representative (if any):

(If an attorney or representative is submitting this form, the attorney or representative must complete, sign, and date below.)

I hereby attest that I have reviewed the details provided herein and I am satisfied that this fee waiver request is made in good faith.

Signature of Attorney or Representative	Print Name	EOIR ID Number	Date
---	------------	----------------	------

Paperwork Reduction Act Notice: Under the Paperwork Reduction Act, a person is not required to respond to a collection of information unless it displays a valid OMB control number. We try to create forms and instructions that are accurate, can be easily understood, and which impose the least possible burden on you to provide us with information. The estimated average time to complete this form is one (1) hour. If you have comments regarding the accuracy of this estimate, or suggestions for making this form simpler, you can write to the Executive Office for Immigration Review, Office of the General Counsel, 5107 Leesburg Pike, Suite 2600, Falls Church, Virginia 22041.

Privacy Act Notice: The information on this form is requested to determine if you have established eligibility for the fee waiver you are seeking. The legal right to ask for this information is located at 8 C.F.R. § 1003.8(a)(3). EOIR may provide this information to other Government agencies. Failure to provide this information may result in denial of your request.

Departamento de Justicia de los Estados Unidos

Formulario para Cambio de Dirección/Información de Contacto

Oficina Ejecutiva de Revisión de Casos de Inmigración

Tribunal de Inmigración

Instrucciones: para completar este formulario, rellene todos los espacios en blanco, incluyendo la constancia de notificación que certifica que usted le ha enviado una copia al Departamento de Seguridad Nacional (DHS). Después de rellenar los espacios en blanco y de firmar la declaración y la constancia de notificación, usted deberá enviar el formulario por vía electrónica, por correo, o entregarlo en persona. Si lo envía por vía electrónica, use el portal para comparecientes, <https://respondentaccess.eoir.justice.gov>. Si lo envía un abogado o un representante plenamente acreditado, deberán enviarlo a través del portal de casos, <https://portal.eoir.justice.gov>. Si lo hace por correo, siga las instrucciones de la página dos. Usted deberá enviar una copia de este formulario por separado por cada individuo que esté en un proceso de inmigración (o sea, se deberá presentar un formulario por cada persona que tenga un caso pendiente ante el tribunal de Inmigración y se vea afectada por ese cambio de dirección o teléfono).

Usted deberá presentar este formulario ante el tribunal de inmigración dentro de los cinco días hábiles del cambio de dirección o teléfono o de haber recibido el documento acusatorio (Notificación de Comparecencia) con información incorrecta. El tribunal de inmigración enviará toda correspondencia oficial (por ej.: fecha, hora y lugar de las audiencias) a la dirección que usted facilite. El tribunal de inmigración solo hará cambios de dirección y número de teléfono en su expediente de EOIR al recibir este formulario; el tribunal no cambiará su dirección o número de teléfono en base a una dirección o número de teléfono que se encuentre en los escritos, pedimentos, u otras comunicaciones con el tribunal. Si usted no se presenta a alguna audiencia ante un juez de inmigración cuando se le ha entregado o se le ha enviado por correo una notificación de audiencia u otra correspondencia oficial a la dirección que usted facilite, el Departamento de Seguridad Nacional (DHS) podría arrestarlo. Además, el juez de inmigración podría llevar a cabo la audiencia en su ausencia y emitir una orden de expulsión, deportación o exclusión en su contra. Si el juez emite dicha orden, usted no reunirá los requisitos para ciertos beneficios inmigratorios que impidan su expulsión, de conformidad con la Ley de Nacionalidad e Inmigración, a saber:

- Si usted está en procesos de **expulsión**: usted quedará sujeto a una orden de expulsión por un período de 10 años a partir de la fecha de emisión de dicha orden. Además, no reunirá los requisitos para la salida voluntaria, la cancelación de la expulsión, la legalización de su situación inmigratoria o el cambio de estatus.
- Si usted en procesos de **deportación**: usted quedará sujeto a una orden de deportación por un período de 5 años a partir de la fecha de emisión de dicha orden. Además, no reunirá los requisitos para la salida voluntaria, la cancelación de la expulsión, la legalización de su situación inmigratoria o el cambio de estatus.
- Si usted está bajo un proceso de **exclusión**: se podría considerar que ha desistido de su solicitud para ser admitido a los EE.UU.

Nombre (Apellido, Nombre, Segundo Nombre): Name - Last, First, Middle, Suffix (if applicable): BURGOS MANCHEGO, MARTIN, ALEXIS		Número de Extranjero (Número A): A-Number: 
Mi dirección y teléfono anteriores eran: Former Address and telephone number:		Mi dirección y teléfono actuales son: New address and telephone number:
		
Número: Calle: Apartamento (si es pertinente) Number: Street: Apartment (if any)		Número: Calle: Apartamento (si es pertinente) Number: Street: Apartment (if any)
		
Ciudad, Estado, y Código Postal: País (si no es EE.UU.) City, State, and Zip Code; Country (if other than U.S.)		Ciudad, Estado, y Código Postal: País (si no es EE.UU.) City, State, and Zip Code; Country (if other than U.S.)
Número de teléfono (incluya el prefijo del país si no es en EE.UU.) Phone number (include country code if other than U.S.)		Número de teléfono (incluya el prefijo del país si no es en EE.UU.) Phone number (include country code if other than U.S.)
 @gmail.com Correo electrónico Email address		 @gmail.com Correo electrónico Email address

Yo, declaro bajo pena de perjurio, conforme al título 28 del Código de los EE.UU., artículo 1746, que soy la persona arriba mencionada asociada con el número de registro de extranjero arriba mencionado, y que la información contenida en este formulario es verdadera y correcta a mi leal saber y entender.

FIRME AQUI →

X MARTIN BURGOS

07/16/2026

Firma

Fecha

CONSTANCIA DE NOTIFICACIÓN

Yo, (nombre) MARTIN BURGOS

07/16/2026

a la Oficina del Asesor Jurídico Principal del DHS, Agencia de Inmigración y Control de Aduanas- ICE, ubicada en:

DHS/ICE Office of Chief Counsel - 2345 Grand Blvd., Suite 500, Kansas City, MO, 64108

(Indicar si será entregado por vía electrónica/correo electrónico, en persona, o por correo (Provea Número y Calle, Ciudad, Estado, Código Postal))

Al firmar, concuerdo en presentar una copia de este formulario de cambio de dirección a la Oficina del Asesor Jurídico Principal del DHS, Agencia de Inmigración y Control de Aduanas-ICE en el local que he seleccionado anteriormente. Entiendo que puedo presentarle una copia a DHS sea por vía electrónica usando el portal DHS eService (inscribirse en <https://eservice.registration.ice.gov>), por correo o en persona.

FIRME AQUI →

X MARTIN BURGOS

(firma)

Formulario EOIR-33/IC

Rev.: Feb. 2026

Veto.: 31 de julio de 2026

INSTRUCCIONES PARA PRESENTAR EL FORMULARIO

1. Presente una copia del formulario relleno a la oficina del Asesor Jurídico Principal del DHS-ICE (OPLA, por sus siglas en inglés) usando el método indicado en la CONSTANCIA DE NOTIFICACIÓN que figura arriba. Si presenta la copia electrónicamente, use el Portal eService DHS ICE, <https://service.dhs.gov>. Para entregar el formulario por correo o en persona, sírvase acceder a la siguiente página, <https://www.dhs.gov/contact-legat>, para más información sobre las direcciones de las oficinas del OPLA de DHS ICE. No cumplir con estos requisitos podría resultar en que el EOIR rechace dicho formulario.

Aviso sobre la Ley de Confidencialidad de Información

Con el fin de notificar al tribunal de inmigración de EOIR de cualquier cambio (s) de dirección o número de teléfono, el Título 8 del Código de Los EE.UU., artículo 1229 (a)(1)9F0(ii) y el Título 8 del Código de Regulaciones Federales, artículo 1003.15 (d)(2) requieren que se presente la información a través de este formulario. Es obligatorio presentar esa información. Si usted no presenta la información requerida, las notificaciones que usted reciba serán limitadas y ello podría resultar en consecuencias adversas como se ha mencionado anteriormente. EOIR podría compartir esta información con otros en conformidad con los usos rutinarios aprobados descriptos en el aviso EOIR-001 del sistema de registros de EOIR, Sistema de Registros y de Información de Gestión, y en el EOIR-003, Expedientes de Denuncias Disciplinarias.