

JUDGE DAVID BRIONES

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

ROBINSSON GIOVANNI CHÁVEZ CARBAJAL,
Petitioner (Detainee),

v.

MERRICK B. GARLAND, Attorney General of the United States;
ALEJANDRO MAYORKAS, Secretary, Department of Homeland Security;
TAE D. JOHNSON, Acting Director, ICE;
WARDEN, EL PASO PROCESSING CENTER,
Respondents.

EP 26CV0006

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

COMES NOW the Petitioner, ROBINSSON GIOVANNI CHÁVEZ CARBAJAL ("Petitioner" or "Detainee"),
by and through his Next Friend, DIANA CAROLINA ARAGÓN LEYVA, pursuant to 28 U.S.C. § 2241,
the Suspension Clause of the United States Constitution, the Fifth Amendment Due Process Clause,
and all other applicable laws, and respectfully petitions this Honorable Court for a Writ of Habeas Corpus.

I. JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. § 2241 because Petitioner is in federal custody.
2. Venue is proper in this District because Petitioner is detained at El Paso Processing Center within this jurisdiction.

II. PARTIES

3. Petitioner: ROBINSSON GIOVANNI CHÁVEZ CARBAJAL,  Peruvian national.
4. Next Friend: DIANA CAROLINA ARAGÓN LEYVA, Peruvian national, mother of Petitioner's

U.S. citizen child.

III. FACTUAL BACKGROUND

5. Petitioner entered the United States in 2021 and has resided continuously for nearly five years.
6. Petitioner has a pending asylum application and has complied with all immigration requirements.
7. On November 7, 2025, Petitioner intervened to protect his ex-partner from harassment.
8. Petitioner was attacked by multiple individuals and was later detained by local police.
9. On November 10, 2025, a judge ordered Petitioner released.
10. Immediately upon release, ICE arrested Petitioner without a judicial warrant.

IV. LEGAL ARGUMENTS

A. UNLAWFUL WARRANTLESS ARREST

ICE violated the Fourth Amendment by arresting Petitioner without a judicial warrant. See *Payton v. New York*, 445 U.S. 573 (1980).

B. PROLONGED AND ARBITRARY DETENTION

Petitioner's continued detention violates Due Process. See *Zadvydas v. Davis*, 533 U.S. 678 (2001).

C. DUE PROCESS VIOLATIONS

Petitioner was denied an individualized custody determination. See *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018).

V. HUMANITARIAN FACTORS

11. Petitioner is the father of a one-and-a-half-year-old U.S. citizen child.
12. The child is suffering emotional harm due to separation.
13. Petitioner is a respected member of his church community.
14. Petitioner has no criminal record.

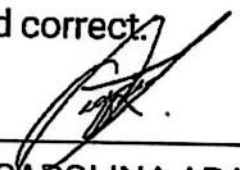
VI. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests:

- a. Immediate release from custody;
- b. Alternatively, a bond hearing;
- c. Any other relief deemed just and proper.

VII. VERIFICATION AND SIGNATURE

I, DIANA CAROLINA ARAGÓN LEYVA, declare under penalty of perjury that the foregoing is true and correct.



DIANA CAROLINA ARAGÓN LEYVA

Next Friend

Date: 12/30/2025

DECLARATION OF DIANA CAROLINA ARAGÓN LEYVA

I, DIANA CAROLINA ARAGÓN LEYVA, hereby declare under penalty of perjury under the laws of the United States of America that the following is true and correct to the best of my personal knowledge:

1. I am a Peruvian national, born on [REDACTED]. I reside at [REDACTED] Orange, New Jersey 07050.
2. I am the former partner of ROBINSSON GIOVANNI CHÁVEZ CARBAJAL and the mother of his minor child, who was born in the United States and is currently one and a half years old.
3. On November 7, 2025, Mr. Chávez Carbajal was visiting our child at my residence. I rent a portion of an attic, and other families live on the lower floors of the house.
4. While I was outside on the porch area, four men who live on the second floor, all of Mexican nationality, were drinking alcohol and began harassing me verbally.
5. Fearing for my safety, I immediately called Mr. Chávez Carbajal and asked him to come downstairs.
6. Mr. Chávez Carbajal came down only to ask the men to stop harassing me. Instead of de-escalating the situation, the four men attacked him simultaneously.
7. Mr. Chávez Carbajal acted only in self-defense. He did not initiate the confrontation and did not act aggressively.
8. The police arrived at the scene and detained Mr. Chávez Carbajal, despite the fact that he was the victim of the assault.
9. On November 10, 2025, a judge ordered his release, recognizing that he was not the aggressor and that he did not pose any danger.
10. Immediately upon his release from local custody, Mr. Chávez Carbajal was approached and arrested by ICE officers without presenting any judicial warrant or court order.
11. This arrest caused severe emotional distress to me and, most importantly, to our child.

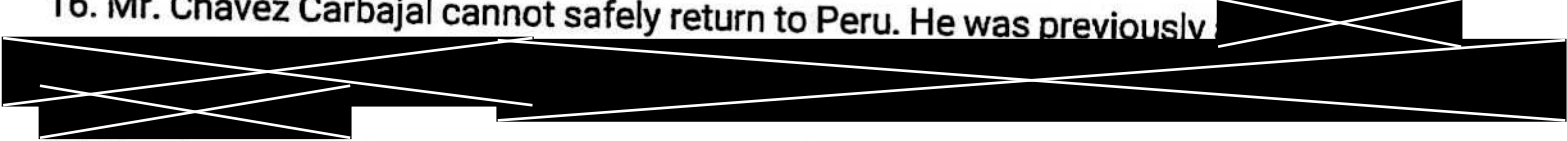
12. Mr. Chávez Carbajal is a loving, responsible, and dedicated father. He has always been actively involved in our child's life and has consistently provided emotional and financial support.

13. Since his detention, our child has suffered emotional harm due to the sudden and complete separation from his father.

14. Mr. Chávez Carbajal has no criminal record and has always conducted himself in a respectful and lawful manner.

15. He is an active member of a church congregation in Orange, New Jersey, where he is known for his good moral character.

16. Mr. Chávez Carbajal cannot safely return to Peru. He was previously



17. For these reasons, his continued detention is unjust, unnecessary, and harmful to our family.

I respectfully submit this declaration in support of the Petition for Writ of Habeas Corpus seeking Mr. Chávez Carbajal's immediate release, or alternatively, a prompt bond hearing.

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

Executed on this 30 day of DECEMBER 2025, in Orange, New Jersey.



DIANA CAROLINA ARAGÓN LEYVA

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

PROOF OF SERVICE

I, DIANA CAROLINA ARAGÓN LEYVA, hereby certify under penalty of perjury that on this date I served a true and correct copy of the following document:

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

on the Respondents listed below by depositing the same in the United States mail, first-class postage prepaid, and/or by certified mail, return receipt requested, addressed as follows:

1. MERRICK B. GARLAND

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

2. ALEJANDRO MAYORKAS

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

3. TAE D. JOHNSON

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

4. WARDEN

El Paso Processing Center
8915 Montana Avenue

El Paso, Texas 79925

5. U.S. ATTORNEY FOR THE WESTERN DISTRICT OF TEXAS
El Paso Division
700 East San Antonio Avenue, Suite 200
El Paso, Texas 79901

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

Executed on this 30 day of DECEMBER, 2025.



DIANA CAROLINA ARAGÓN LEYVA
Next Friend of Robinson Giovanni Chávez Carbajal
Address: 
Phone: 
Email: aragonleyva9716@gmail.com

NEW JERSEY MVC

AUTO DRIVER LICENSE



NOT FOR "REAL ID" PURPOSES

DL



CLASS D

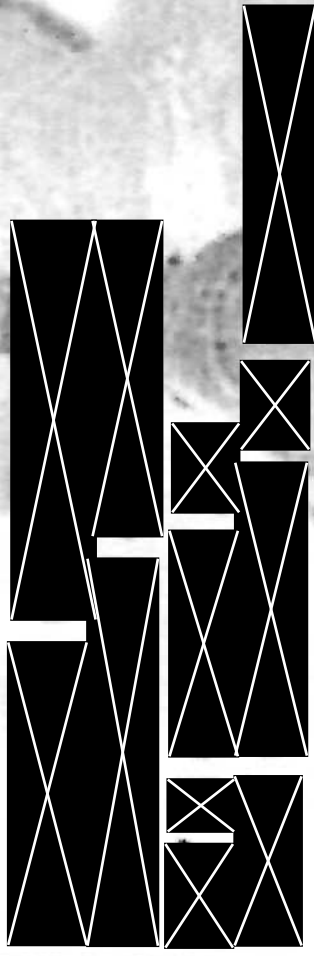
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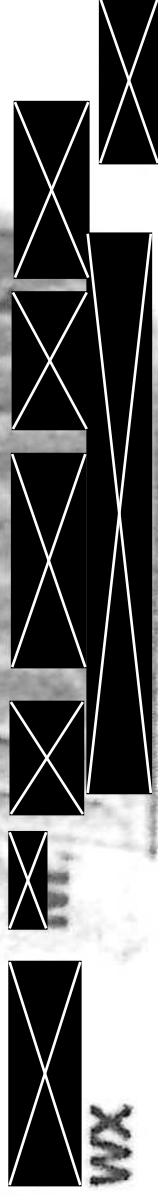
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EXP



END NONE
RESTR T



WX

OBSERVACIONES



REPÚBLICA DEL PERÚ
MINISTERIO DE RELACIONES EXTERIORES

CONSULADO GENERAL DEL PERÚ EN PATERSON

Fecha: [REDACTED]

POR EXPEDICION DE UN PASAPORTE ELECTRÓNICO O

Número de Orden: [REDACTED]

Número de Actuación: [REDACTED]

Número de Tarifa: [REDACTED]

Tasa: 70.00 SOLES CONSULARES
70.00 DÓLAR ESTADOUNIDENSE



PASAPORTE
PASSPORT

REPÚBLICA DEL PERÚ



TIPO / TYPE CODIGO PAIS / COUNTRY CODE
P PER

APELLIDOS / SURNAMES
[REDACTED]

NOMBRES / GIVEN NAMES
[REDACTED]

NACIONALIDAD / NATIONALITY
[REDACTED]

FECHA DE NACIMIENTO / DATE OF BIRTH
[REDACTED]

SEXO / SEX
M

LUGAR DE NACIMIENTO / PLACE OF BIRTH
[REDACTED]

FECHA DE EMISION / DATE OF ISSUE
[REDACTED]

FECHA DE VENCIMIENTO / DATE OF EXPIRY
[REDACTED]

DNI No. / National ID No.
[REDACTED]

PASAPORTE No. / PASSPORT
[REDACTED]



FIRMA DEL TITULAR / HOLDER'S SIGNATURE
[REDACTED]

[REDACTED]

NEW JERSEY MVC

PROBATIONARY AUTO LICENSE

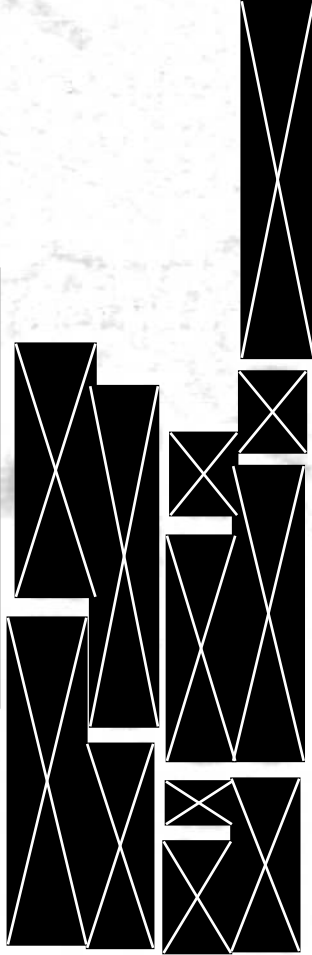
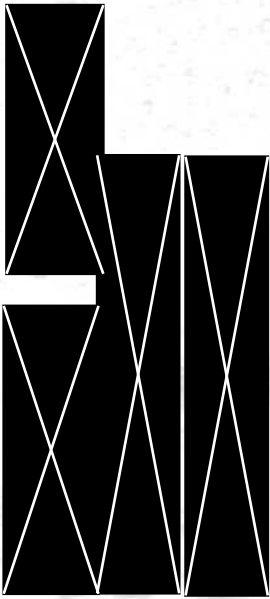
[Signature]



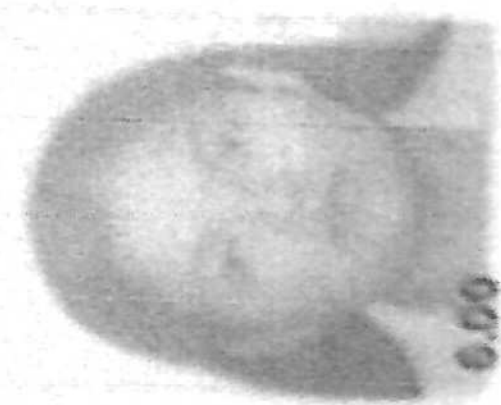
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CLASS D

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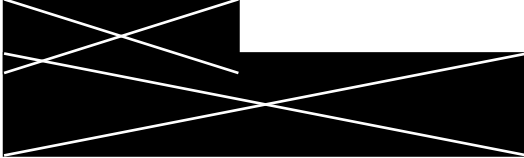


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Lori Montague

Executive Chef, Llewelyn Parq Bar & Grille



Date: December 1, 2025

To Whom It May Concern,

I am writing this letter in full support of Giovanni Chávez, whom I have had the privilege of supervising for the past year in my role as his Executive Chef and Kitchen Manager at Llewelyn Parq Bar & Grille. During this time, I have come to know Giovanni as a hard-working, reliable, and deeply committed individual, both in his professional responsibilities and in his role as a father.

Giovanni consistently demonstrated an exceptional work ethic. He arrived on time, took initiative, and could always be counted on to complete his tasks thoroughly and with pride. In the kitchen—an environment that demands teamwork, fast-paced problem-solving, and personal accountability—Giovanni stood out as someone who remained calm, focused, and dependable even under pressure.

Beyond his professional performance, Giovanni has always spoken lovingly and respectfully about his children. It is clear that he is a devoted and engaged father who takes his responsibilities to his family very seriously. His motivation to work hard and support his children was evident in everything he did. Giovanni's character reflects humility, loyalty, and an earnest desire to build a stable and productive life for himself and his family.

I firmly believe Giovanni is an asset to any community. He is a person of integrity who has demonstrated consistent dedication, responsibility, and a willingness to contribute positively in every environment he enters. It is my sincere hope that these qualities are taken into full consideration as decisions regarding his immigration case are reviewed.

If additional information is needed, I am available and willing to provide further details.

Sincerely,

Lori Montague

Executive Chef

Llewelyn Parq Bar & Grille

Frances Hayes
Assistant Manager, Llewelyn Parq Bar & Grille


Date: December 2, 2025

To Whom It May Concern,

I am writing this letter in full support of Giovanni Chávez, whom I have had the privilege of supervising for the past year in my role as his Assistant Manager at Llewelyn Parq Bar & Grille. During this time, I have come to know Giovanni as a hard-working, reliable, and deeply committed individual, both in his professional responsibilities and in his role as a father.

One of his strongest qualities is his professionalism. He treats colleagues and customers with respect, communicates clearly, and upholds all kitchen safety and sanitation protocols. His positive attitude and strong teamwork skills make him a pleasure to work with, and he consistently sets an example for others through his conduct and performance.

One of the most admirable qualities about Giovanni is his ability to balance responsibility with compassion. Since becoming a father his actions consistently reflect strong moral character and a genuine commitment to maintaining healthy, loving relationships. It is with great pride you consider his release and make great decisions regarding his immigration case that are being reviewed. If additional information is needed, I am available and willing to provide further details.

Sincerely,
Frances Hayes
Assistant Manager
Llewelyn Parq Bar & Grille

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OFFICE OF THE ESSEX COUNTY PROSECUTOR

THEODORE N. STEPHENS, II
ESSEX COUNTY PROSECUTOR

ESSEX COUNTY VETERANS COURTHOUSE, NEWARK, NEW JERSEY 07102
Tel: (973) 621-4780 Fax: (973) 621-5097

ALEXANDER B. ALBU
FIRST ASSISTANT PROSECUTOR

MITCHELL G. MCGUIRE III
CHIEF OF DETECTIVES



Robinson Chavezcarbajal
247 N Grove St
East Orange NJ 07017-4403

November 18, 2025

State v. ALFREDO GUERRA-HUERTA, EDUARDO D MENDEZ-GONZALEZ
RE: EDUARDO D MENDEZ-GONZALEZ
Prosecutor File Number: 
Indictment Number:

Estimado(a) ROBINSSON CHAVEZCARBAJAL:

Tenga en cuenta que en January 5, 2026 en 9:00 AM, el acusado mencionado anteriormente está programado provisionalmente para comparecer ante el Honorable Juez KEVIN P. BARRY para un PLEA DISP CONFERENCE. No está obligado a comparecer ante el tribunal, pero la ley le obliga a participar y recibir información sobre asuntos previos al juicio.

Como los procedimientos judiciales a menudo se posponen o se vuelven a programar, llame al número que se encuentra a continuación para verificar la fecha y la hora en que desea asistir. No tendrá la oportunidad de dirigirse a la corte en este procedimiento.

Como resultado de un PLEA DISP CONFERENCE, la Oficina del Fiscal del Condado de Essex puede celebrar un acuerdo de declaración de culpabilidad negociado. Si desea obtener una explicación de los términos de dicho acuerdo, las razones del acuerdo o si tiene alguna otra pregunta o inquietud, llame a la Oficina de Apoyo a Víctimas y Testigos al (973) 621-4689 o al (973) 621-4687.

Muy atentamente,

THEODORE N. STEPHENS, II
Essex County Prosecutor

Pamela M. McCauley
Victim-Witness Coordinator

(Letter 06B)

ESSEX COUNTY PROSECUTOR'S OFFICE
OFFICE OF VICTIM WITNESS ADVOCACY
50 West Market Street 3rd Floor
Newark, NJ, 07102

PLEA NEGOTIATION CONSULTATION FORM

STATE OF NJ VS. ALFREDO GUERRA-HUERTA, EDUARDO D MENDEZ-GONZALEZ

PROSECUTOR FILE NUMBER: 

INDICTMENT NUMBER:

DATE: November 18, 2025

As a victim of crime, you have the right to consult with a representative of the Essex County Prosecutor's Office prior to the conclusion of any plea negotiations.

Please be aware that your input is important and will be considered, however, the Prosecutor's Office retains the final legal authority to enter into a negotiated plea agreement.

If you have any questions or need assistance, please contact the Office of Victim Witness Advocacy at 973-621-4689.

Please complete this form and return it to the above address within 10 business days via USPS mail, fax: 973-621-6150 , or email: EssexVW@njecpo.org.

PLEASE CHECK ONE:

() I do NOT want to consult with a representative of the Essex County Prosecutor's Office prior to the conclusion of any plea negotiations.

() I DO want to consult with a representative of the Essex County Prosecutor's Office prior to the conclusion of any plea negotiations.

MY NAME:

MY PHONE NUMBER(S) *REQUIRED FIELD:*

YOU MUST PROVIDE A PHONE NUMBER FOR US TO CONTACT YOU

ROBINSSON CHAVEZCARBAJAL
247 N. GROVE STREET
EAST ORANGE, NJ 07017

State vs. ALFREDO GUERRA-HUERTA, EDUARDO D MENDEZ-GONZALEZ
Prosecutor File No: 

The Essex County Prosecutor's Office maintains a SECURE WEBSITE where you can log in to find information about your case, no matter where you are and no matter what time it is. By registering on this secure website you will be able to:

- ❖ Instantly receive important email updates about your case;
- ❖ Have text messages about your case sent directly to your phone;
- ❖ Request restitution for your out-of-pocket losses;
- ❖ Learn if you qualify for compensation for your lost wages, medical and counseling expenses;
- ❖ Check to see if the defendant is in jail;
- ❖ Make your feelings known regarding your case by filing a Victim Impact Statement; and,
- ❖ Learn information about your rights as a crime victim.

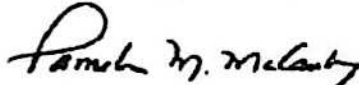
Registration is SIMPLE and SECURE and is the FASTEST way for you to receive information about your case. To register:

**Go to this website: https://www.vwportalnj.com/VWPortal_Standard/
Enter your personal, Authentication code:
107896929**

If you need further assistance, you can call the Essex County Prosecutor's Office of Victim-Witness Advocacy at (973) 621-4689 or (973) 621-4687, Monday through Friday, 9:00 a.m. to 5:00 p.m.

Very truly yours,

THEODORE N. STEPHENS, II
Essex County Prosecutor


Pamela M. McCauley
Victim-Witness Coordinator

(Letter – Portal Introduction)

Filename: Quaident 11.18.25.pdf

OFFICE OF THE ESSEX COUNTY PROSECUTOR

THEODORE N. STEPHENS, II
ESSEX COUNTY PROSECUTOR

ESSEX COUNTY 1000 NORTH STREET, SUITE 200, NEW JERSEY 07030
Tel: (973) 621-4789 Fax: (973) 621-4687

ALEXANDER R. ALBU
FIRST ASSISTANT PROSECUTOR

DETTIE D. G. SUGAR III
CHIEF OF DETENTION



Robinson Chavezcarbajal
247 N Grove St
East Orange NJ 07017-4403

November 18, 2025

State v. ALFREDO GUERRA-HUERTA, EDUARDO D MENDEZ-GONZALEZ
RE: EDUARDO D MENDEZ-GONZALEZ
Prosecutor File Number: 
Indictment Number:

Dear ROBINSSON CHAVEZCARBAJAL:

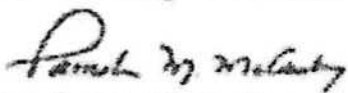
Please be advised that on January 5, 2026 at 9:00 AM, the above named defendant is tentatively scheduled to appear before the Honorable Judge KEVIN P. BARRY for a(n) PLEA DISP CONFERENCE. You are not required to appear in court but it is your right by law to have input and to be informed of pre-trial matters.

Since court proceedings are often postponed or rescheduled, please call the number below to verify the date and time if you want to attend. You will not have an opportunity to address the court at this proceeding.

As a result of a(n) PLEA DISP CONFERENCE, the Essex County Prosecutor's Office may enter into a negotiated plea agreement. If you wish to obtain an explanation of the terms of any such agreement, the reasons for the agreement, or if you have any other questions or concerns, please call the Office of Victim-Witness Advocacy at (973) 621-4689 or (973) 621-4687.

Very truly yours,

THEODORE N. STEPHENS, II
Essex County Prosecutor


Pamela M. McCauley
Victim-Witness Coordinator

(Letter 06B)



NOTICE OF HEARING IN REMOVAL PROCEEDINGS
IMMIGRATION COURT
970 BROAD STREET, ROOM 1200
NEWARK, NJ 07102

RE: CHAVEZ-CARBAJAL, GIOVANNI

FILE: ~~XXXXXXXXXX~~

DATE: Dec 21, 2021

TO:

CHAVEZ-CARBAJAL, GIOVANNI
~~XXXXXXXXXX~~
WEST ORANGE, NJ ~~XXXXXXXXXX~~

Please take notice that the above captioned case has been scheduled for a MASTER hearing before the Immigration Court on Jan 23, 2022 at 1:30 P.M. at:

970 BROAD STREET, ROOM 1200
NEWARK, NJ 07102

You may be represented in these proceedings, at no expense to the Government by an attorney or other individual who is authorized and qualified to represent persons before an Immigration Court. Your hearing date has not been scheduled earlier than 10 days from the date of service of the Notice to Appear in order to permit you the opportunity to obtain an attorney or representative. If you wish to be represented, your attorney or representative must appear with you at the hearing prepared to proceed. You can request an earlier hearing in writing.

Failure to appear at your hearing except for exceptional circumstances may result in one or more of the following actions: (1) You may be taken into custody by the Department of Homeland Security and held for further action. OR (2) Your hearing may be held in your absence under section 240(b)(5) of the Immigration and Nationality Act. An order of removal will be entered against you if the Department of Homeland Security established by clear, unequivocal and convincing evidence that a) you or your attorney has been provided this notice and b) you are removable.

IF YOUR ADDRESS IS NOT LISTED ON THE NOTICE TO APPEAR, OR IF IT IS NOT CORRECT, WITHIN FIVE DAYS OF THIS NOTICE YOU MUST PROVIDE TO THE IMMIGRATION COURT NEWARK, NJ THE ATTACHED FORM EOIR-33 WITH YOUR ADDRESS AND/OR TELEPHONE NUMBER AT WHICH YOU CAN BE CONTACTED REGARDING THESE PROCEEDINGS. EVERYTIME YOU CHANGE YOUR ADDRESS AND/OR TELEPHONE NUMBER, YOU MUST INFORM THE COURT OF YOUR NEW ADDRESS AND/OR TELEPHONE NUMBER WITHIN 5 DAYS OF THE CHANGE ON THE ATTACHED FORM EOIR-33. ADDITIONAL FORMS EOIR-33 CAN BE OBTAINED FROM THE COURT WHERE YOU ARE SCHEDULED TO APPEAR. IN THE EVENT YOU ARE UNABLE TO OBTAIN A FORM EOIR-33, YOU MAY PROVIDE THE COURT IN WRITING WITH YOUR NEW ADDRESS AND/OR TELEPHONE NUMBER BUT YOU MUST CLEARLY MARK THE ENVELOPE "CHANGE OF ADDRESS." CORRESPONDENCE FROM THE COURT, INCLUDING HEARING NOTICES, WILL BE SENT TO THE MOST RECENT ADDRESS YOU HAVE PROVIDED, AND WILL BE CONSIDERED SUFFICIENT NOTICE TO YOU AND THESE PROCEEDINGS CAN GO FORWARD IN YOUR ABSENCE.

A list of free legal service providers has been given to you. For information regarding the status of your case, call toll free 1-800-898-7180 or 304-625-2050. For information on Immigration Court procedures, please consult the Immigration Court Practice Manual, available at www.usdoj.gov/eoir.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL ☒ PERSONAL SERVICE ☐ ELECTRONIC SERVICE ☐
TO: ☒ ALIEN ☐ ALIEN c/o Custodial Officer ☐ ALIEN's ATT/REP ☐ DHS
DATE: 12/21/2021 BY: COURT STAFF A. TATUM
Attachments: ☒ EOIR-33 ☐ EOIR-28 ☒ Legal Services List ☐ Other

V3

INMATE BOOK-IN SUMMARY

MOORE DETENTION CENTER MDC

Page

BOOKING NO. : 

CELL: X BUNK -13

IDENTIFIER : 

NAME: CHAVEZ-CARBAJAL, GIOVANNI

HOME PHONE:

ADDRESS:

WORK PHONE:

C/S/Z:

D.O.B.: 

AGE: 28 SEX: Male

RACE: HISPANIC

HEIGHT: 66

WEIGHT: 150

HAIR: Black

EYES: BROW

BIRTHPLACE: PERU

D.L. NO.:

D.L. STATE:

FBI NO.:

SID NO.:

S.S.N.:



OTHER CONTACT(S)

EMERGENCY CONTACT

EMPLOYER

RELATION:

PHONE NO:

ARREST INFORMATION

OFFICER

DATE

TIME

ARRESTING: ICE

05/21/2021 06:23

RIGHTS:

BOOKING: PRUITT, S

05/21/2021 06:23

SEARCHED:

RELEASE: NIEDZIALKOWSKI, DANI

07/06/2021 12:53

LOCATION:

PHONE CALLS

Who Called

Number Called

Initial

CHARGE

WARRANT NO.

FINE

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U.S. Department of Homeland Security
U.S. Citizenship and Immigration Services

Record of Determination/Credible Fear Worksheet

DAL	ZLA		CHAVEZ CARBAJAL
District Office Code	Asylum Office Code	Alien's File Number	Alien's Last Family Name
Carmouche	Stanley		
Asylum Officer's Last Name	Asylum Officer's First Name	Asylum Officer's Title	

All statements in italics must be read to the applicant
INTERVIEW PREPARATION

SECTION I:

- 1.1 05/18/21 Date of arrival [MM/DD/YY] 1.2 Unknown Port of arrival
- 1.3 05/18/21 Date of detention [MM/DD/YY] 1.4 OCJ Place of detention
- 1.5 05/20/21 Date of AO orientation [MM/DD/YY] 1.6 N/A If orientation more than one week from date of detention, explain delay
- 1.7 06/24/21 Date of interview [MM/DD/YY] 1.8 TLS Interview site
- 1.9 ☒ Applicant received and signed Form M-444 and relevant *pro bono* list on 05/20/21
Date signed [MM/DD/YY]
- 1.10 Does applicant have consultant(s)? ☐ Yes ☒ No
- 1.11 If yes, consultant(s) name, address, telephone number and relationship to applicant
N/A
- 1.12 Persons present at the interview (check which apply)
- 1.13 ☐ Consultant(s)
- 1.14 ☒ Other(s), list: Interpreter (telephonic);
- 1.15 ☐ No one other than applicant and asylum officer
- 1.16 Language used by applicant in interview: Spanish
- 1.17 Language Line : 216682 ☒ Yes ☐ No 12:00 PM 02:41 PM
Interpreter Service, Interpreter ID Number. Time Started Time Ended
- 1.18 Interpreter Service, Interpreter ID Number. ☐ Yes ☐ No Time Started Time Ended
- 1.19 Interpreter Service, Interpreter ID Number. ☐ Yes ☐ No Time Started Time Ended
- 1.20 ☒ Interpreter was not changed during the interview
- 1.21 ☐ Interpreter was changed during the interview for the following reason(s):
- 1.22 ☐ Applicant requested a female interpreter replace a male interpreter, or vice versa
- 1.23 ☐ Applicant found interpreter was not competent 1.24 ☐ Applicant found interpreter was not neutral
- 1.25 ☐ Officer found interpreter was not competent 1.26 ☐ Officer found interpreter was not neutral
- 1.27 ☐ Bad telephone connection
- 1.28 ☒ Asylum officer read the following paragraph to the applicant at the beginning of the interview:

The purpose of this interview is to determine whether you may be eligible for asylum or protection from removal to a country where you fear persecution or torture. I am going to ask you questions about why you fear returning to your country or any other country you may be removed to. It is very important that you tell the truth during the interview and that you respond to all of my questions. This may be your only opportunity to give such information. Please feel comfortable telling me why you fear harm. U.S. law has strict rules to prevent the disclosure of what you tell me today about the reasons why you fear harm. The information you tell me about the reasons for your fear will not be disclosed to your government, except in exceptional circumstances. The statements you make today may be used in deciding your claim and in any future immigration proceedings. It is important that we understand each other. If at any time I make a statement you do not understand, please stop me and tell me you do not understand so that I can explain it to you. If at any time you tell me something I do not understand, I will ask you to explain.

Victor Reynaga Rios
Foreman, Brotherhood of the Lord of Miracles
Our Lady of Mt Carmel Church
Orange, New Jersey



December 19, 2025

To Whom It May Concern,

My name is Victor Reynaga Rios. I am a naturalized American citizen and the foreman of the Brotherhood of the Lord of Miracles of Orange, a religious organization based at Our Lady of Mt. Carmel Church in Orange, New Jersey.

I am writing this letter in support of Mr. Robinson Giovanni Chavez Carbajal, who is currently detained. I have known Mr. Chavez Carbajal for approximately three years, since he joined the Brotherhood of the Lord of Miracles, and during this time I have come to know him very well through his consistent involvement in our religious and community activities.

Mr. Chavez Carbajal has been an active and reliable member of our Brotherhood. He regularly participates in Mass, prayer services, and organizational meetings, and he frequently volunteers his time to assist with church and community events. Each October as a month-long commitment with multiple Lord of Miracles chapters in New Jersey, Mr. Chavez Carbajal faithfully helps with preparations, logistics, and participation in the processions where the Lord of Miracles altar is carried throughout various towns on Sundays. His conduct in these settings has always been respectful, cooperative, and responsible.

In my experience, Mr. Chavez Carbajal is a man of strong Catholic faith and sound moral character. He treats others with kindness and respect, is willing to help whenever asked, and demonstrates a sincere commitment to his family, his faith, and our community. I have never known him to be aggressive, dishonest, or disrespectful, and I have always found him to be calm, polite, and trustworthy.

It is my honest opinion that Mr. Chavez Carbajal's character is fundamentally good and that he has much to offer to his family and to our community. I respectfully ask that you take this letter into consideration when evaluating him and any decisions that may affect his future.

Should you require any further information or wish to speak with me directly, please do not hesitate to contact me.

Sincerely,

Victor Reynaga Rios



We the People

Of the United States,
in Order to form a more perfect Union,
establish Justice, insure domestic Tranquility,
provide for the common defence,
promote the general Welfare, and secure
the Blessings of Liberty to ourselves and
our Posterity, do ordain and establish this
Constitution for the United States of America.



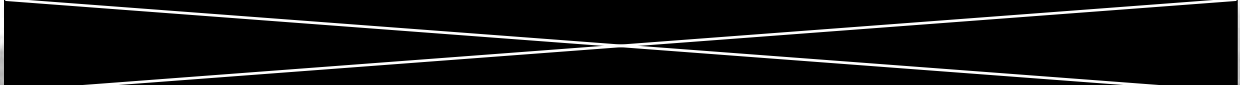
SIGNATURE OF BEARER / SIGNATURE DU TITULAIRE / FIRMA DEL TITULAR

3

PASSPORT
PASSEPORT
PASAPORTE





Type / Type / Tipo  Code / Code / Código  Passport No. / No. du Passeport / No. de Pasaporte 

P USA

Surname / Nom / Apellido 

Given Names / Prénoms / Nombres 

Nationality / Nationalité / Nacionalidad 

Date of birth / Date de naissance / Fecha de nacimiento 

Place of birth / Lieu de naissance / Lugar de nacimiento 

Date of issue / Date de délivrance / Fecha de expedición 

Date of expiration / Date d'expiration / Fecha de caducidad 

Endorsements / Mentions Spéciales / Anotaciones 

Sex / Sexe / Sexo 

Authority / Autorité / Autoridad 







