UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ANGEL ALFONSO DOMINGUEZ FUENTES
A[redacted]

Petitioner,

v.

PAMELA BONDI, U.S. Attorney General;

KRISTI NOEM, Secretary of the U.S. Department of Homeland Security;

TODD M. LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement; and

VERNON LIGGINS, in his official capacity As Acting Field Office Director of Baltimore Field Office, U.S. Immigration and Customs Enforcement.

Respondents.

Case No. 1:26-cv-00368

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. Angel A. Dominguez Fuentes ("Petitioner"), a citizen and national of Mexico, petitions this Court for a Writ of Habeas Corpus, see 28 U.S.C. § 2241, to challenge his custodial detention by the United States Department of Homeland Security, through its component arm, U.S. Immigration and Customs Enforcement ("ICE").

2. Petitioner entered the United States without inspection in April of 1995. On May 14, 2014, immigration officers arrested Petitioner on a Warrant for Arrest. *See* Exhibit A (Form I-200, Warrant for Arrest of Alien). That warrants states that the Petitioner was

"liable to be taken into custody as authorized by section 236 of the Immigration and Nationality Act." Id. They released him on his own recognizance that day "[p]ursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations." *See* Exhibit B (Notice of Custody Determination).

3. Under *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025), immigration judges across the United States, including those assigned to the immigration courts in Hyattsville and Baltimore, have uniformly stated that they lack jurisdiction to hold bond hearings for foreign nationals whom the Department of Homeland Security charges under 8 U.S.C. §§ 1182(a)(6)(A)(i) and 1182(a)(7)(A)(i)(I). There is no reason to expect that the immigration judge assigned to Petitioner's case will arrive at any different conclusion.

4. There is a growing body of case law from the federal district courts holding that Respondents' reinterpretation of 8 U.S.C. § 1225(b) is contrary to law. *See, e.g.*, *Villanueva v. Bondi*, No. 25-cv-4152-ABA, 2026 U.S. Dist. LEXIS 6852 (D. Md. Jan. 14, 2026); *Afghan v. Noem*, No. 25-cv-4105-SAG, 2025 U.S. Dist. LEXIS 264653, (D. Md. Dec. 23, 2025). This is another such case.

5. Petitioner's detention is unconstitutional and violates the Immigration and Nationality Act ("INA"). As a result of this unlawful restraint, Petitioner seeks an order from this Court requiring his immediate release or, alternatively, that the Respondents provide him with a bond hearing before a neutral and impartial adjudicator in either the Baltimore of Hyattsville Immigration Courts.

JURISDICTION AND VENUE

6. On January 29, 2026, an attorney at Griffith Immigration Law visited Petitioner at the ICE Holding Room at 31 Hopkins Plaza, Baltimore, MD 21201.[1] On information and belief, on January 29, 2026, at 11:00 a.m. a staff person at Griffith Immigration Law checked the ICE Online Detainee Locator which listed the "current detention facility" as "Call ICE for Details" and stated that he is in "BALTIMORE, MD, DOCKET CONTROL OFFICE."

7. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 ("habeas corpus"), 28 U.S.C. § 1651 ("All Writs Act"), 28 U.S.C. § 1331 ("federal question"), the INA, and U.S. CONST. amend. V (the "Due Process Clause").

8. This Court has jurisdiction to adjudicate habeas corpus claims brought by foreign nationals who challenge the legality of their detention by U.S. immigration officials. *See Reno v. Flores*, 507 U.S. 292, 307 (1993). ("It is well established that the Fifth Amendment entitles aliens to due process of law in deportation proceedings."). Title 8 U.S.C. § 1252(g) does not operate as a jurisdictional bar because that statute does not apply to actions taken to detain foreign nationals. *See Reno v. American-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 482 (1999) ("Section 1252(g) 'applies only to three discrete actions,' i.e. commencement of removal proceedings, adjudication of removal cases, and execution of removal orders"). Additionally, 8 U.S.C. § 1252(b)(9), does not preclude jurisdiction because that statute applies to review of removal orders and not to detention decisions made prior to the issuance of a removal order. *See Demore*

[1] Petitioner's detention in the Baltimore Hold Room has resulted in undersigned counsel being unable to obtain copies of pertinent documents to attach to this petition.

v. Kim, 538 U.S. 510, 517 (2003) ("'where Congress intends to preclude judicial review of constitutional claims its intent to do so must be clear.'") (quoting *Webster v. Doe*, 486 U.S. 592, 603 (1988)).

EXHAUSTION

9. A petitioner seeking habeas corpus under 28 U.S.C. § 2241 need not exhaust administrative remedies because the statute does not require it. *Compare* 28 U.S.C. § 2241 *with* 28 U.S.C. § 2254(b)(1)(A); *see McCarthy v. Madigan*, 503 U.S. 140, 144 (1992) ("where Congress has not clearly required exhaustion, sound judicial discretion governs.") (citation omitted); *see Velasquez v. Noem*, No. 25-3215-GLR, 2025 U.S. Dist. LEXIS 210601, at *4-5 (D. Md. Oct. 27, 2025).

10. "To determine whether requiring exhaustion is appropriate, federal courts must balance the interest of the individual in retaining prompt access to a federal judicial forum against countervailing institutional interests favoring exhaustion." *Veleasquez*, 2025 U.S. Dist. LEXIS 210601, at *5 (cleaned up).

11. "Here, there is no reason to require prudential exhaustion or exhaustion of administrative remedies in this Court's discretion. Though Petitioner may request a bond hearing in front of an IJ, such a request would be futile because the result of such administrative proceedings has already been 'predetermined.'" *Veleasquez*, 2025 U.S. Distr. LEXIS 210601, at *5 (quoting *McCarthy v. Madigan*, 503. U.S. 140, 148 (1992)). This is so because of the Borad of Immigration Appeals's recent decision in *Matter of Yajure Hurtado*, 29 I. & N, Dec. 216 (BIA 2025), that prohibits IJs from considering bond for noncitizens who were not lawfully admitted. *See Velasquez*, 2025 U.S. Dist. LEXIS 210601, at *6.

12. On information and belief, immigration officers did not encounter Petitioner when Petitioner entered the United States. Consequently, Petitioner is a class member in the Maldonado Bautista litigation. *See Maldonado Bautista v. Santacruz, No. 5:25-cv-01873-SSS-BFM*, 2025 U.S. Dist. LEXIS 262265 (C.D. Cal. Dec. 18, 2025).

REQUIREMENTS OF 28 U.S.C. § 2243

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

PARTIES

14. Petitioner is a native and citizen of Mexico and is now detained by Respondents in the Baltimore Holding Room, 31 Hopkins Plaza, Baltimore, Maryland. He is in the custody, and under the direct control, of Respondents and their agents.

15. Respondent Vernon Liggins is sued in her official capacity as the Field Office Director, Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement. Field Office Director Scott has immediate physical custody of Petitioner and has the authority to release him.

16. Respondent Todd M. Lyons is sued in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement and supervises and oversees Respondent Liggins.

17. Respondent Kristi Noem is sued in her official capacity as the Secretary of the Department of Homeland Security. In this capacity, Respondent Kristi Noem is responsible for the implementation and enforcement of INA, and oversees ICE, the

component agency directly responsible for Petitioner's detention. *See* 8 U.S.C. § 1103(a). Respondent Kristi Noem is a legal custodian of Petitioner.

18. Respondent Pamela Bondi is sued in her official capacity as the Attorney General of the United States. The Attorney General oversees the Executive Office for Immigration Review and, within the Executive Branch, is the arbiter of all questions of law pertaining to the INA. *See* 8 U.S.C. § 1103(a)(1), 1103(g).

STATEMENT OF FACTS

19. Petitioner entered the United States without inspection in or about April of 1995.

20. On May 14, 2014, Petitioner was encountered by immigration officers following the issuance of an immigration detainer arising from a traffic-related matter in Virginia.

21. On that same day, a Supervisory Detention and Deportation Officer issued a Warrant for Arrest for Petitioner. *See* Exhibit A. The warrant states that an immigration officer is authorized to arrest Petitioner "pursuant to sections 236 and 287 of the Immigration and Nationality Act. . ." *Id.*

22. In conjunction with his service of the warrant, the same Supervisory Detention and Deportation Officer ordered Petitioner to be released from immigration custody on his own recognizance. *See* Exhibit B. That Notice informed Petitioner that immigration authorities were acting in accordance with INA § 236, 8 U.S.C. § 1226.

23. Immigration authorities also served Petitioner with a Notice to Appear ("NTA") in immigration court to defend against the charges that he was present in the United States without having been admitted or paroled (8 U.S.C. § 1182(a)(6)(A)(i). *See* Exhibit C (Notice to Appear).

24. On April 9, 2024, an Immigration Judge sitting in the Baltimore, Maryland Immigration Court granted the parties' joint motion to dismiss the removal case against Petitioner. *See* Exhibit D (Order of the Immigration Judge).

25. On January 23, 2026, Petitioner was driving southbound on Maryland Route 295 when immigration officer stopped him. It is not clear why officers stopped the vehicle or how the immigration officers had reasonable suspicion to do so. *See United States v. Brignoni-Ponce*, 422 U.S. 873, 884 (1975) (to stop an individual for brief questioning about immigration status, the Government must have reasonable suspicion that the individual is illegally present in the United States). Thus, it appears that Petitioner's mere presence in the vehicle was sufficient, in the officers' eyes, to rise to reasonable suspicion.

26. The same day, a Deportation Officer served Petitioner with another Notice to Appear ("NTA") in immigration court to defend against the charges that he was (i) present in the United States without having been admitted or paroled (8 U.S.C. § 1182(a)(6)(A)(i). *See* Exhibit E (Notice to Appear dated January 23, 2026). A Supervisory Detention and Deportation Officer signed the NTA. The NTA charged Petitioner as present in the United States without having been admitted or paroled – and explicitly declined to charge him as an arriving alien. *See id*

27. Last year, the Board of Immigration Appeals issued a precedential decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). That decision assets that immigration judges lack jurisdiction to hold bond hearings for foreign nationals who are present in the United Staes without admission. *See id.* at 220. It bears noting that the Board issued *Yajure Hurtado* just two months after the Department of Homeland Security, through its Acting Director of U.S. Immigration and Customs Enforcement, "revisited" the

Executive Branch's decades-old position that 8 U.S.C. § 1226(a) applies to foreign nationals who have crossed the border and are apprehended in the interior of the United States. *See Martinez v. Hyde*, 792 F. Supp. 3d 211, 217-218 (D. Mass. 2025).

CLAIMS FOR RELIEF

COUNT ONE

Violation of the Immigration and Nationality Act, 8 U.S.C. §§ 1225(b) and 1226(a)

28. Petitioner incorporates and realleges all paragraphs 1-30 as if fully set forth here.

29. Respondents' theory that Petitioner is subject to mandatory detention under 8 U.S.C. § 1225(b) rests on their mistaken recent reinterpretation of the INA's detention provisions at 8 U.S.C. §§ 1225(b)(2)(A) and 1226(a).

30. Several reasons demonstrate the incorrectness of the Respondents' position that they are lawfully detaining him under 8 U.S.C. § 1225(b)(2).

31. First, the Respondents' past actions toward Petitioner demonstrate that his detention is in accordance with 8 U.S.C. § 1226.

32. In 2014, the Respondents served Petitioner with a Notice of Custody Determination stating that they were detaining him "[p]ursuant to the authority contained in section 236 of the Immigration and Nationality Act" and 8 C.F.R. § 236. *See* Exhibit B. They also served him with an Order of Release on Recognizance. *See* Exhibit F (Order of Release on Recognizance). Consistent with the Notice of Custody Determination, the Order of Release on Recognizance states that his release is "[i]n accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations." Id.

33. "'Where section 236 of the INA is codified at 8 U.S.C. § 1226, and that authority is explicitly referenced in [the Notice of Custody Determination]' it becomes clear that § 1226 is the applicable statute governing such detention." *Velasquez*, 2025 U.S. Dist. LEXIS 210601, at *12 (quoting *Maldonado de Leon v. Baker*, 2025 U.S. Dist. LEXIS 207581, at * 15-16 (D. Md. Oct. 21, 2025).

34. Second, the Respondents' theory that they are lawfully detaining Petitioner under authority set forth in 8 U.S.C. § 1252(b)(2) conflicts with the Supreme Court's opinion in *Jennings v. Rodriguez*, 583 U.S. 281 (2018).

35. In *Jennings*, the Supreme Court instructed that 8 U.S.C. § 1225(b) "applies primarily to aliens seeking entry into the United States ('applicants for admission' in the language of the statute)." *Id.* at 297. Section 1226, on the other hand, applies to aliens already present in the United States." *Id.* at 303. "Section 1226(a) creates a default rule for those aliens by permitting—but not requiring—the Attorney General to issue warrants for their arrest and detention pending removal proceedings." *Id.* "Section 1226(a) also permits the Attorney General to release those aliens on bond . . ." *Id.*

36. Petitioner has been in the United States since April of 1995. There can be no question that he is "already present in the United States." *Jennings*, 583 U.S. at 303. Under these circumstances, *Jennings* instructs that he is entitled to a bond hearing under 8 U.S.C. § 1226(a). The Respondents' reinterpretation of §§ 1225(b)(2)(A) and 1226(a) conflicts with *Jennings*.

37. Third, the Respondents' reinterpretation of §§ 1225(b)(2)(A) and 1226(a) is contrary to the recent legislative history of the INA. It is settled that a "statute should be construed so that effect is given to all its provisions, so that no part will be inoperative or superfluous,

void or insignificant . . . ." *Hibbs v. Winn*, 542 U.S. 88, 101 (2004) (internal quotations omitted)). Last year, "the Legislature amended § 1226 via the Laken Riley Act, Pub. L. No. 119-1, 139 Stat. 3 (2025), in a manner that renders the Government's interpretation of § 1225(b)(2) superfluous." *Velasquez*, 2025 U.S. Dist. LEXIS 210601, at *13. Congress added § 1226(c)(1)(E)—which requires detention for certain inadmissible noncitizens charged with crimes including burglary, theft, and larceny. "If § 1225(b) already required mandatory detention of all noncitizens who have not been admitted, these provisions would be meaningless." *Quispe-Ardiles v. Noem*, 2025 U.S. Dist. LEXIS 194069, at *16 (E.D. Va. Sept. 30, 2025).

38. Fourth, the Respondents' reinterpretation of the detention provisions "would [also] upend decades of practice. Indeed, mandatory detention for all applicants has only been the official policy of the Department of Homeland Security ("DHS") . . . since July 8, 2025, when Acting Director of U.S. Immigration and Customs Enforcement, Todd M. Lyons, issued an internal memorandum explaining that the agency had revisited its legal position" *Martinez v. Hyde*, 792 F. Supp. 3d 211, 217-218 (D. Mass. 2025) (internal quotation omitted).

39. The novelty of the Respondents' new theory of immigration detention is underscored by the conflicting pronouncements of it by the Respondents themselves. In an August 4, 2025, order, the Attorney General determined that foreign nationals arrested in the interior of the United States (other than at a port of entry) are entitled to bond hearings and are detained under 8 U.S.C. § 1226. She did this by designating as precedent "in all proceedings involving the same or similar issues" the Board's decision in *Matter of Akhmedov*, 29 I. & N. Dec. 166 n.1 (BIA 2025).

40. In *Akhmedov*, the Board considered the Department of Homeland Security's appeal of an Immigration Judge's grant of bond to a foreign national arrested in the interior of the United States. *See* 29 I. & N. Dec. at 166, 168. The Board's decision - as adopted by the Attorney General – could hardly be clearer: "The respondent's custody determination is governed by the provisions of section 236(a) of the Immigration and Nationality Act, 8 U.S.C. § 1226(a) (2018)." *Id.* at 166.

41. Just like the foreign national in *Matter of Akhmedov*, Petitioner was arrested by immigration officers in the interior of the United States. Just like the foreign national in *Matter of Akhmedov*, Petitioner is, at a minimum, entitled to a bond hearing.

42. pursuant to section 103 of the Act)." 8 C.F.R. § 1003.1(d)(1)(i).

43. By statute, the Attorney General's determinations and rulings on all questions of law pertaining to the Immigration and Nationality Act bind the Executive Branch. *See* 8 U.S.C. § 1103(a)(1). "The Board shall be governed by the provisions and limitations prescribed by applicable law, regulations, and procedures, and by decisions of the Attorney General (through review of a decision of the Board, by written order, or by determination and ruling." By statute and regulation then, it follows that the BIA's decision in Yajure Hurtado cannot stand the weight Respondents ascribe to it.

44. For all these reasons, the Respondents' assertion that they are detaining Petitioner under authority set forth in in 8 U.S.C. § 1225(b) is incorrect. The Court should therefore grant Petitioner's Petition for Writ of Habeas Corpus.

COUNT TWO

Violation of Fifth Amendment Right to Due Process

45. Petitioner incorporates and realleges paragraphs 1-44. as if fully set forth here.

46. It is settled that the Fifth Amendment's Due Process Clause applies to all "persons" within the United States. *See Matthews v. Diaz*, 426 U.S. 67, 77 (1976). The term "persons" includes foreign nationals such as Petitioner's. *See id.*

47. It is equally well settled that freedom from confinement is a core liberty interest and violation of that liberty interest raises a colorable substantive due process claim. *See, e.g., Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)); *Reno v. Flores*, 507 U.S. 292, 301 (1993) (collecting cases); *see also Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004) (bodily freedom is the "most elemental of liberty interests"). The Respondents' detention of Petitioner under these circumstances violates his substantive right to due process. *See Leal-Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025 U.S. Dist. LEXIS 165015, at *32 (D. Md. Aug. 2, 2025).

48. Petitioner also has a right to procedural due process. Immigration proceedings are civil and they are intended to be "nonpunitive in purpose and effect." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Over a century of Supreme Court precedent instructs that the Fifth Amendment entitles foreign nationals to procedural due process. *See Reno*, 507 U.S. at 306 (citing *The Japanese Immigrant Case*, 189 U.S. 86, (1903). The Respondents' refusal to provide any process whatsoever contravenes over a century of Supreme Court precedent interpreting the Due Process Clause as applying to foreign nationals such as Petitioner. *See, e.g., Mathews v. Eldridge,* 424 U.S. 319, 335 (1976).

49. To determine whether civil detention violates a detainee's Fifth Amendment procedural due process rights, courts apply the three-part test articulated in *Matthews v. Eldridge*, 424 U.S. 319 (1976). *Leal-Hernandez*, 2025 U.S. Dist. LEXIS 165015, at * 33-34. Under that test, courts must weigh (1) the private interest that will be affected by the official

action; (2) the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards; and (3) the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail. *Id.* (quoting *Mathews*, 424 U.S. at 335).

50. Petitioner invokes "'the most elemental of liberty interests'; '[t]he interest in being free from physical detention.'" *Quispe-Ardiles*, 2025 LEXIS 194069, at *17 (quoting *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004)) (alterations in original). To be sure, the Respondents' refusal to provide any process whatsoever creates significant risk that Petitioner will be deprived of that interest.

51. The Government's interest in implementing its novel reinterpretation of 8 U.S.C. § 1225(b)(2)(A) is minimal. This new "approach attempts to upend decades of immigration practice." *Hasan v. Crawford*, 2025 U.S. Dist. LEXIS 184734, at *24 (E.D. Va. Sept. 19, 2025). "Indeed, mandatory detention for all applicants has only been the official policy of the Department of Homeland Security ("DHS") . . . since July 8, 2025, when Acting Director of U.S. Immigration and Customs Enforcement, Todd M. Lyons, issued an internal memorandum explaining that the agency had "revisited its legal position. . . ." *Martinez*, 792 F. Supp. 3d at 217-218. In contrast, the resumed application of decades of agency practice will satisfy the Government's interest in enforcement of the immigration laws.

52. In Petitioner's case, all three *Mathews* factors weigh heavily in favor of holding that the Respondents' refusal to provide him with any process whatsoever violates his right to

procedural due process. The Court should grant the petition for a Writ of Habeas Corpus for this reason as well.

COUNT THREE

Petitioner is a *Maldonado Bautista* Class Member

53. On November 25, 2025, the United States District Court for the Central District of California certified a nationwide class of noncitizens who, if detained by immigration authorities, are detained under 8 U.S.C. § 1226(a), and are therefore entitled to individualized bond bearings. See PACER electronic docket, *Maldonado Bautista et al v. Santacruz*, 5:25-cv-01873-SSS-BFM, docket entries 81-82. The *Maldonado Bautista* class comprises: All noncitizens who meet the following qualifications are members of this class: All noncitizens in the United States without lawful status who (1) have entered or will have entered the United States without inspection (2) were not or will not be apprehended upon arrival; and (3) are not or will not be subject to detention under 8 U.S.C Section 1226(c), Section 1225(b)(1), or Section 1231 at the time the Department of Homeland Security makes an initial custody determination.

54. Petitioner entered the United States in April of 1995 and was not then apprehended. Petitioner is therefore a Maldonado Bautista class member and is entitled to a bond hearing.

PRAYER FOR RELIEF

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

(1) Assume jurisdiction over this matter;

(2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days;

(3) Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment and 8 U.S.C. § 1236.

(4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately or, alternatively, order that a neutral and impartial adjudicator conduct a bond hearing pursuant to 8 U.S.C. § 1236(a);

(5) Issue an order restraining immigration officials from transferring Petitioner outside of Maryland, Virginia, or Pennsylvania

(6) Grant any further relief this Court deems just and proper.

Respectfully submitted,

/s/ Anna A. Tijerina
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Attorney for Petitioner

Dated: January 29, 2025

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

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

Dated this twenty-ninth day of January 2026.

/s/ Anna A. Tijerina
Anna A. Tijerina

Attorney for Petitioner

CERTIFICATE OF SERVICE

I, Anna A. Tijerina, hereby declare that, pursuant to Federal Rule of Civil Procedure 4(i), on January 29, 2026, I directed to be served the following documents in the above-captioned matter:

- Petition for Writ of Habeas Corpus; and
- Civil Cover Sheet

I caused the aforementioned documents to be served by USPS priority mail at the following addresses:

Thomas Corcoran, Chief
Civil Division
U.S. Attorney's Office
36 S. Charles Srt., Fourth Floor
Baltimore, MD 21201

Vernon Liggins, Acting Field Office Director
Department of Homeland Security
Immigration and Customs Enforcement ERO
Baltimore Field Office
3701 Koppers St.
Halethorpe, MD 21227

Todd Lyons, Director
U.S Immigration and Customs Enforcement
500 12th St SW
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Pamela Bondi, Attorney General
Office of the Attorney General
950 Pennsylvania Ave., N.W.
Washington, DC 20530

Kristi Noem, Secretary of Homeland Security
Office of General Counsel
U.S. Department of Homeland Security 277
245 Murray Lane, SW
Mail Stop 0485
Washington, DC 20528-0485

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 29, 2026, at Baltimore, Maryland.

/s/ Anna A. Tijerina
Anna A. Tijerina

Attorney for Petitioner