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

UNITED STATES DISTRICT COURT

for the

Western District of Texas

FILED

JUL 0 2 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____
DEPUTY CLERK

EVER DOMINGO MEJÍA AMADOR,
A# [redacted]

Petitioner

v.

WARDEN, KARNES COUNTY IMMIGRATION PROCESSING CENTER

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

Case No. SA26CA4189
(Supplied by Clerk of Court)

JKP

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

Personal Information

1. (a) Your full name: EVER DOMINGO MEJÍA AMADOR,A# [redacted],
   (b) Other names you have used: N/A
2. Place of confinement:
   (a) Name of institution: Karnes County Immigration Processing Center
   (b) Address: 409 FM 1144Karnes City, TX 78118
   (c) Your identification number:
3. Are you currently being held on orders by:
   ☑ Federal authorities ☐ State authorities ☐ Other - explain:
4. Are you currently:
   ☐ A pretrial detainee (waiting for trial on criminal charges)
   ☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
   If you are currently serving a sentence, provide:
   (a) Name and location of court that sentenced you:
   (b) Docket number of criminal case:
   (c) Date of sentencing:
   ☑ Being held on an immigration charge
   ☐ Other *(explain)*:

Decision or Action You Are Challenging

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

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

6. Provide more information about the decision or action you are challenging:
(a) Name and location of the agency or court: _____
(b) Docket number, case number, or opinion number: _____
(c) Decision or action you are challenging *(for disciplinary proceedings, specify the penalties imposed)*:
(d) Date of the decision or action: _____

Your Earlier Challenges of the Decision or Action

7. **First appeal**
Did you appeal the decision, file a grievance, or seek an administrative remedy?
☐ Yes ☑ No
(a) If "Yes," provide:
(1) Name of the authority, agency, or court: _____
(2) Date of filing: _____
(3) Docket number, case number, or opinion number: _____
(4) Result: _____
(5) Date of result: _____
(6) Issues raised: _____
NOT APPLICABLE
(b) If you answered "No," explain why you did not appeal: _____

8. **Second appeal**
After the first appeal, did you file a second appeal to a higher authority, agency, or court?
☐ Yes ☐ No

(a) If "Yes," provide:

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

(2) Date of filing: _____

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

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

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

9. **Third appeal**

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

☐ Yes ☑ No

(a) If "Yes," provide:

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

(2) Date of filing: _____

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

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

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

10. **Motion under 28 U.S.C. § 2255**

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

☐ Yes ☐ No

If "Yes," answer the following:

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

☐ Yes ☐ No

If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

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

☐ Yes ☑ No

If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

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

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☐ Yes ☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: _____

(b) Date of the removal or reinstatement order: _____

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

☐ Yes ☐ No

If "Yes," provide:

(1) Date of filing:

(2) Case number:

(3) Result:

(4) Date of result:

(5) Issues raised:

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

☐ Yes ☐ No

If "Yes," provide:

(1) Name of court:

(2) Date of filing:

(3) Case number:

(4) Result:

(5) Date of result:

(6) Issues raised:

12. **Other appeals**

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

☐ Yes ☐ No

If "Yes," provide:

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

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

(c) Date of filing:

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

(e) Result:

(f) Date of result:

(g) Issues raised:

Grounds for Your Challenge in This Petition

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

GROUND ONE: _____

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

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

☐ Yes ☐ No

GROUND TWO: _____

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

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

☐ Yes ☐ No

GROUND THREE: _____

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

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

☐ Yes ☐ No

GROUND FOUR:

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

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

☐ Yes ☐ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

Request for Relief

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

Declaration Under Penalty Of Perjury

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

_____

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

Date: 6/20/26 Ever Domingo Mejia Amador Pro Se

Signature of Petitioner

_____

Signature of Attorney or other authorized person, if any

Ever Domingo Mejía Amador
A# [redacted]

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

EVER DOMINGO MEJÍA AMADOR,
A# [redacted]
Petitioner,

v. Civil Action No. _____

WARDEN, _____,
TODD M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement,
KRISTI NOEM, Secretary, Department of Homeland Security,
Respondents.

EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS

Pursuant to 28 U.S.C. § 2241

I. INTRODUCTION

Petitioner, **Ever Domingo Mejía Amador,** respectfully petitions this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, challenging the legality of his continued civil immigration detention.

Petitioner respectfully requests that this Court order his immediate release under appropriate conditions of supervision or, alternatively, grant any other relief the Court deems just and proper.

Petitioner is not serving a criminal sentence. His detention is civil in nature. He has substantial community ties, a verified residence available upon release, strong support from his church community, and individuals willing to assist him in complying with all future immigration proceedings.

Continued detention under these circumstances imposes a significant hardship while this case proceeds.

II. JURISDICTION

This Court has jurisdiction under **28 U.S.C. § 2241** because Petitioner is in federal immigration custody and challenges the legality of that detention.

Venue is proper in the Western District of Texas because Petitioner is detained within this District.

6/20/26

Ever Domingo Mejía Amador
A# [redacted]

III. THE PETITIONER

Petitioner is a citizen of Honduras.

He was born on [redacted].

He entered the United States on or about **October 14, 2022**, seeking protection after fleeing Honduras because he feared for his safety.

Petitioner was taken into ICE custody on **June 11, 2026.**

He remains detained while pursuing immigration relief.

IV. FACTUAL BACKGROUND

Before leaving Honduras, Petitioner witnessed an act of extreme violence near a river in his hometown.

Following that incident, individuals associated with the perpetrators learned that Petitioner had witnessed the crime. Petitioner began receiving threats directed at him and his family.

His mother became deeply concerned for his safety and urged him to leave Honduras because she believed his life was in danger.

Within a short period after those threats, Petitioner's cousin was killed. This tragic event reinforced Petitioner's belief that the threats against him and his family were genuine and that remaining in Honduras placed his life at serious risk.

Fearing that he would also be killed if he remained in Honduras, Petitioner fled the country and sought safety in the United States.

Petitioner did not come to the United States to commit crimes or violate the law. He came seeking protection from violence and to preserve his life.

V. PETITIONER'S CHARACTER AND COMMUNITY TIES

Since arriving in the United States, Petitioner has demonstrated that he is a hardworking, respectful, and responsible individual.

Before coming to the United States, Petitioner completed his secondary education and pursued university studies. He worked in hospital maintenance through the Código Verde program and later served as a supervisor for work crews with an energy company in Honduras.

While in the United States, Petitioner became an active member of his church community. His pastor describes him as a faithful volunteer who consistently assists with church services,

contributes financially to the congregation, and serves others with humility and integrity. A fellow church member also submitted a letter describing Petitioner's honesty, kindness, and good moral character. These letters provide substantial evidence of Petitioner's positive reputation within his community.

Petitioner also has individuals willing to provide housing and support upon his release, together with identification and employment documentation supporting the proposed custodial arrangement.

VI. CLAIMS FOR RELIEF

COUNT I

Continued Civil Immigration Detention Violates the Due Process Clause of the Fifth Amendment

Petitioner incorporates by reference all preceding paragraphs as though fully set forth herein.

Immigration detention is civil, not criminal, in nature. The Fifth Amendment guarantees that no person shall be deprived of liberty without due process of law. Because Petitioner's detention is civil, it must remain reasonably related to legitimate governmental purposes and cannot become unnecessarily prolonged or arbitrary.

Petitioner respectfully submits that his continued detention is no longer justified under the circumstances of this case. He has demonstrated substantial community ties, strong moral character, and the availability of a stable residence and support system if released. These factors substantially reduce any concern that continued detention is necessary to ensure compliance with future immigration proceedings.

Petitioner respectfully requests that this Court exercise its habeas jurisdiction and determine whether continued detention remains lawful under the Due Process Clause.

COUNT II

Petitioner Is Neither a Danger to the Community Nor a Flight Risk

Petitioner incorporates all previous allegations.

The evidence submitted with this Petition demonstrates that Petitioner has established meaningful ties to his community.

Among other things, Petitioner has:

- Strong support from his church and pastor.

• Positive character references from members of his community.

• Verified housing available immediately upon release.

• Responsible adults willing to assist him and ensure compliance with all immigration requirements.

• A history of lawful employment and productive work before arriving in the United States.

There is no indication that Petitioner presents a danger to the community. To the contrary, the evidence reflects that he has consistently conducted himself responsibly and has become a valued member of his church community.

Likewise, Petitioner does not present a significant risk of flight. If released, he will reside with his approved custodian, comply with all reporting requirements, attend every immigration hearing, and obey every lawful order issued by the Court or immigration authorities.

Under these circumstances, continued detention is not the least restrictive means of ensuring Petitioner's appearance in future proceedings.

COUNT III
Humanitarian and Equitable Considerations Support Release

Petitioner respectfully asks the Court to consider the humanitarian circumstances presented in this case.

Petitioner fled Honduras after witnessing a violent killing and subsequently receiving threats directed toward himself and his family. Shortly thereafter, Petitioner's cousin was killed, reinforcing Petitioner's belief that returning to Honduras would place his life in serious danger.

Since arriving in the United States, Petitioner has demonstrated rehabilitation, responsibility, and positive community involvement. Letters submitted by his pastor and fellow church member describe Petitioner as honest, respectful, hardworking, generous, and deeply involved in supporting his congregation.

These humanitarian and equitable considerations further support Petitioner's request that he be permitted to pursue his immigration proceedings while living with his custodian under appropriate conditions of supervision.

VII. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

A. Issue a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241;

Ever Domingo Mejía Amador
A# [redacted]

B. Declare that Petitioner's continued detention violates applicable constitutional and statutory protections to the extent supported by the facts and law presented;

C. Order Petitioner's release under reasonable conditions of supervision, or alternatively order such other relief that the Court concludes is appropriate under the circumstances;

D. Grant any additional relief that the Court deems just and proper.

Respectfully submitted,

Ever Domingo Mejía Amador
A# [redacted]

Pro Se Petitioner

VERIFICATION

I, Ever Domingo Mejía Amador, declare under penalty of perjury that I have read this Petition and that the facts stated herein are true and correct to the best of my knowledge and belief.

Executed on: 6/20/24

Signature: [signature]

Ever Domingo Mejía Amador

SA26CA4189

JKP

JS 44 (Rev. 08/18)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

Ever Domingo Mejia Amador
A# [redacted]

(b) County of Residence of First Listed Plaintiff KARNES COUNTY TEXAS
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
PRO SE
Karnes County Immigration Processing Center
409 FM 1144 Karnes City TX 78118

DEFENDANTS

Warden, Karnes County Immigration Processing Center
810 Commerce St Kerner City Texas 78118

County of Residence of First Listed Defendant Warden, Karnes County Im
(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☒ 3 Federal Question *(U.S. Government Not a Party)*
- ☐ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*

(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

Click here for: Nature of Suit Code Descriptions.

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 835 Patent - Abbreviated New Drug Application
- ☐ 840 Trademark

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 376 Qui Tam (31 USC 3729(a))
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit
- ☐ 485 Telephone Consumer Protection Act
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☒ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

V. ORIGIN *(Place an "X" in One Box Only)*

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District *(specify)* ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:

Brief description of cause:
28 U.S.C. § 2241 – Petition for Writ of Habeas Corpus (Unlawful Detention – Immigration)

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND $

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE 7/2/2026

SIGNATURE OF ATTORNEY OF RECORD
PRO SE

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____

Ever Domingo Mejía Amador
A# [redacted]

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

EVER DOMINGO MEJÍA AMADOR,
A# [redacted],

Petitioner,

v. Civil Action No. _____

WARDEN, _____, et al.,

Respondents.

MEMORANDUM OF LAW IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

I. INTRODUCTION

Petitioner Ever Domingo Mejía Amador respectfully submits this Memorandum of Law in support of his Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241.

Petitioner seeks review of his continued civil immigration detention and respectfully requests release under reasonable conditions of supervision, or such other relief as this Court determines is appropriate under the facts and applicable law.

Petitioner does not seek to avoid his immigration proceedings. He seeks only the opportunity to pursue those proceedings while residing with his custodian and complying with all lawful conditions imposed by the Court and immigration authorities.

II. LEGAL STANDARD

Federal district courts have jurisdiction under 28 U.S.C. §.2241 to consider challenges to the legality of federal immigration detention.

Civil immigration detention is subject to the protections of the Due Process Clause of the Fifth Amendment. Because immigration detention is civil rather than criminal, restrictions on liberty must remain consistent with constitutional due process requirements.

The Court has authority to determine whether continued detention remains lawful under the particular facts presented in an individual case.

III. APPLICATION TO THIS CASE

The facts presented in this case support Petitioner's request for relief.

[redacted]

After arriving in the United States, Petitioner became a productive member of his community.

The evidence submitted with this Petition demonstrates:

- Strong community support..
- Stable moral character.
- Consistent church involvement.
- Verified housing available upon release.
- Responsible custodians willing to assist him.
- Positive employment history.

These facts demonstrate that Petitioner has significant ties to his community and substantial incentives to comply with future immigration proceedings.

IV. PETITIONER IS NOT A DANGER TO THE COMMUNITY

Nothing presented in this record suggests that Petitioner presents a danger to the community. To the contrary, the evidence reflects that Petitioner has earned the trust and respect of his church, his pastor, his friends, and those willing to provide housing and supervision.

The Pastor of Iglesia Cristiana Mahanaim describes Petitioner as an honest, respectful, hardworking, generous, and faithful member of the congregation who regularly volunteers his time, assists with church services, contributes financially despite the congregation's limited resources, and demonstrates integrity in his daily life. Such evidence strongly supports Petitioner's request for release under reasonable conditions.

V. PETITIONER DOES NOT PRESENT A FLIGHT RISK

Petitioner also does not present a significant risk of flight.

If released, Petitioner will:

- Immediately reside with his approved custodian.

- Maintain a fixed residential address.
- Appear for every immigration hearing.
- Comply with every reporting requirement imposed by ICE.
- Continue participating in his church community.
- Seek lawful employment if authorized.

The existence of stable housing, responsible custodians, and strong community support substantially reduces any concern that Petitioner would fail to appear for future proceedings.

VI. EQUITABLE CONSIDERATIONS

The purpose of civil immigration detention is not punishment.

Petitioner has demonstrated positive community involvement, strong moral character, and meaningful support from family and community members.

Continued detention under these circumstances imposes substantial hardship while his immigration case remains pending.

Petitioner respectfully submits that reasonable conditions of supervision adequately address the Government's interests while permitting him to remain with his support network during the pendency of his immigration proceedings.

VII. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that this Court:

1. Grant the Petition for Writ of Habeas Corpus;
2. Order Petitioner's release under reasonable conditions of supervision, or grant such other relief as the Court deems appropriate under the facts and applicable law; and
3. Award any additional relief that justice requires.

Respectfully submitted,

6/20/26

Ever Domingo Mejía Amador
A# [redacted]

Pro Se Petitioner

Ever Domingo Mejía Amador
A# [redacted]

DECLARATION OF CUSTODIAN

DECLARATION OF MIRANDA RUSH AND BRANDON VARGAS

We, Miranda Rush and Brandon Vargas, declare under penalty of perjury under the laws of the United States that the following is true and correct:

1. We are competent adults and make this declaration voluntarily.
2. We know Ever Domingo Mejía Amador personally and are willing to provide him with housing and support if he is released from immigration detention.
3. Ever will reside in our home immediately upon his release.
4. We understand the importance of complying with all immigration court proceedings and ICE reporting requirements.
5. We are willing to help ensure that Ever attends every hearing, appointment, or reporting obligation required by immigration authorities.
6. We believe Ever is an honest, respectful, hardworking, and trustworthy person.
7. Based on our knowledge of Ever, we do not believe he presents a danger to the community or a risk of flight.
8. We understand the responsibilities associated with serving as his custodians and accept those responsibilities.
9. We respectfully ask that ever be permitted to remain with us while his immigration proceedings continue.

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

June 19 2026

Miranda Rush Brandon Vargas

Ever Domingo Mejía Amador
A# [redacted]

AFTER-RELEASE PLAN FOR EVER DOMINGO MEJÍA AMADOR

If released from immigration detention, Ever Domingo Mejía Amador will immediately reside with Miranda Rush and Brandon Vargas at their residence.

His custodians have agreed to provide him with stable housing, daily supervision, transportation to all immigration appointments if needed, and assistance in complying with every condition imposed by the Court or immigration authorities.

Ever intends to continue participating in his church community, where he has developed strong relationships and regularly volunteers his time. His church has provided letters describing his character, work ethic, and commitment to serving others.

If authorized to work, Ever will actively seek lawful employment and continue supporting himself through honest work.

He understands that he must:

- Attend every immigration hearing.
- Report to ICE as required.
- Maintain communication with immigration authorities.
- Notify the Court of any address changes.
- Comply with all conditions of release.

Ever is committed to obeying all laws and respectfully requests the opportunity to pursue his immigration case while living safely with his custodians.

Ever Domingo Mejía Amador
A# [redacted]

NON-ATTORNEY DISCLOSURE

I, **Ever Domingo Mejía Amador**, understand that the person assisting me with the preparation of these documents is **not an attorney licensed to practice law** and has not provided me with legal advice or legal representation.

I requested assistance solely in preparing documents based upon the information that I personally provided.

I have reviewed these documents before filing them and believe the factual statements contained in them are true and correct to the best of my knowledge.

I understand that I remain responsible for all information submitted in support of my immigration case.

Date: E Dom 6/20/2024

Ever Domingo Mejía Amador

Ever Domingo Mejía Amador
A# [redacted]

CERTIFICATE OF TRANSLATION

I certify that I am fluent in both the English and Spanish languages and that I am competent to translate documents from Spanish into English.

I further certify that the attached translations are true and accurate translations of the original Spanish-language documents to the best of my ability.

Date: 6/30/2026 Janeth Colemarr
210-343-2043

Ever Domingo Mejía Amador
A# [redacted]

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Petition for Writ of Habeas Corpus and supporting documents was served by United States Mail, certified mail, commercial carrier, or other authorized means upon the appropriate parties on the 1 day of July, 20 26

Respectfully submitted,
6/20/26
Ever Domingo Mejía Amador

Pro Se

7/1/2026