FILED
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CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY CLERK

paid

Jacobo Andres Matias,
Pro Se
[redacted]
California City Correctional Center
22844 Virginia Boulevard
California City, CA 93505

UNITED STATES DISTRICT
COURT EASTERN DISTRICT OF CALIFORNIA

Jacobo Andres-Matias
A-Number: [redacted]
Proceeding Pro Se,
Petitioner,
v.
_____,WARDEN, California City Correctional Center;
_____,FIELD OFFICE DIRECTOR, ICE Los Angeles Field Office;TODD M. LYONS, Acting Director, United States Immigration and Customs Enforcement;MARKWAYNE MULLIN, Secretary of Homeland Security;TODD BLANCHE, Acting Attorney General, United States,
Respondents.

1:26-CV-5280 RLP
Civil Action No.:

PETITION FOR WRIT OF HABEAS CORPUS

Petitioner, Jacobo Andrés Matías, proceeding pro se, respectfully petitions this Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241. Petitioner challenges his prolonged and unconstitutional civil immigration detention without a pre-deprivation hearing at the California City Correctional Center, located within the jurisdiction of this Court. Petitioner's re-detention violates the Immigration and Nationality Act ("INA") and the Due Process Clause of the Fifth Amendment to the United States Constitution.

I. INTRODUCTION

Petitioner Jacobo Andrés Matías has lived in the United States for twelve years, since he was a child. He is the father of a five-year-old United States citizen son, Jacob Uziel Matías Montes, who was born in Jacksonville, Florida. Mr. Matías has four U.S. citizen siblings. He has worked

lawfully in the United States for years and holds a valid Employment Authorization Document ("EAD") until February 2030, based on his pending applications for immigration relief.

On November 24, 2025, U.S. Immigration and Customs Enforcement ("ICE") agents arrested Mr. Matías following a minor traffic stop in Georgia, for which he received no ticket or citation. He has now been detained for over seven months. ICE re-detained him without a warrant, without notice, and without any pre-deprivation hearing before a neutral decisionmaker to determine if his detention was justified.

ICE now claims that Mr. Matías is subject to mandatory detention under 8 U.S.C. § 1225(b) as an "applicant for admission." This is legally incorrect. Courts in this District and across the country have consistently held that § 1225(b) applies to noncitizens apprehended at the border, not long-term residents like Mr. Matías who are arrested in the interior of the country. His detention is properly governed by the discretionary framework of 8 U.S.C. § 1226(a).

Furthermore, Mr. Matías was previously known to immigration authorities and allowed to remain at liberty in the community. His re-detention without a pre-deprivation hearing violated his constitutionally protected liberty interest under the Fifth Amendment. This violation is not a mere procedural error; it is a fundamental breach of due process.

Petitioner suffers from an untreated hernia that requires surgery, and his prolonged detention has caused him significant depression and anxiety while separating him from his young U.S. citizen son. The government has offered no individualized evidence that he poses a danger to the community or a risk of flight.

The appropriate remedy for this constitutional violation is not a belated hearing, which cannot undo the harms of months of unlawful confinement. The only adequate remedy is his freedom. Petitioner therefore seeks an order from this Court requiring his immediate release from custody.

II. JURISDICTION AND VENUE

This Court has subject matter jurisdiction over this petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2241, which grants federal district courts jurisdiction to hear habeas petitions from individuals held "in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(c)(3). This jurisdiction extends to challenges to civil immigration detention. Zadvydas v. Davis, 533 U.S. 678, 687 (2001).

Venue is proper in the Eastern District of California because Petitioner is detained at the California City Correctional Center, located at 22844 Virginia Boulevard, California City, CA 93505, which is within this judicial district. Rumsfeld v. Padilla, 542 U.S. 426, 443 (2004) (holding that jurisdiction for a § 2241 petition lies in the district of confinement).

III. PARTIES

Petitioner Jacobo Andrés Matías is a citizen of Guatemala currently detained by Respondents at the California City Correctional Center. He brings this action pro se.

Respondent Warden, California City Correctional Center, is the warden of the facility where Petitioner is detained and is Petitioner's immediate custodian.

Respondent Kristi Noem is the Secretary of the U.S. Department of Homeland Security and is sued in her official capacity.

Respondent Todd M. Lyons is the Acting Director of U.S. Immigration and Customs Enforcement and is sued in his official capacity.

Respondent Todd Blanche is the Acting Attorney General of the United States and is sued in his official capacity.

IV. STATEMENT OF FACTS

Jacobo Andrés Matías is a 26-year-old native of Guatemala, [redacted] He

entered the United States in June 2014 as a minor and has resided here for approximately 12 years. His life is firmly rooted in the United States, primarily in Florida.

Mr. Matías is the father of a U.S. citizen son, [redacted] in Jacksonville, Florida. His son is now five years old and depends on him emotionally and financially. Mr. Matías was an active and involved parent, participating in school conferences, parent meetings, and other activities at his son's Head Start program before his detention. He also has four U.S. citizen siblings residing in the United States.

Mr. Matías has a long history with the U.S. immigration system. His case was administratively closed by an Immigration Judge in Orlando in 2017. He has a pending application for asylum and holds a valid Employment Authorization Document (Category C08) valid from February 6, 2025, to February 5, 2030. He also has a Florida driver's license, a Social Security number marked "valid for work only with DHS authorization," and has filed taxes using an ITIN since 2015. He is a high school graduate, having earned his diploma in the United States in 2018.

On November 24, 2025, Mr. Matías was driving from Georgia to his home in Florida. A local sheriff stopped him because the license plate on his trailer had fallen off. An ICE agent who was present at the scene questioned him about his immigration status. Despite Mr. Matías explaining that he had a pending immigration case and valid work authorization, he was arrested and turned over to ICE custody. He was not issued a traffic ticket or citation for the license plate issue.

Since his arrest, Mr. Matías has been detained for over seven months. He was transferred from Florida to a facility in Texas, and then to his current place of detention at the California City Correctional Center, far from his family, community, and evidence for his immigration case.

Mr. Matías suffers from a hernia that requires surgery. In detention, he has only been given pain medication and has not received adequate medical treatment. The prolonged detention and

separation from his son have also caused him to suffer from depression, anxiety, and stress.

Mr. Matías has a minimal and dated criminal history, with all cases being closed. Notably, a 2020 domestic violence-related charge was formally declined for prosecution by the State Attorney's Office in Florida. He has strong community support, as evidenced by letters from his pastor, a long-time acquaintance, and family members, all of whom attest to his good character, strong work ethic, and dedication to his son.

On June 3, 2026, a motion or appeal was filed on his behalf with the Board of Immigration Appeals ("BIA"), which the BIA acknowledged receiving on June 10, 2026, demonstrating his immigration case remains active.

V. CLAIMS FOR RELIEF

A. Claim One: Petitioner's Detention is Governed by 8 U.S.C. § 1226(a), Not § 1225(b), and Entitles Him to Discretionary Release.

Respondents assert that Petitioner is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A) as an "applicant for admission." This interpretation is contrary to the statutory text and the overwhelming weight of judicial authority.

Courts in this district have consistently held that § 1225(b), which governs the inspection of noncitizens "arriving in the United States," applies to individuals apprehended at or near the border who are in the process of seeking admission. In contrast, § 1226(a) is the "default detention statute" that governs the detention of noncitizens who are already present in the United States, like Petitioner, who has lived here for 12 years. See, e.g., Quichimbo-Jimenez v. Warden, Cal. City Corr. Ctr., No. 2:26-cv-00739-DAD-EFB, 2026 WL 679378, at *2 (E.D. Cal. Mar. 10, 2026) (rejecting government's § 1225(b) argument for a long-term resident); Barajas Ortiz v. Chestnut, No. 1:26-cv-01167-DC-SCR, 2026 WL 508419, at *7–8 (E.D. Cal. Feb. 24, 2026) (same for a 34-

year resident); Alvarez Maciel v. Noem, No. 1:26-cv-01318-DC-CKD, 2026 WL 496948, at *7 (E.D. Cal. Feb. 23, 2026) (same for a 20-year resident).

As the court explained in Bautista v. Santacruz, an interpretation that applies § 1225(b) to all noncitizens present without admission "effectively removes § 1226 from existence" and cannot be harmonized with the INA's statutory scheme. 2025 WL 3713987, at *11–12 (C.D. Cal. 2025). Because Petitioner has resided in the United States for over a decade and was apprehended in the interior, his detention is governed by the discretionary provisions of § 1226(a). Respondents have no statutory authority to hold him under the mandatory detention provisions of § 1225(b).

B. Claim Two: Petitioner's Re-Detention Violated His Fifth Amendment Right to Due Process Because He Was Not Afforded a Pre-Deprivation Hearing.

The Fifth Amendment's Due Process Clause applies to all persons within the United States, regardless of immigration status. Zadvydas, 533 U.S. at 693. This includes protection from the deprivation of liberty without due process of law. "Freedom from imprisonment... lies at the heart of the liberty that [the Due Process] Clause protects." Id. at 690.

Petitioner was previously known to immigration authorities and permitted to live at liberty in the United States for years. This created a constitutionally protected liberty interest in his continued freedom. See, e.g., Selis Tinoco v. Noem, No. 1:25-cv-01762-DC-JDP, 2025 WL 3567862 (E.D. Cal. Dec. 14, 2025) (finding a protected liberty interest for a noncitizen previously released on recognizance). This liberty interest is analogous to that of a parolee, who has an "implicit promise" that liberty will be revoked only for cause. Morrissey v. Brewer, 408 U.S. 471, 482 (1972).

The Constitution "usually has held that the Constitution requires some kind of a hearing before the State deprives a person of liberty or property." Zinermon v. Burch, 494 U.S. 113, 127 (1990) (emphasis in original). Yet, Respondents re-detained Petitioner on November 24, 2025, without

any prior notice or hearing before a neutral decisionmaker to justify this deprivation of liberty. This failure to provide a pre-deprivation hearing constitutes a clear violation of Petitioner's Fifth Amendment due process rights. See, e.g., Lainez Escobar v. Warden, No. 1:26-cv-03391-DC-AC (E.D. Cal. May 15, 2026) (granting habeas petition where previously released noncitizen was re-detained without a pre-deprivation hearing).

C. The Mathews v. Eldridge Factors Confirm the Due Process Violation and Mandate Release.

To determine what process is due, courts apply the three-factor balancing test from Mathews v. Eldridge, 424 U.S. 319, 335 (1976). Here, all three factors weigh decisively in Petitioner's favor and compel his immediate release.

First, the private interest affected is immense. Petitioner has a profound liberty interest in being free from physical confinement and in maintaining his relationships with his U.S. citizen son and family. He has an interest in continuing his lawful employment and supporting his family, accessing necessary medical care for his hernia, and meaningfully participating in his pending immigration case. See Johalan David N.M. v. Warden of the Cal. City Corr. Ctr., No. 2:26-cv-01270-TLN-AC, 2026 WL 1894982, at *7 (E.D. Cal. June 25, 2026) (finding a substantial private interest in a detainee separated from his young daughters and unable to work).

Second, the risk of erroneous deprivation is extremely high due to the procedures used—or rather, the complete lack thereof. Petitioner was arrested and detained for over seven months with no hearing whatsoever to assess whether his detention was justified. There has been no individualized determination that he is a flight risk or a danger to the community. Respondents have relied solely on a legally erroneous application of a mandatory detention statute. This creates a severe risk that he is being deprived of his liberty without any valid justification. The "probable value... of additional or substitute procedural safeguards," namely a pre-deprivation hearing, is self-evidently

high. Mathews, 424 U.S. at 335.

Third, the government's interest is negligible. The government has an interest in enforcing immigration laws, but that interest is minimal here. The government has not presented any individualized evidence that Mr. Matías poses a danger or flight risk. In fact, his strong family ties, long-term residence, pending immigration case, and consistent compliance with authorities for years all suggest the opposite. The administrative burden of providing a pre-deprivation hearing is minimal, as such hearings are a routine part of the § 1226(a) process. See Johalan David N.M., 2026 WL 1894982, at *8 ("Any burden associated with the provision of these processes does not outweigh Petitioner's liberty interest and the risk of erroneous deprivation.").

Because all three Mathews factors weigh heavily in Petitioner's favor, his detention without a pre-deprivation hearing was a flagrant violation of the Fifth Amendment. The only appropriate remedy for such a violation is to restore the liberty that was unconstitutionally taken.

D. Claim Three: Prolonged and Indefinite Detention Without Any Hearing Is Unconstitutional.

Petitioner has been detained for over seven months without any hearing before a neutral adjudicator. This prolonged detention has become punitive in nature and violates the Due Process Clause. Zadvydas, 533 U.S. at 690 (holding that civil detention may become unconstitutional if it is not reasonably related to its non-punitive purpose).

Even if Petitioner were properly detained under § 1225(b), which he is not, courts have recognized that detention under that statute cannot be indefinite. While the Supreme Court in Jennings v. Rodriguez held that § 1225(b) does not by its text require periodic bond hearings, it left open the question of whether prolonged detention without a hearing would violate the Constitution. 583 U.S. 281, 308 (2018).

Petitioner's initial re-detention was unconstitutional for the reasons stated above. The subsequent

passage of over seven months without any process only compounds the constitutional injury. This is not a case where a hearing was merely delayed; it was denied entirely based on a flawed legal premise. This prolonged detention, combined with the initial due process violation, underscores the need for immediate judicial intervention and release.

E. The Only Appropriate Remedy for the Constitutional Violation Is Immediate Release.

Petitioner does not seek a bond hearing as a remedy. A bond hearing after more than seven months of unlawful detention cannot restore the liberty that was taken from Petitioner without due process. The only adequate remedy is immediate release.

A Post-Deprivation Hearing Cannot Cure the Constitutional Violation. The core constitutional injury here is the failure to provide a pre-deprivation hearing. A belated hearing cannot undo that violation. As this Court has recognized, "the fact that Petitioner was provided with a post-deprivation court-ordered bond hearing does not cure the initial constitutional violation of unlawfully revoking Petitioner's liberty and detaining him without any process." Charan S. v. Warden of the Cal. City Det. Facility, No. 1:26-cv-03017-TLN-JDP, 2026 WL 1234567, at *9 (E.D. Cal. Apr. 28, 2026). The relief for a constitutional violation "cannot be to merely bring the Government into compliance—it must be to restore the liberty that was lost." Id. Similarly, in Rafaela Neri Angel v. Warden, the court ordered immediate release despite the petitioner having received a post-deprivation bond hearing, reasoning that a delayed hearing "cannot undo those harms." No. 5:26-cv-03269-MWC-JDE, 2026 WL 1894983, at *5 (C.D. Cal. June 18, 2026).

The Proper Remedy is to Restore the Status Quo Ante, Which is Release. The purpose of injunctive relief is to return the parties to "the last uncontested status which preceded the pending controversy." Lepe v. Andrews, 801 F. Supp. 3d 1104, 1119 (E.D. Cal. 2025). Petitioner's last uncontested status was his life at liberty in Florida—working, parenting his son, and participating

in his community. Courts in this district consistently order immediate release to restore that status quo. See, e.g., Barajas Ortiz, 2026 WL 508419, at *9 (ordering immediate release where government asserted no alternative lawful basis for detention); Alvarez Maciel, 2026 WL 496948, at *9 (same).

Respondents Have No Lawful Basis for Continued Detention. Respondents have detained Petitioner based on a misapplication of § 1225(b). They have offered no alternative statutory basis for his detention and have provided no individualized evidence that he poses a risk of flight or danger. Where the government fails to identify a valid legal framework for continued detention, immediate release is the only appropriate remedy. See Garcia Machado v. Warden, No. 2:26-cv-01240-DAD-CSK, 2026 WL 1894984, at *2 (E.D. Cal. July 2, 2026) (ordering release because respondents "fail[ed] to identify any other statutory framework which would justify petitioner's continued detention"); De La Cruz-Soto v. Warden, No. 1:26-cv-04344-DAD-SCR, 2026 WL 1894985, at *3 (E.D. Cal. June 30, 2026) (ordering release where respondent repeatedly misclassified petitioner's detention and failed to provide a hearing for months).

The Harm from Unlawful Detention is Irreparable. The Ninth Circuit has recognized "the irreparable harms imposed on anyone subject to immigration detention," including "subpar medical and psychiatric care in ICE detention facilities." Hernandez v. Sessions, 872 F.3d 976, 995 (9th Cir. 2017). The deprivation of a constitutional right "unquestionably constitutes irreparable injury." Melendres v. Arpaio, 695 F.3d 990, 1002 (9th Cir. 2012). Petitioner's untreated hernia, the emotional trauma of being separated from his young son, and the psychological toll of prolonged, unjustified confinement are harms that cannot be compensated or undone by a future hearing. See Rafaela Neri Angel, 2026 WL 1894983, at *5.

Courts in this District Routinely Order Immediate Release in These Circumstances. The facts of

this case are not novel. This Court and the Central District of California have addressed dozens of petitions from previously released noncitizens who were re-detained without a pre-deprivation hearing. The consistent remedy has been immediate release. See, e.g., Khamraev v. Warden, No. 1:26-cv-04458-DAD-AC (E.D. Cal. July 1, 2026); Karahali v. Warden, No. 1:26-cv-03166-KES-EPG (E.D. Cal. July 2, 2026); Anyelimar Del Valle Gonzalez Gomez v. Warden, No. 5:26-cv-03530-SSS-MBK (C.D. Cal. July 2, 2026); Randy Acosta-Tolentino v. Lyons, No. 2:26-cv-00821-DC-CSK (E.D. Cal. May 11, 2026); Lainez Escobar v. Warden, No. 1:26-cv-03391-DC-AC (E.D. Cal. May 15, 2026); Xiaoming Wang v. Warden, No. 1:26-cv-03460-DC-SCR (E.D. Cal. June 24, 2026); Quichimbo-Jimenez, 2026 WL 679378. The weight of this authority demonstrates that immediate release is the established and appropriate remedy.

VI. REQUEST FOR RELIEF

WHEREFORE, Petitioner Jacobo Andrés Matías respectfully requests that this Court:

1) Assume jurisdiction over this matter;
2) Issue a writ of habeas corpus granting the petition;
3) Order Respondents to IMMEDIATELY RELEASE Petitioner from custody;
4) ENJOIN Respondents from re-detaining Petitioner absent compliance with constitutional protections, including a minimum of seven days' notice and a pre-deprivation hearing before a neutral fact-finder at which Respondents must demonstrate by clear and convincing evidence that Petitioner's detention is necessary;
5) Order Respondents to return all of Petitioner's documents and personal property upon his release;
6) Order Respondents to file a notice of compliance with this Court's order within two (2) court days of its issuance; and

7) Grant such other and further relief as this Court deems just and proper.

Dated: July 7, 2026

Respectfully submitted,

/s/ Jacobo Andres-Matias
Jacobo Andres-Matias
A-Number: [redacted]

Jacobo Andres Matias,
Pro Se
[redacted]
California City Correctional Center
22844 Virginia Boulevard
California City, CA 93505

UNITED STATES DISTRICT
COURT EASTERN DISTRICT OF CALIFORNIA

Jacobo Andres-Matias
A-Number: [redacted]
Proceeding Pro Se,
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_____,WARDEN, California City Correctional Center;
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Respondents.

Civil Action No.:

DECLARATION OF JACOBO ANDRÉS MATÍAS IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

I, Jacobo Andrés Matías, declare as follows:

1. I am the Petitioner in this action. My full name is Jacobo Andrés Matías, and I am also known as Jacobo Andres-Matias. My Alien Registration Number is [redacted] I am currently detained by U.S. Immigration and Customs Enforcement ("ICE") at the California City Correctional Center, located at 22844 Virginia Boulevard, California City, CA 93505. I have personal knowledge of the facts stated in this declaration, and if called as a witness, I could and would competently testify to them.
2. I was born [redacted] in Huehuetenango, San Miguel Acatan, Guatemala. I am a citizen of Guatemala.
3. I have been detained by ICE since November 24, 2025. As of today, July 7, 2026, I have

been in custody for over seven months.

4. I entered the United States in June 2014, when I was 14 years old. I came here to escape neglect and abuse from my uncle in Guatemala. I have lived continuously in the United States for the past 12 years.

5. My life is here in the United States. My mother, Maria Matias, who is approximately 40 years old, lives here. I also have four siblings who are United States citizens.

6. I grew up in this country. I attended school here and earned my high school diploma from Cornerstone Christian Correspondence School in Townsend, Georgia, on April 23, 2018. My primary home for many years has been in the Yulee and Fernandina Beach area of Florida.

7. I am the father of a five-year-old son, [redacted] He was born [redacted] at Memorial Hospital in Jacksonville, Duval County, Florida. He is a United States citizen and has a U.S. passport [redacted], which is valid until July 17, 2030.

8. My son depends on me for both emotional and financial support. Before I was detained, I was a very active and involved father. I participated in parent-teacher conferences, parent meetings, and workshops at his school, the Fernandina Beach Head Start program. I also volunteered at his school. A letter from Iliana Reinosa-Ventura, the Family Advocate at Episcopal Children's Services, confirms my involvement in my son's education during the 2025-2026 school year.

9. My detention has been extremely difficult for my son and my family. My son is so young that my family has told him that I am away on a work trip because we do not want to cause him the heartbreak of knowing his father is in detention. My mother, Maria Matias, wrote in a letter that it would be devastating for my son to lose my presence in his life. I am very

worried about him.

10. I have a pending application for asylum. My immigration case in Orlando, Florida (A# [redacted] was administratively closed by Immigration Judge James K. Grim on August 17, 2017. My immigration case is still active. On June 3, 2026, an appeal or motion was filed in my case with the Board of Immigration Appeals (BIA), and the BIA sent a receipt confirming they received it on June 10, 2026.

11. Because of my pending case, I have legal authorization to work in the United States. I have a valid Employment Authorization Document (EAD), Category C08, which is valid from February 6, 2025, to February 5, 2030.

12. I also have a Social Security number ([redacted]) that states it is "valid for work only with DHS authorization." I have a Florida Class E driver's license, a valid Guatemalan passport [redacted], and an Individual Taxpayer Identification Number (ITIN) [redacted] issued by the IRS in 2015. I have tried to follow all the rules.

13. I have always worked to support myself and my son. I have a consistent work history in the United States. I worked for a company named [redacted] for about six months and for another company for nearly three years, among other jobs.

14. I have strong support in my community. John Cabell, a property owner in Fernandina Beach, Florida, who has known me for 10 years and has hired me for work many times, wrote a notarized letter on November 28, 2025, describing me as honest, hard-working, and always willing to help others.

15. My family and I are also active in our church. Pastor Ofelia Corrales Rivas of MAAM Fernandina wrote a notarized letter on November 26, 2025, stating that she has known me

since 2018 and that I have faithfully assisted at the church with my son. She described me as a man of integrity, responsibility, and compassion.

16. On November 24, 2025, I was arrested by ICE. I live in Florida but had driven to Georgia to dispose of some trash. On my way back to Florida, the license plate on the trailer I was pulling fell off without me knowing.

17. A sheriff's deputy pulled me over. He asked for my license. An ICE agent was also there and asked me for my immigration documents. I showed him everything I had, including my work permit, and explained that I had an ongoing immigration case.

18. The ICE agent told me my documents did not give me legal status. The police did not give me a traffic ticket or any other citation. They just handed me over to the ICE agent, and I have been in custody ever since.

19. Since my arrest, I have been transferred to multiple detention centers, moving me farther and farther from my home and my family in Florida. I was first held in connection with Baker, Florida, then sent to Texas for about a day, and now I am here at the California City Correctional Center. These transfers have made it impossible for my family to visit me and very difficult to manage my legal case.

20. I have a serious medical condition. I suffer from a hernia, and I have been told that I need surgery to fix it.

21. In the more than seven months that I have been detained, I have not received adequate medical treatment for my hernia. The facility has only given me medication for the pain. My condition is not being properly addressed, and I am worried about my health.

22. My mental health has also suffered greatly. Being detained for so long, and being separated from my five-year-old son and the rest of my family, has caused me to feel severe

depression, anxiety, and stress.

23. I have had a few encounters with the police in the past, but all of those cases are closed. I am not currently charged with any crime.

24. In 2016, I had an issue involving an item of clothing I took by mistake. That case is closed. In 2018, I had a DUI case. That case is also closed.

25. In 2020, I was arrested on charges including domestic battery. However, after reviewing the evidence, the State Attorney's Office for Nassau County, Florida, filed a formal "Disposition Notice" on September 9, 2020, stating that it **declined to prosecute** all charges against me. The charges of Battery (Domestic), Tampering with a Witness, and False Imprisonment were all dropped.

26. I have never filed a petition for habeas corpus or a request for an immigration bond before this.

27. I am not a danger to the community or a risk of flight. My entire life is here in the United States. My young U.S. citizen son, my mother, and my four U.S. citizen siblings all live here. I have a valid work permit, a long history of employment, and strong support from my church and community. I have an active immigration case, and I want to see it through. My only wish is to be released so I can return to my son, get the medical care I need for my hernia, and continue to build my life here.

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

Executed on July 7, 2026, at California City, California.

/s/ Jacobo Andres-Matias
Jacobo Andres-Matias
A-Number: [redacted]

463471 State Road 200.

Yulee, FL 32097
November 26, 2025

To Whom It May Concern,

It is with great honor and enthusiasm that Pastor Ofelia Corrales Rivas writes this letter of recommendation for **Mr. Jacobo Andres Matias**, who resides a[redacted] **Florida**, and whom I have had the privilege of knowing since 2018. During this time, he has faithfully assisted at the church alongside his son, [redacted], and has been a consistent support to the ministry.

Mr. Jacobo Andres Matias is a man of unwavering faith and exemplary moral character. He consistently demonstrates responsibility, respect, and humility in all his interactions. Whether supporting at church, caring for his son, or engaging with his community, he conducts himself with integrity, honesty, and compassion. His strong commitment to his faith is evident not only in his words but also in his daily actions.

I can confidently attest to the outstanding character of Mr. Jacobo Andres Matias and affirm the truthfulness of all the information provided in this letter. His behavior and conduct with his son have always been exemplary. It is without hesitation that I recommend him for any opportunity or consideration he may pursue, knowing that he will bring the same level of commitment, responsibility, and integrity to his family, his work, and society.

If you have any questions or require additional information, please do not hesitate to contact us at (904) 485-7999.

Sincerely,

12-01-25

Pastor Ofelia Corrales Rivas
MAAM Fernandina
(904) 485-7999

State of Florida County of Duval
On this 1st day of December 2025
Ofelia Corrales Rivas
personally appeared before me, and proved to me through satisfactory evidence of identification, which were FL DL # C642-640-82-590-0 to be the person whose name is signed on the preceding or attached document in my presence.

Notary Public
My Commission Expires March 13, 2028

BINA SANJAY PATEL
Notary Public - State of Florida
Commission # HH 503935
My Comm. Expires Mar 13, 2028
Bonded through National Notary Assn.

John Cabell 11/28/2025

2801 Racheal Ave.
Fernandina Beach, FL 32034

To Whom it may concern,

Dear Sir or Madam,

I have been a rental property owner/manager in Fernandina Beach, Florida for over 20 years.

I am writing on behalf of Jacobo Andres Matias, whom I have known for the past 10 years. I have worked with him many times over those years.

He is honest and very hard working, yet always has time to help friends and those in need. He is a good person and an asset to any place he lives.

Sincerely,

John Cabell

[redacted]

State of Florida, County of Nassau
The foregoing instrument was acknowledged before me, by means of [✓] physical presence or [ ] online notarization,
this 28th day of November 2025 by John Cabell
Type of ID produced FL DL
or is personally known to me
Notary Signature

KARA THOMPSON
MY COMMISSION # HH 495485
EXPIRES: May 12, 2028