JUDGE KATHLEEN CARDONE

FILED
AUG 25 2026
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____
DEPUTY CLERK

United States District Court
Western District Court of Texas
El Paso Division

Jesus Manuel Dorado
A[redacted]
Petitioner,

V.

EP26CV2209

Case No: _____

Warden of Camp East Montana,
DHS Secretary Mark Wayne Mullin,
Director of ICE Todd M. Lyons,
US Attorney General Todd Blanche,
Regional Director of ICE Mary de Anda Ybarra,
Respondents.
_____/

Memorandum of law

COMES NOW Petitioner Jesus Manuel Dorado, a pro se comes before the court in good faith and amends 2 (5th) ground to his petition for writ of habeas corpus in support of this petition. Petitioner is a Citizen and National of Cuba.

Petitioner Raises the Zadvydas v Davis claim while is a statutory challenge under Section 1231 (a), whether his detention, at this point "bears a reasonable relation to the purpose for which he is committed", is a question of due process under the fifth Amendment.

Similarly, due process is the proper vehicle to challenge respondents' failure to follow their own regulations in violation of the Accardi Doctrine. See Ayala Chapa v Bondi 132 F 4th 796 799 & N3 (5th) Cir 2025.

Petitioner argues; once a non-citizen is ordered removed from the United States the INA requires that removal generally occur within ninety days. 8 U.S.C. Section 1231 (a)(1)(A).

The removal period maybe extended in at least three circumstances, relevant here, a non-citizen maybe detained beyond the removal period if he is "(1) inadmissible, (2) removable as a result of a violation of statutes requirements, entry conditions or the criminal or for national security or foregoing policy reason; or (3) a risk to the community or unlikely to comply with the removal order. If any of these grounds apply, the statute imposes no limit on the time a person may be detained. Because "[a] statue permitting indefinite detention... would raise a serious constitutional problem" the Supreme Court has "read an implicit limitation" into the statute and has held that non-citizen may only be detained for a period reasonably necessary" to effectuate their removal. Zadvydas, 533 U.S. 689.

Petitioner argues that Cuba is a country that historically refuses repatriation of its emigres from the United States and ICE has confirmed Cuba will not accept Petitioner for repatriation. Venezuela has refused Petitioner in the past and denied Petitioner entry during ICE's most recent April 24, 2026 removal attempt **(Petitioner renounced the Venezuelan citizenship in 2011, Exhibit 1).** Third country removal not of petitioner origin and/or citizenship is illegal and unconstitutional. Petitioner's removal is not likely to happen in the foreseeable future, and ***"If removal is not practically attainable, detention no longer serves its statutory purpose of assuring the alien presence at the moment of removal."***

Petitioner's detention is clearly without a valid reason, it's a violation of the due process and the fifth amendment of the United States Constitutional as well as a violation of Equal protection Rights.

Petitioner is challenging the legality of this detention under a framework devised by the Supreme Court for District Court to apply. see Zadvydas 533 U.S. AT 682 (Stating the court limitation on post-removal detention "is subject to federal-court review"). A decision in petitioner favor would not impair ICE's ability to execute the removal order. The INA does not strip the court of jurisdiction over this action.

Petitioner points to the merits of his Due Process claim "once a non-citizen's order of removal becomes administratively final, the government shall remove the person within90 days."Sing v U.S. Attorney Gen 945 F3J 1310, 1313 (11th Cir 2019)(quoting 8 U.S.C. Section 1231(a)(1)(A)).

The government must detain the non-citizen during the 90 day removal period, which begins when the removal under becomes administratively final, but not cannot detain indefinitely.

In Zadvydas v Davis the supreme Court held "if removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by the statue" 533 U.S. 679, 700-01 (2001). If removal is not practically attainable, detention no longer serves its statutory purpose of "assuring the aliens presence at the moment of removal" Id at 699. The court found it unlikely Congress "believed that all reasonably foreseeable removal could be accomplished in 90 days" Id at 701. So for the sake of uniform administration in the federal courts, "it established a presumptively reasonable period of detention" of six months (the 90 day removal period plus an additional 90 days). Id court use a burden shifting framework to dodge the constitutionality of additional detention.

The government may argue that petitioner petition is premature because his current detention has not exceeded 180 days. They may assume a six month presumptively reasonable period of detention starts each time a non-citizen is detained. That assumption is inconsistent with Zadvydas. It would effectively allow DHS/ICE to detain non-citizens indefinitely and avoid judicial scrutiny by releasing and re-detaining them every 180 days. "Supreme Court stated rationale for establishing a presumptively reasonable six-month period for detention pending removal supports our conclusion that period commences at the beginning of the removal period". Akinwale v Ashcroft, 287 F3d 1050, 1052 n.3 (11th

Cir 2002). Courts typically consider the cumulative time spent in detention when evaluating a ***habeas*** claim challenging detention as unreasonable per Zadvydas. Vo v. Bondi, No. 2:25-CV-02244, 2025 U.S. Dist. LEXIS 261020, 2025 WL 3653722, at *3 (W.D. Wash. Dec. 17, 2025) ("The presumptively reasonable period of detention does not reset each time a non-citizen is detained; rather, the ***aggregate*** time in detention post removal order is considered."); see, e.g., Giorges v. Kaiser, No. 25-cv-7683, 2025 U.S. Dist. LEXIS 201578, 2025 WL 2898967, at *8 n.5 (N.D. Cal Oct. 10, 2025); Bulle v. Wesling, No. 26-CV-019, 2026 U.S. Dist. LEXIS 12549, 2026 WL 183840, at *4 (D.R.I. Jan. 23, 2026).

Because the six-month period for presumptively reasonable detention has expired, Zadvydas's burden shifting framework applies. Petitioner has carried his initial burden by showing good cause to believe there is no significant likelihood of removal in the foreseeable future. ICE has been unable to remove him since April 4th, 2016, and ICE has confirmed that the Cuban Government will not accept Petitioner for repatriation.

On April 24th, 2026, ICE attempted removal to Venezuela but were unsuccessful as Venezuela refused Petitioner entry upon arrival after Venezuelan Immigration Authorities verified Petitioner does not have Venezuelan citizenship. ICE had not even obtained any travel documents nor confirmation from Venezuela that it would accept Petitioner prior that removal attempt and still has not. Petitioner was immediately returned to the U.S. on the same plane, same day. Petitioner argues that the burden thus shifts to the government. Back in April 22, 2016, nearly ten years ago, the Venezuelan Embassy had already replied to Petitioner stating that it would be impossible to materialize the legal requirements to recover the Venezuelan citizenship **(Exhibit 2)**, thus Petitioner was released on Order of Supervision on July 7th, 2016 **(Exhibit 3)**. On August 10, 2026, ICE confirmed again Cuba will not accept Petitioner. ICE has alleged third country removal a possibility but the attempt to carry out these removals have been an informal effort to compel voluntary departure, not an above board removal attempt that complies with statutory and constitutional requirements. See Andriasian v. Immigr. and Naturalization Serv. 180 F.3d 1033, 1041 (9th Cir 1999)("failing to notify individuals who are subject to deportation that they have the right to apply for asylum in the United States and for withholding of deportation to the country to which they will be deported violates both INS regulations and constitutional rights to Due Process") See also D.V.D. v. U.S. Dept of Homeland Security, --- F.Supp.3d---, 2026 WL 521557 (D. Mass Feb 25, 2026)(setting aside DHS's current third country removal policy because it violates non-citizens' right to seek fear based relief under convention against torture.)

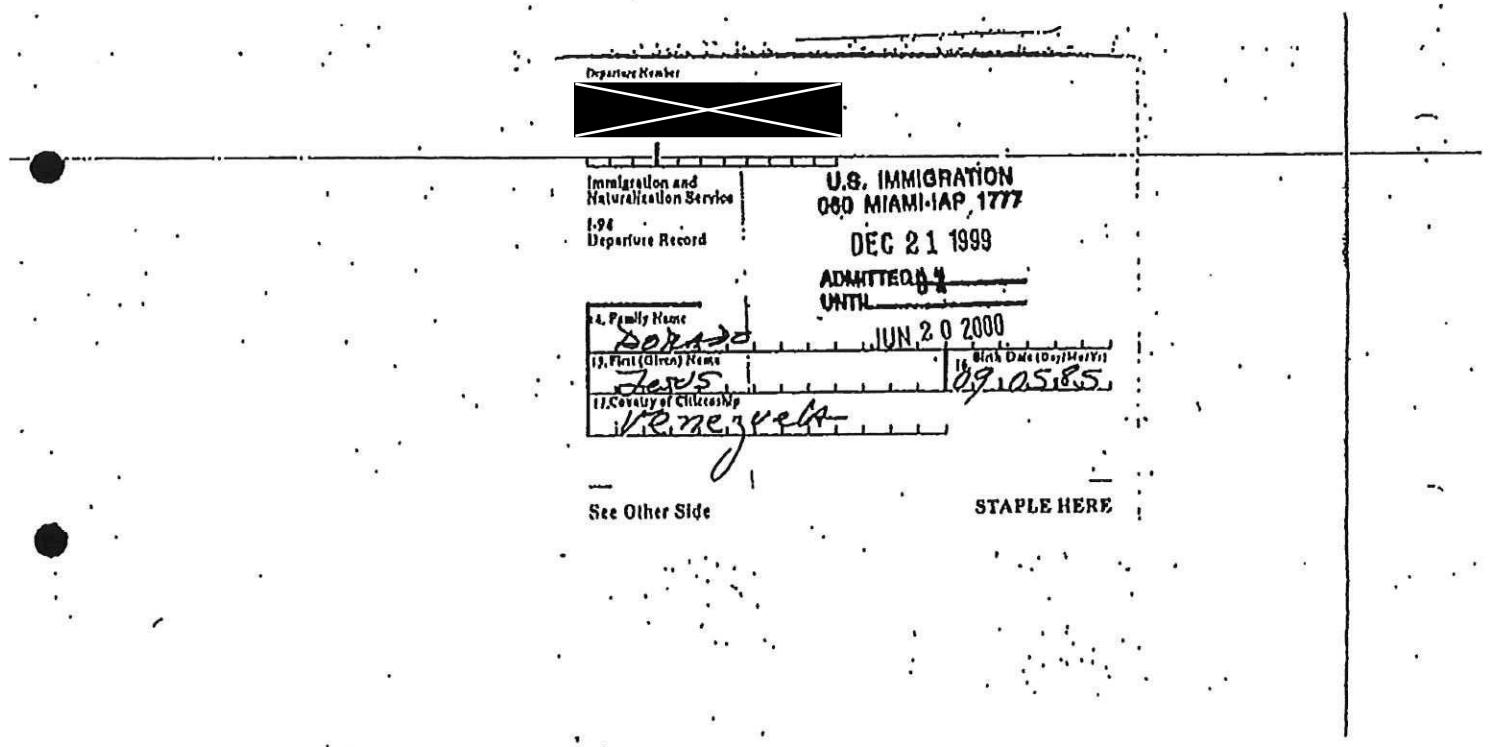
ICE makes no attempt to show it has a plan to lawfully remove Petitioner. ICE has failed to obtain or even allege a country of removal, produce a valid travel document, or provide any timeline for foreseeable removal. Petitioner's detention is clearly without a valid reason with no change in circumstances thus making his detention unlawful and unconstitutional.

Petitioner's unlawful detention has caused unnecessary hardship on Petitioner's U.S. Citizen daughter Rossy A. Dorado, who is currently enlisted in the United States Air Force **(Exhibit 6)**, and Petitioner's Fiancee Marta Ona who has been placed on employment leave under Family and Medical Leave Act (FMLA) from her employment with Memorial Healthcare Systems **(Exhibit 7)**. Petitioner is

Respectfully submitted this 17th day of August 2026

Jesus Manuel Dorado
A [redacted]
Camp East Montana Detention Facility
6920 Digital Road
El Paso, TX 79936
Pro Se Petitioner

EXHIBIT 1


Departure Number
[redacted]
Immigration and Naturalization Service
I-94
Departure Record
U.S. IMMIGRATION
060 MIAMI-IAP, 1777
DEC 21 1999
ADMITTED
UNTIL
JUN 20 2000
4. Family Name
DORADO
13. First (Given) Name
JESUS
14. Birth Date (Day/Mo/Yr)
19 05 85
17. Country of Citizenship
VENEZUELA
See Other Side
STAPLE HERE

CERTIFICATE OF TRANSLATION

I, Brunella Bellemo, hereby certify that the attached documents: DECLARATION OF RENUNCIATION OF VENEZUELAN NATIONALITY OF JESUS MANUEL DORADO CACERES, consisting of three (03) pages is to the best of my knowledge and belief, a true and accurate redemption into the English language of the written in Spanish.

These are authenticated by my initials.

ata # 257596

Brunella Bellemo

Witness my hand under the penalties of perjury this 25 day of November, 2015.

State of Florida
County Miami-Dade

I acknowledge the foregoing instrument on this 25 day of November, 2015 Brunella Bellemo who personally appeared before me at the time of this notarization. He/She is personally known to me and produced a driver's license as identification and he/she did not take an oath.

Notary Public-Marisabel Alvarez de Iriago

MARISABEL ALVAREZ DE ITRIAGO
MY COMMISSION # FF 026318
EXPIRES: August 9, 2017
Bonded Thru Notary Public Underwriters

EXHIBIT 2

CERTIFICATE OF TRANSLATION

I, Brunella Bellemo, hereby certify that the attached documents: EMBASSY OF VENEZUELA RESPONDED LETTER TO JESUS DORADO, consisting of two (02) pages, is to the best of my knowledge and belief, a true and accurate redemption into the English language of the written in Spanish.

These are authenticated by my initials.

II 257596

Brunella Bellemo

Witness my hand under the penalties of perjury this 06 day of May, 2.016.

State of Florida
County Miami-Dade

I acknowledge the foregoing instrument on this 06 day of May, 2016 Brunella Bellemo who personally appeared before me at the time of this notarization. He/She is personally known to me and produced a driver's license as identification and he/she did not take an oath.

Notary Public-Marisabel Alvarez de Ittiago

MARISABEL ALVAREZ DE ITTIAGO
MY COMMISSION # FF 006014
EXPIRES: August 9, 2017
Bonded Thru Notary Public Underwriters

Bolivarian Government of Venezuela | Ministry of Popular Power for Foreign Relations

Embassy of the Bolivarian Republic of Venezuela
Washington, D.C. United states of America

VICTORIOUS PEOPLE

SC/450

Washington D.C., April 22, 2016

Jesus Manuel Dorado
A [redacted]
Stewart Detention Center
P.O. Box 248/146 CCA Road
Lumpkin, GA 31815

Dear Mr. Dorado,

We are pleased to address you in order to acknowledge receipt of your letter dated April 11, 2016, which refers to your voluntary decision concerning your voluntary renouncement to the Venezuelan nationality, and which also, indicates that you own the Cuban citizenship. Furthermore, this Consular Section observes in the referred letter - in your own words - "that US Authorities (ICE) is inducing you to compulsorily recover the Venezuelan nationality."

In this regard, it should be highlighted that, you Mr. Jesus M. Dorado, effectively legally renounced to the Venezuelan nationality, using the right enshrined in our Constitution, specifically in its Article 36 which states that:

> "...*Article 36. You can waive the Venezuelan nationality. He who waives the Venezuelan nationality by birth may recover it if domiciled in the territory of the Republic for a period not less than two years and expresses the willingness to do so. Venezuelans by naturalization who renounce the Venezuelan nationality may regain same fulfilling again the requirements of Article 33 of this Constitution ...*"

However, it is also true that you may recover the Venezuelan nationality, observed in the aforementioned article, which guarantees citizens who renounce the Venezuelan nationality, that they may always recover it provided that they meet the requirements established the Law; having to highlight that when it comes to nationality by birth, this can be recovered as long as you are domiciled in the country for no less than two (2) two years, and you express your willingness to do so without any kind of coercion.

#257596

In this regard, and seen your current condition of a deprived of freedom in the United States of North America, it becomes impossible to materialize the legal requirements established in the Constitution of the Bolivarian Republic of Venezuela for you to recover citizenship, added to the fact that, as has been said, this should be a **VOLUNTARY** decision and never resulting from a coercion that may come either from an individual or any public entity regardless of nationality.

Yours sincerely,

(Document bears wet stamp)

Embassy of the Bolivarian Republic of Venezuela
Before the United States of America

(illegible signature)
JME/jch/jp

#257596

Gobierno Bolivariano de Venezuela | Ministerio del Poder Popular para Relaciones Exteriores | Embajada de la República Bolivariana de Venezuela Washington, DC. Estados Unidos de América. | Pueblo Victorioso

SC/0450

Washington DC., 22 de abril de 2016

Señor
Jesús Manuel Dorado
A[redacted]
Stewart Detention Center
P.O.Box 248 / 146 CCA Road
Lumpkin GA, 31815

Estimado señor Dorado,

Tenemos el gusto de dirigirnos a usted, en la oportunidad de acusar recibo de su carta de fecha 11 de abril de 2016, a través de la cual hace referencia de su decisión voluntaria concerniente a su Renuncia a la Nacionalidad Venezolana, y donde además indica que posee la ciudadanía Cubana. Asimismo, esta Sección Consular observa en la referida carta –según sus propias palabras-, "que las autoridades estadounidenses (*ICE*) lo están induciendo forzosamente a recuperar la nacionalidad Venezolana",

Al respecto, es necesario resaltar que usted Sr. Jesús M. Dorado, efectivamente renunció legalmente a la nacionalidad venezolana, haciendo uso del derecho consagrado en nuestra Carta Magna, específicamente en su artículo 36, el cual establece que:

> *"...Artículo 36. Se puede renunciar a la nacionalidad venezolana. Quien renuncie a la nacionalidad venezolana por nacimiento puede recuperarla si se domicilia en el territorio de la República por un lapso no menor de dos años y manifiesta su voluntad de hacerlo. Los venezolanos y venezolanas por naturalización que renuncien a la nacionalidad venezolana podrán recuperarla cumpliendo nuevamente los requisitos exigidos en el artículo 33 de esta Constitución...".*

Ahora bien, también es cierto que usted podría recuperar la nacionalidad Venezolana, tal y como se observa en el precitado artículo, el cual le garantiza a los ciudadanos que renuncien a la nacionalidad Venezolana, que luego puedan recuperarla siempre y cuando cumplan con los requisitos establecidos en la ley; debiendo resaltar que cuando se trata de nacionalidad por nacimiento, esta podrá recuperarse siempre y cuando se domicilie en el territorio nacional, por un lapso no menor de dos (2) años, y que manifieste usted su voluntad de hacerlo sin ningún tipo de coerción.

/.....

1099 30th Street, N.W., Washington D.C., 20007. Tel: (202) 342-2214/ (202) 627-1444 - Fax: (202) 342-6820
Correo electrónico: embve.uswsh@mppre.gob.ve / Página Web: http://eeuu.embajada.gob.ve

En ese sentido, y visto que su condición actual es la de un privado de libertad en los Estados Unidos de Norte América, se hace imposible la materialización de los presupuestos legales establecidos en la Constitución de la República Bolivariana de Venezuela para que usted recupere la Ciudadanía, aunado al hecho de que tal y como se ha dicho, esta deberá ser una decisión **VOLUNTARIA**, y nunca devenida de la coerción que pueda provenir bien sea de un particular o de algún ente público indistintamente de su nacionalidad .

Valga la presente oportunidad para saludarlo muy atentamente.

Embajada de la República Bolivariana de Venezuela
ante los Estados Unidos de América

JMB/jch/jp

Jesus Manuel Dorado
A [redacted]
Stewart Detention Center
P.O. Box 248 / 146 CCA Road
Lumpkin, GA 31815

Embassy of the United Kingdom
Consular Section
3100 Massachusetts Avenue
Washington, DC 20008

04/18/2016

To Whom It May Concern;

My name is Jesus Manuel Dorado and I am a citizen and national Cuba. I am currently being detained by the United States Immigration and Customs Enforcement in Lumpkin, Georgia. I received a final administrative order of removal from DHS/ICE ordering my removal to Venezuela, but I have not yet been removed. DHS/ICE has been unable to obtain travel documents so that I may be removed to Venezuela. Therefore, I am writing to request travel documents to enter your country and affect my removal from the United States. I would greatly appreciate your assistance in this matter. If you are unable to issue travel documents, please send me a letter stating that to the address above.

Please notify me if there is additional information you need in order to issue travel documents.

Thank you very much for your attention.

Sincerely,

Jesus M. Dorado
04/18/2016

Notary Public

Jesus Manuel Dorado
A[redacted]
Stewart Detention Center
P.O. Box 248 / 146 CCA Road
Lumpkin, GA 31815

Embassy of the Federal Republic of Germany
Consular Section
4645 Reservoir Dr., NW
Washington, DC 20007

04/18/2016

To Whom It May Concern;

My name is Jesus Manuel Dorado and I am a citizen and national Cuba. I am currently being detained by the United States Immigration and Customs Enforcement in Lumpkin, Georgia. I received a final administrative order of removal from DHS/ICE ordering my removal to Venezuela, but I have not yet been removed. DHS/ICE has been unable to obtain travel documents so that I may be removed to Venezuela. Therefore, I am writing to request travel documents to enter your country and affect my removal from the United States. I would greatly appreciate your assistance in this matter. If you are unable to issue travel documents, please send me a letter stating that to the address above.

Please notify me if there is additional information you need in order to issue travel documents.

Thank you very much for your attention.

Sincerely,

Jesus M. Dorado
04/18/2016

Notary Public

Jesus Manuel Dorado
A [redacted]
Stewart Detention Center
P.O. Box 248 / 146 CCA Road
Lumpkin, GA 31815

Royal Netherlands Embassy
Consular Section
4200 Linnean Ave., NW
Washington, DC 20008

04/18/2016

To Whom It May Concern;

My name is Jesus Manuel Dorado and I am a citizen and national Cuba. I am currently being detained by the United States Immigration and Customs Enforcement in Lumpkin, Georgia. I received a final administrative order of removal from DHS/ICE ordering my removal to Venezuela, but I have not yet been removed. DHS/ICE has been unable to obtain travel documents so that I may be removed to Venezuela. Therefore, I am writing to request travel documents to enter your country and affect my removal from the United States. I would greatly appreciate your assistance in this matter. If you are unable to issue travel documents, please send me a letter stating that to the address above.

Please notify me if there is additional information you need in order to issue travel documents.

Thank you very much for your attention.

Sincerely,

Jesus M. Dorado
04/18/2016

Notary Public

Jesus Manuel Dorado
A [redacted]
Stewart Detention Center
P.O. Box 248 / 146 CCA Road
Lumpkin, GA 31815

The Embassy of Switzerland
Consular Section
2900 Cathedral Ave., NW
Washington, DC 20008

04/18/2016

To Whom It May Concern;

My name is Jesus Manuel Dorado and I am a citizen and national Cuba. I am currently being detained by the United States Immigration and Customs Enforcement in Lumpkin, Georgia. I received a final administrative order of removal from DHS/ICE ordering my removal to Venezuela, but I have not yet been removed. DHS/ICE has been unable to obtain travel documents so that I may be removed to Venezuela. Therefore, I am writing to request travel documents to enter your country and affect my removal from the United States. I would greatly appreciate your assistance in this matter. If you are unable to issue travel documents, please send me a letter stating that to the address above.

Please notify me if there is additional information you need in order to issue travel documents.

Thank you very much for your attention.

Sincerely,

Jesus M. Dorado
04/18/2016

Notary Public

Jesus Manuel Dorado
A[redacted]
Stewart Detention Center
P.O. Box 248 / 146 CCA Road
Lumpkin, GA 31815

Embassy of Italy
Consular Section
1601 Fuller St., NW
Washington, DC 20009

04/18/2016

To Whom It May Concern;

My name is Jesus Manuel Dorado and I am a citizen and national Cuba. I am currently being detained by the United States Immigration and Customs Enforcement in Lumpkin, Georgia. I received a final administrative order of removal from DHS/ICE ordering my removal to Venezuela, but I have not yet been removed. DHS/ICE has been unable to obtain travel documents so that I may be removed to Venezuela. Therefore, I am writing to request travel documents to enter your country and affect my removal from the United States. I would greatly appreciate your assistance in this matter. If you are unable to issue travel documents, please send me a letter stating that to the address above.

Please notify me if there is additional information you need in order to issue travel documents.

Thank you very much for your attention.

Sincerely,

Jesus M. Dorado
04/18/2016

Notary Public

Jesus Manuel Dorado
A [redacted]
Stewart Detention Center
P.O. Box 248 / 146 CCA Road
Lumpkin, GA 31815

Embassy of France
Consular Office
4101 Reservoir Rd., NW
Washington, DC 20007-2185

04/18/2016

To Whom It May Concern;

My name is Jesus Manuel Dorado and I am a citizen and national Cuba. I am currently being detained by the United States Immigration and Customs Enforcement in Lumpkin, Georgia. I received a final administrative order of removal from DHS/ICE ordering my removal to Venezuela, but I have not yet been removed. DHS/ICE has been unable to obtain travel documents so that I may be removed to Venezuela. Therefore, I am writing to request travel documents to enter your country and affect my removal from the United States. I would greatly appreciate your assistance in this matter. If you are unable to issue travel documents, please send me a letter stating that to the address above.

Please notify me if there is additional information you need in order to issue travel documents.

Thank you very much for your attention.

Sincerely,

Jesus M. Dorado
04/18/2016

Notary Public

Consulate General
of the Federal Republic of Germany
Atlanta

Mr. Jesus Manuel Dorado
A[redacted]
Stewart Detention Center
P.O. Box 248
Lumpkin, GA 31815

ADDRESS
285 Peachtree Center Avenue NE
Suite 901, Atlanta, GA 30303-1221

INTERNET: www.atlanta.diplo.de

From the desk of
Gerrit Mörking, GM/kf

PHONE: +1 404-659-4760 ext.6425

rk-1@alla.diplo.de

RE **Your Letter to the German Embassy**

File No. (please quote in reply) Rk 516.20 Dorado

May 5, 2016

Dear Mr. Dorado,

With regard to your letter, I have to inform you that according to German law a travel document cannot be issued since you are not a German citizen.

Sincerely

Gerrit Mörking
Consul

EXHIBIT 3

Final Administrative Removal Order

In removal proceedings under section 238(b) of the Immigration and Nationality Act

Event No: [redacted]
FIN: [redacted]
File Number [redacted]
Date April 4, 2016

To: JESUS MANUEL DORADO

Address: [redacted]
(Number, Street, City, State and ZIP Code)

Telephone: [redacted]
(Area Code and Phone Number)

ORDER

Based upon the allegations set forth in the Notice of Intent to Issue a Final Administrative Removal Order and evidence contained in the administrative record, I, the undersigned Deciding Officer of the Department of Homeland Security, make the following findings of fact and conclusions of law. I find that you are not a citizen or national of the United States and that you are not lawfully admitted for permanent residence. I further find that you have a final conviction for an aggravated felony as defined in section 101(a)(43)( ) of the Immigration and Nationality Act (Act) as amended, 8 U.S.C. 1101(a)(43)( ), and are ineligible for any relief from removal that the Secretary of Homeland Security, may grant in an exercise of discretion. I further find that the administrative record established by clear, convincing, and unequivocal evidence that you are deportable as an alien convicted of an aggravated felony pursuant to section 237(a)(2)(A)(iii) of the Act, 8 U.S.C. 1227(a)(2)(A)(iii). By the power and authority vested in the Secretary of Homeland Security, and in me as the Secretary's delegate under the laws of the United States, I find you deportable as charged and order that you be removed from the United States to:

VENEZUELA
or to any alternate country prescribed in section 241 of the Act.

[redacted]
(Signature of Authorized Official)

SDDO
(Title of Official)

4.4.16 SDC
(Date and Office Location)

Certificate of Service

I served this FINAL ADMINISTRATIVE REMOVAL ORDER upon the above named individual.

April 5, 2016 ~~16:00~~ 18:17 Stewart Detention Center, Lumpkin, Ga. In person
(Date, Time, Place and Manner of Service)

[redacted]
DEPORTATION OFFI[redacted]
(Signature and Title of Officer)

Petition for Review
☑ Waive
☐ Accept

Form I-851A (Rev. 08/01/07)

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

ORDER OF SUPERVISION

Event Number: [redacted]

File No. [redacted]

Date: July 7, 2016

Name: DORADO, JESUS MANUEL

On April 4, 2016 (Date of Final Order), you were ordered:

- ☐ Excluded or deported pursuant to proceedings commenced prior to April 1, 1997.
- ☒ Removed pursuant to proceedings commenced on or after April 1, 1997.

Because the agency has not effected your deportation or removal during the period prescribed by law, it is ordered that you be placed under supervision and permitted to be at large under the following conditions:

- ☒ That you appear in person at the time and place specified, upon each and every request of the agency, for identification and for deportation or removal.
- ☒ That upon request of the agency, you appear for medical or psychiatric examination at the expense of the United States Government.
- ☒ That you provide information under oath about your nationality, circumstances, habits, associations and activities and such other information as the agency considers appropriate.
- ☒ That you do not travel outside the State of Florida (Specify geographic limits, if any) for more than 48 hours without first having notified this agency office of the dates and places, and obtaining approval from this agency office of such proposed travel.
- ☒ That you furnish written notice to this agency office of any change of residence or employment 48 hours prior to such change.
- ☒ That you report in person on 07/11/2016 10:30 (Day/Date/Time) to this agency office at:

See I-831
(Reporting Address)

- ☒ That you assist U.S. Immigration and Customs Enforcement in obtaining any necessary travel documents.
- ☐ Other:
- ☐ See attached shee[redacted]pecified conditions (Continue on separate sheet if required)

[redacted]
(Signature of ICE Official)

[redacted]
(Print Name and Title of ICE Official)

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

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

(Signature of ICE Official Serving Order)

(Signature of Alien)

07/07/2016
Date

ICE Detention History Post Final order of Removal

Jesus Manuel Dorado
A[redacted]

- 04/04/2016 - July 7, 2016 = 94 days (Released on OSUP)
- 04/11/2026 - 08/17/2026 and counting = 128+ days
- Total of at least 222 days in ICE detention post Final Order of Removal

EXHIBIT 4

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

NOTICE OF REVOCATION OF RELEASE

Alien Name: Dorado, Jesus A- File #: [redacted]

Your release on the order of supervision (OSUP) issued to you on or about 1/22/2026 (Date OSUP issued (MM/DD/YYYY)) is hereby revoked. You will remain detained in U.S. Immigration and Customs Enforcement (ICE) custody at this time.

☐ Your release has been revoked pursuant to 8 C.F.R. § 241.4(l), for the following reason(s):

☐ The purposes of release have been served.

☐ You violated a condition of your release. Specifically, you:

(Information about how condition of release violated)

☐ It is appropriate to enforce the removal order entered against you as ICE has the ability and means to effectuate your removal.

☐ ICE has obtained a travel document and scheduled your removal to take place no later than:

Date (MM/DD/YYYY)

☐ ICE is seeking a travel document to effect your expeditious removal to _____ (Country of Removal)

☐ On _____ (Date (MM/DD/YYYY)), you were ordered removed to _____ (Country), but you were granted withholding of removal to N/A (Country). Your case is under review for removal to an alternate country.

☐ Your conduct, or other circumstance, indicates that release is no longer appropriate. Specifically, you:

(Information about why release no longer appropriate)

OR

☒ Your release has been revoked pursuant to 8 C.F.R. § 241.13(i), for the following reason(s):

☐ You violated a condition of your release. Specifically, you:

(Information about how condition of release violated)

☒ Circumstances have changed such that there is a significant likelihood of removal in the reasonably foreseeable future.

☐ ICE has obtained a travel document and scheduled your removal to take place no later than:

Date (MM/DD/YYYY)

☒ ICE is seeking a travel document to effect your expeditious removal to _____
Country of Removal

☐ On _____, you were ordered removed to _____, but you
Date (MM/DD/YYYY) Country

were granted withholding of removal to _____. Your case is under review
Country

for removal to an alternate country.

Notice of Informal Interview

On 04/11/2026, you will be afforded an informal interview at which you will be given an opportunity to respond to the reasons for this revocation. You may submit any evidence or information you wish to be reviewed in support of your release.

Penalties for Failure to Comply with Order of Removal

You are advised that you must demonstrate that you are making reasonable efforts to comply with the order of removal and that you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to affect your removal. You are also advised that any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 U.S.C. § 1253(a) and civil penalties under 8 U.S.C. § 1324d.

_____ 04/11/2026
Signature of Authorized Official Date (MM/DD/YYYY)

Jose Cora
Name of Authorized Official

Acting Supervisory Detention and Deportation
Title of Authorized Official

(Note: 8 C.F.R. § 241.4 revocation must be EAD or FOD where there is a public interest to do so and referral to EAD not reasonable; 241.13 may be by RMD)

PROOF OF SERVICE

(1) Personal Service

(a) I C. Jacob, D.O,
Name of ICE Officer Title

certify that I served Dorado, Jesus with a copy of this document at
Name of detainee

[redacted] on 4/11/2026, at 1330.
Institution Date (MM/DD/YYYY) Time

REFUSED TO SIGN 04/11/2026
Detainee Signature Date (MM/DD/YYYY)

☐ cc: Attorney of Record or Designated Representative

☐ cc: A-File

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

NOTICE OF REVOCATION OF RELEASE

Alien Name: Dorado, Jesus A-[redacted]

Your release on the order of supervision (OSUP) issued to you on or about 07/07/2016 (Date OSUP Issued (MM/DD/YYYY)) is hereby revoked. You will remain detained in U.S. Immigration and Customs Enforcement (ICE) custody at this time.

☐ Your release has been revoked pursuant to 8 C.F.R. § 241.4(l), for the following reason(s):

☐ The purposes of release have been served.

☐ You violated a condition of your release. Specifically, you:

(Information about how condition of release violated)

☐ It is appropriate to enforce the removal order entered against you as ICE has the ability and means to effectuate your removal.

☐ ICE has obtained a travel document and scheduled your removal to take place no later than:

Date (MM/DD/YYYY)

☐ ICE is seeking a travel document to effect your expeditious removal to Country of Removal

☐ On Date (MM/DD/YYYY), you were ordered removed to Country, but you were granted withholding of removal to N A Country. Your case is under review for removal to an alternate country.

☐ Your conduct, or other circumstance, indicates that release is no longer appropriate. Specifically, you:

(Information about why release no longer appropriate)

OR

☒ Your release has been revoked pursuant to 8 C.F.R. § 241.13(i), for the following reason(s):

☐ You violated a condition of your release. Specifically, you:

(Information about how condition of release violated)

☒ Circumstances have changed such that there is a significant likelihood of removal in the reasonably foreseeable future.

☐ ICE has obtained a travel document and scheduled your removal to take place no later than:

Date (MM/DD/YYYY)

☒ ICE is seeking a travel document to effect your expeditious removal to Venezuela (Country of Removal)

☐ On _____ (Date (MM/DD/YYYY)), you were ordered removed to _____ (Country), but you were granted withholding of removal to _____ (Country). Your case is under review for removal to an alternate country.

Notice of Informal Interview

On 04/11/2026 (Date (MM/DD/YYYY)), you will be afforded an informal interview at which you will be given an opportunity to respond to the reasons for this revocation. You may submit any evidence or information you wish to be reviewed in support of your release.

Penalties for Failure to Comply with Order of Removal

You are advised that you must demonstrate that you are making reasonable efforts to comply with the order of removal and that you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to affect your removal. You are also advised that any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 U.S.C. § 1253(a) and civil penalties under 8 U.S.C. § 1324d.

[redacted] _____ 04/11/2026 (Date (MM/DD/YYYY))

_____

Name of Authorized Official

Acting Supervisory Detention and Deportation

Title of Authorized Official

(Note: 8 C.F.R. § 241.4 revocation must be EAD or FOD where there is a public interest to do so and referral to EAD not reasonable; 241.13 may be by RMD)

PROOF OF SERVICE

(1) Personal Service

(a) I [redacted] (Name of ICE Officer), D.O (Title), certify that I served Dorado, Jesus (Name of detainee) with a copy of this document at [redacted] (Institution) on 4/11/2026 (Date (MM/DD/YYYY)), at 1330 (Time).

REFUSED TO SIGN

Detainee Signature

04/11/2026 (Date (MM/DD/YYYY))

☐ cc: Attorney of Record or Designated Representative

☐ cc: A-File

EXHIBIT 5

ALIEN INFORMAL INTERVIEW

UPON REVOCATION OF ORDER OF SUPERVISION UNDER

8 C.F.R. § 241.4(l); 8 C.F.R. § 241.13(i)

STATEMENT OF Dorado, Jesus M [Detainee]

A File # [redacted]

Detention Location FLORIDA SOFT-SIDED FACILITY -SOUTH

INTERVIEWING ICE OFFICER: Garcia IC DO FSSFS
[Print Name, Title & Duty Station]

On 5/12/26, I conducted an initial informal interview of the detainee listed above in order to afford the alien an opportunity to respond to the reasons for revocation of his or her order of supervision stated in the notification letter. At the interview, the alien made the following oral response regarding the reasons for revocation: NO STATEMENT PROVIDED

The detainee [did] [did not] provide a written statement. The detainee [did] [did not] provide any documents. Any documents provided are attached.

X Refused to sign
Signature of Interviewing Officer

FOR INTERNAL USE ONLY

EXHIBIT 6

DEPARTMENT OF THE AIR FORCE
937TH TRAINING GROUP
JOINT BASE SAN ANTONIO-FORT SAM HOUSTON

June 18, 2026

MEMORANDUM FOR AB DORADO ROSSY A.

FROM: SSGT CRESPO RODRIGUEZ, GABRIELA

SUBJECT: Letter of Appreciation

1. During your time in technical training at JBSA Ft. Sam Houston you chose to challenge yourself and grow yourself not only for your benefit but for the benefit of those around you; peers and subordinates alike. After meeting the challenges and overcoming the requirements of becoming a Physical Training Leader, you continued to exemplify Service Before Self and Excellence in All We Do with your academics as well as, with your dedication in honing the skills needed in becoming an effective leader. Your willingness to see a need, and then voluntarily step out to fill that need, is exactly the type of Airman our Air Force needs. It truly has been a pleasure to watch you grow into more of the Airman, and Leader, we know you are capable of being; bold, humble, and driven.

2. Thank you for the time, effort, and growth that you leave with your peers and the PTL Program. Continue searching for those needs and being an example for your peers to emulate. I truly believe that our Air Force culture is what we allow to happen around us every day. Be the change you want to see and seek ways to motivate others to do the same. As stated in our Airman's Creed, you are a warrior and now, your nation's call is to go out making our Air Force better than you found it.

CRESPO RODRIGUEZ.GABRIELA [redacted] Digitally signed by CRESPO RODRIGUEZ.GABRIELA. [redacted] Date: 2026.06.18 12:49:50 -05'00'

GABRIELA CRESPO RODRIGUEZ, SSGT, USAF
Military Training Leader, 382 TRS

EXHIBIT 7

EXHIBIT 8

Christ Journey CHURCH

11 May 2026

To Whom It May Concern,

I am writing as a pastor of Christ Journey Church in support of Jesus Dorado, who has been a meaningful part of our church community at the Coral Gables campus since the fall of 2020. Originally from Cuba, Jesus moved to the United States when he was just seven years old and has built his life, family, and work here in Miami. In June 2022, he made the meaningful decision to place his faith in Jesus Christ, and since then, we have seen his life, character, marriage, and fatherhood shaped by God's Word and the virtues of the Christian faith. Jesus has given faithfully and consistently each month since April 2023, including generous support toward the mission and ministry of Christ Journey Church.

His wife has also shared how much she has seen his dedication as a father, including having their daughter Rossy baptized at Christ Journey and enrolling her in Christ Journey summer camp. Together, Jesus and his wife have operated an HVAC company in Miami for seven years, and his life reflects the care, responsibility, and moral character of a deeply committed Christian man. Jesus is a regular attender whose presence among us has reflected humility, sincerity, generosity, and a desire to follow Christ with integrity. I respectfully submit this letter as a pastoral character reference and ask that his faith, family commitment, church involvement, and demonstrated contribution to our community be given serious consideration.

Sincerely,

Ryan N. Reed

Rev. Dr. Ryan N. Reed
Executive Pastor
Christ Journey Church

Emergency Petition for a Writ of Habeas Corpus