JUDGE LEON SCHYDLOWER

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WESTERN DISTRICT OF TEXAS
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Petition for a Writ Of Habeas Corpus Under 28 U.S.C. § 2241 (pro-se)

FILED
August 31, 2026
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY: Elizabeth Y. Martinez
DEPUTY

UNITED STATES DISTRICT COURT

FOR THE WESTERN DISTRICT

OF TEXAS DIVISION

EL PASO

EP26CV2242

COUNTRY: VENEZUELA

A#: [redacted]

PETITIONER: ***George Daniel Ramirez***

MARY DE ANDA-YBARRA, *Field Office Director of Enforcement and Removal Operations El Paso Field Office, Immigration and Customs Enforcement;*

WARDEN OF DE ERO, EL PASO PROCESSION

TODD M. LYONS, *In His Official Capacity as Acting Director, Immigration and Customs Enforcement, U.S Department of Homeland Security;*

MARK WAYNE MULLIN, *His Official Capacity as Secretary , U.S Department of Homeland Security;*

ANDANTE BLANCHE, *In His Official as Acting Attorney General of the United States,*

Respondents.

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

PETITION FOR A WRIT

OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

George Daniel Ramirez.

Introduction

*-I, **George Daniel Ramirez**, born in **Venezuela**. I had to run away from my country for the following reasons: it is not a secret to nobody that **Venezuela** lives under a dictatorial regime. Which oppress the citizenry and the human rights are systematically violated in several ways, people does not have expression liberty in any way. And I am one of many people from **Venezuela** that are not agreed with the dictatorial system, therefore I have been forced to abandon my country, my land and my family*

*-Get out to look for my freedom was not easy, because I had to endure a very hard and dangerous journey. I had to cross through **Colombia, Panama, Costa Rica, Nicaragua Honduras. Guatemala** and **Mexico**. In **Mexico** the danger was more intense because I had to pay a big amount of money to avoid to be kidnapped by the cartels and being able to come to US preserving my physical integrity and my health.*

*-On October **4th of 2022** I had the blessing of reach the border with the United States through the border port of El Paso TX where I have been admitted and processed by the border patrol and immigration officers. Once I was released I received a parole **212-(d) (5)**, which is a legal permission to stay and transit around the country. I submited all my paperwork before the first year of my arrival to the country I and work permit was granted to me as well a drivers license, SSN and further I applied for my political asylum. I am a very hard worker man that has dedicated to help my family specially my*

son. I am a man with a good moral character due that I never had any kind of criminal record.

*-I was detained by **ICE officers** when I was accomplishing with the appearance on my scheduled dates with my immigration officer and there was when they told me that I had to be detained once again. From there I was transferred to an immigration detention center in the state of Texas, called Camp East Montana and from there I was moved again to another detention center in Arizona and after moved again to **EPC 8915 Montana Ave. El Paso TX 79925**, in am currently detained in this center, for all these centers I have been I have suffered multiple ways of discrimination by the hand of the officers just for being an immigrant. The food is not good enough for the health of the detainees, we are verbally and physically abused, I have been treated that I feel are not fair for a person. I want to tell you that I have more than **10 months** detained by **ICE** and I feel that my rights has been violated*

-I hope you can take in consideration my declaration and let me wait the decision over my case, from my home and that I am not a flight risk because I never missed any immigration date and either a court, I am not a danger to the community because I don't have a criminal o violent background. Thank you for reading my declaration and God bless you.

God bless America

D

JURISDICTION.

JURISDICTION

-This case arises under the Constitution of the United States, the Immigration and Nationality Act ("INA"), 8 U.S.C. §§ 1101, et seq., and the Administrative Procedures Act ("APA"), 5 U.S.C. § 701, et seq.

-This Court has subject matter jurisdiction over this petition and may grant relied pursuant to 28 U.S.C. §§ 2241, 28 U.S.C. § 1331; Article I, § 9, cl. 2 of the United States Constitution (the Suspension Clause); the All-Writs Act, 28 U.S.C. § 1651; the Administrative Procedure Act, 5 U.S.C § 701; and for injunctive relief pursuant to the Declaratory Judgment Act, 28 U.S.C. § 2201.

-Pursuant to 28 U.S.C. § 2241, district courts have jurisdiction to hear habeas petitions by noncitizens who challenge the lawfulness of their detention under federal law. Zadvydas v. Davis, 533 U.S. 678, 687 (2001); Jennings v. Rodriguez, 583 U.S. 281, 292-95 (2018); Maldonado v. Macias, 150 F. Supp. 3D 788, 794 (W.D. Tex. 2015), INS v. St. Cyr; 533 U.S. 289, 364-65 (2001) ("The writ of habeas corpus has always been available to review the legality of executive detention.").

*-Importantly for jurisdictional questions, Petitioner is not asking this court to review an order of removal, nor, indeed, for any relief having to do with this current proceedings in immigration court. Petitioner seeks only habeas relief from his current, illegal detention in the way he was arrested, while those immigration proceedings are ongoing, and for this Court to determine as a matter of law that he is entitled to be released or granted a 5.bond hearing before a neutral arbiter. See also, Lopez-Arevelo v. Ripa, No. Ep-25-CV-337-KC at 1-2, 2025 U.S. dist. LEXIS 188232, at *14-15 (W.D. Tex. Sep. 21, 2025) (stating in part that 8 U.S.C. § 1252(a)(5), §1252(g), and §1226(e) do not deprive a.*

-Habeas Court of jurisdiction when a Petitioner is challenging his detention under his right to procedural due process). "[T]he [REAL ID] Act does not, however, preclude habeas review of challenges to detention that are independent of challenges to removal orders." Gutierrez-Soto v. Sessions, 317 F. Supp. 3d 917, 925 (W.D. Tex. 2018).
The Respondents' continued detention of Petitoner constitutes such a "severe restraint on his individual liberty," that he is "in custody in violation of the ... laws ... of the United States." See Hensley v. Municipal Court, 411 U.S. 345, 351 (1973); 28 U.S.C. § 2241; see also Henderson v. Reno, 157 F.3d 106, 122 (2d Cir. 1999), cert. Denied sub nom. Reno v. Navas, 119 S. Ct. 1141 (1999).

III. EXHAUSTION OF REMEDIES

- As recognized by the Fifth Circuit, while exhaustion is the general rule, "exceptions to this general rule" exist. Garner v. U.S. Dep't of Lab., 221 F.3d 822, 825(5th Cir. 2000). "A failure to exhaust administrative remedies may be excused when the claimant advances a constitutional challenge unsuitable for determination in an administrative proceeding, or when the unexhausted remedy is plainly inadequate."
*"When a petitioner's due process claim does not assert a procedural error correctable by the BIA, it is not subject to an exhaustion requirement." Lopez de Jesus v. Imm.& Naturalization Serv., 312 F.3d 155, 162 n. 47(5th Cir. 2002). Federal courts have "the discretion to excuse the exhaustion requirement" Garner, 221 F.3d at 825. Here, the "constitutional challenges are not the types of questions" requiring exhaustion, and requiring Petitioner "to exhaust administrative remedies relating to same would be an exercise in futility." Exhaustion, furthermore, may also be excused when delay would result in hardship. See Shalala v. III. Council on Long Term Care, Inc., 529 U.S. 1, 13, 120 S. Ct. 1084, 146 L. Ed. 2D 1 (2000) [*6].*

*-Exhaustion is not required where the administrative remedy is inadequate due to agency bias. Numerous courts have recognized the bias inherent in the ICE custody review process. See Phan v. Reno, 56 F. Supp. 2d 1149, 1157 (W.D. Wash.1999) ("We have...concerns about the quality of the review afforded by INS to the Petitioners. Indeed, our review of the record confirms that INS does not meaningfully and impartially review the Petitioners' custody status."); Rivera v. Demore, No. C 99-3042 THE, 1999 WL 521177, *7 (N.D. Cal. Jul. 13, 1999) (procedural due process requires that alien release determination be made by impartial adjudicator due to agency bias); Ekekhor v. Aljets, 979 F. Supp. 640, 644 (N.D. Ill. 1997); St. John v. McElroy, 917 F. Supp. 243, 251 (S.D.N.Y. 1996) ("Due to political and community pressure, INS, an executive agency, has every incentive to continue to detain aliens with aggravated felony convictions, even though they have served their sentences, on the suspicion that they may continue to pose a danger to the community."*

IV. VENUE

-Pursuant to Braden v. 30 th Judicial Circuit Court of Kentucky, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Western District Court of Texas, the judicial district in which Petitioner resides.

V. LEGAL FRAMEWORK

*-Habeas petitioners must show they are "in custody in violaton of the constitution or laws or treaties of the United States." Herrera v. Tate, F. Supp. 3D, No. CVH-25-3364, 2025 U.S. Pist. LEXIS 189999, 2025 WL 2774610, at *4 (S.D. Tex. Sept. 26, 2025) (quoting 28 U.S.C. § 2241(c)(3)). They "bear the burden of proving that [they are] being*

held contrary to law; and because the habeas proceeding is civil in nature, the petitioner must satisfy this burden of proof by a preponderance of the evidence." (quoting Skaftouros v. United States, 667 F.3d 144, 158(2d Cir. 2011) and citing Bruce v. Estelle, 536 F.2d 1051, 1058 (5th Cir. 1976)). Courts "considering a habeas petition must 'determine the facts and dispose of the matter as law and justice require.'" (quoting 28 U.S.C. § 2243).

- The Supreme Court has referred to the "Great Writ" as "perhaps the most important writ known to the constitutional law of England, affording as it does a swift and imperative remedy in cases of illegal restraint or confinement" and "received into out own law in the colonial period." Fay v. Noia, 372 U.S. 391, 400, 83 S. Ct. 822, 9 L. Ed. 2D 837 (1963), overruled in part on other grounds, Wainwright v. Sykes, 433 U.S. 72, 97 S. Ct. 2497, 53 L. Ed. 2D 594 (1977), and abrogated in part on other grounds by Coleman v. Thompson, 501 U.S. 722, 111 S. Ct. 2546, 115 L. Ed. 2D 640 (1991). The importance of this Great Writ was not lost on the Justices of the Civil Rights era who recognized that the writ's

*function has been to provide a prompt and efficacious remedy for whatever society deems to be intolerable restraints. Its root principle is that in a civilized society, government must always be accountable to the judiciary for a man's imprisonment: if the imprisonment cannot be shown to conform with the fundamental requirements of law, the individual is entitled to his immediate release. Thus there is nothing novel in the fact that today habeas corpus in the federal [*7] courts provides a mode for the redress of denials of due process of law, vindication of due process is precisely its historic office.*

-"Only in the rarest of circumstances has congress seen fit to suspend the writ." Hamdi v. Rumsfeld, 542 U.S. 507, 525, 124 S. Ct. 2633, 159 L. Ed. 2D 578 (2004). "absent suspension, the Writ of Habeas Corpus remains available to every individual detained within the United States." (citing U.S. const., Art. I, § 9. Cl. 2 ("The privilege of the Writ of Habeas Corpus shall not be suspended, unless when in cases of Rebellion or Invasion the Public safety may require it")). Indeed, absent suspension, it is available to "challenge the legality of their detention" by "noncitizens detained by our Government in territory over which another country maintians de Jure Sovereignty," such as Guantanamo Bay. Boumediene v. Bush, 553 U.S. 723, 770, 128 S. Ct. 2229, 171 L. Ed. 2D 41 (2008). The Great Writ remains "a critical check on the Executive, ensuring that it does not detain individuals except in accordance with law." Hamdi, 542 U.S. at 525 (citing Imm. & Naturalization Serv. v. St. Cyr; 533 U.S. 289, 301, 121 S. Ct. 2271, 150 L. Ed. 2D 347 (2001), superseded by statute on other grounds as stated in Nasrallah v. Barr; 590 U.S. 573, 580, 140 S. Ct. 1683, 207 L. Ed 111 (2020)).

The fundamental protection of habeas corpus applies to immigration-related detention. See Zadvydas v. Davis, 533 U.S. 678, 687, 121 S. Ct. 2491, 150 L. Ed. 2D 653 (2001). The Supreme Court in Zadvydas noted: It is well established that certain constitutional protections available to persons inside the United States are unavailable to aliens outside of our geographic borders. But once an alien enters the country, the legal circumstance changes, for the Due Process Clause applies to all "persons" within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.

VI First Cause of Action

-In Zadvydas, the U.S. Supreme Court found that six months is a presumptively reasonable period during which ICE may detain aliens in order to effectuate their removal. Id. at 702. "Once the alien provides good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future, the Government must respond with evidence sufficient to rebut that showing." Id. at 701. In Clark v. Martinez, 543 U.S. 371 (2005), the Supreme Court held that its ruling in Zadvydas applies equally to inadmissible aliens. Id. at 386. Therefore, detention under § 1225(b)(2)(A) is subject to a reasonable time limitation. Maldonado, 150 F. Supp. 3d at 805. The Due Process Clause of the Fifth Amendment requires that any deprivation of Petitioner's liberty be narrowly tailored to serve a compelling government interest. Although ICE has an interest in detaining Petitioner to effectuate his removal, it can do

-Petitioner's Detention Violates the Administrative Procedures Act, 5 U.S.C. § 706(2).Petitioner's detention violates the INA and its regulations, pending his asylum Application, he has established that he is eligible to adjust his status to that of a Legal Permanent Resident; meanwhile, the Respondents have utterly failed to provided him with any meaningful opportunity to present argument or evidence in favor of his release, nor did they make any individualized determination that he poses a flight risk or danger. Rather; Petitioner's prolonged detention appears to be impermissible based on general mandates within the agency rather than the individual judgment of ICE officers on the ground.

VII. Second Cause Of Action

-Under the Immigration and Nationality Act ("INA") § 287(a)(2) only allows immigration officials to make a warrantless arrest if they have "reason to believe" that the person is likely to escape before a warrant could be obtained. See De La Paz v. Coy, 786 F.3d 367, 376 (5th Cir. Tex. 2015) (stating that an "arrest shall be made by ICE Agents only when the designated immigration officer has reason to believe that the person to be arrested has committed an offense against the United States or is an alien illegally in the United States.")

- The De La Paz Court further stated ... "even if an agent has reasonable belief, before making an arrest, there must also be 'a likelihood of the person escaping before a warrant can be obtained for his arrest'", citing to 8 U.S.C. § 1357(a)(2)(5). Reasonable suspicion for an immigration stop cannot be based "on broad profiles which cast suspicion on entire categories of people without any individualized suspicion of the particular person to be stopped." United States v. Rodriguez Sanchez, 23 F.3d 1488, 1492 (9th Cir. 1994). Rather, reasonable suspicion must be "particularized and objective," United States v. Arvizu, 534 U.S. 266, 273 (2002).

VIII. Third Cause Of Action

-The Supreme Court has recognized that the Fourth Amendment is violated by prolonged detention solely for the purpose of investigating immigration status. See Arizona v. United States, 132 S. Ct. 2492, 2509 (2012) (stating that "Detaining individuals solely to verify their immigration status would raise constitutional concerns.")

- In Zadvydas, the U.S. Supreme Court found that six months is a presumptively reasonable period during which ICE may detain aliens in order to effectuate their removal. Id. at 702. "Once the alien provides good reason to believe that there is no

significant likelihood of removal in the reasonably foreseeable future, the Government must respond with evidence sufficient to rebut that showing." Id. at 701. In Clark v. Martinez, 543 U.S. 371 (2005), the Supreme Court held that its ruling in Zadvydas applies equally to inadmissible aliens. Id. at 386. Therefore, detention under § 1225(b)(2)(A) is subject to a reasonable time limitation. Maldonado, 150 F. Supp. 3d at 805. The Due Process Clause of the Fifth Amendment requires that any deprivation of Petitioner's liberty be narrowly tailored to serve a compelling government interest. Although ICE has an interest in detaining Petitioner to effectuate his removal, it can do so in an unconstitutional manner. Gutierrez-Soto v. Sessions, at 925. As such, Petitioner's mandatory detention is unreasonable. Maldonado held that an individualized bond hearing was the appropriate remedy in such a case to provide a safeguard against indefinite detention. Id. at 812. Respondents have exceeded their authority to detain Petitioner, and an individualized bond hearing before a neutral adjudicator is justified on the facts of this case.

-{196 L. Ed. 2d 490}{137 S. Ct. 472} The parties are directed to file supplemental briefs addressing {196 L. Ed. 2d 491} the following questions: 1) Whether the Constitution requires that aliens seeking admission to the United States who are subject to mandatory detention under 8 U.S.C. § 1225(b) must be afforded bond hearings, with the possibility of release into the United States, if detention lasts six months. 2) Whether the Constitution requires that criminal or terrorist aliens who are subject to mandatory detention under Section 1226(c) must be afforded bond hearings, with the possibility of release, if detention lasts six months. 3) Whether the Constitution requires that, in bond hearings for aliens detained for six months under Sections 1225(b), 1226(c), or 1226(a), the alien is entitled to release unless the government demonstrates by clear and convincing evidence that the alien is a flight risk or a danger to the community, whether the length of the alien's detention must be weighed in favor of release, and whether new bond hearings must be afforded automatically every six months. The briefs are to be filed simultaneously with the Clerk and served upon opposing counsel on or before 2 p.m., Tuesday, January 17, 2017. Amicus{2016 U.S. LEXIS 2} briefs may be filed with the Clerk and served upon counsel on or before 2 p.m., Friday, January 27, 2017. Reply briefs are to be filed simultaneously with the Clerk and served upon opposing counsel on or before 2 p.m., Monday, February 6, 2017. The word limits and cover colors for the briefs should correspond to the provisions of Rule 33.1(g) pertaining to briefs on the merits rather than to the provision pertaining to supplemental briefs.

-{155 L. Ed. 2d 729} Under the Immigration and Nationality Act, 8 U.S.C. § 1226(c) [8 USCS § 1226(c)], "the Attorney General shall take into custody any alien who" is removable from this country because he has been convicted of one of a specified set of crimes, including an "aggravated felony." After respondent, a lawful permanent resident alien, was convicted in state court of first-degree burglary and, later, of "petty theft with priors," the Immigration and Naturalization Service (INS) charged him with being deportable from the United States in light of these convictions, and detained him pending his removal hearing. Without disputing the validity of his convictions or the INS' conclusion that he is deportable{2003 U.S. LEXIS 2} and therefore subject to mandatory detention under § 1226(c), respondent filed a habeas corpus action challenging § 1226(c) on the ground that his detention thereunder violated due process because the INS had made no determination that he posed either a danger to society or a flight risk. The District Court agreed and granted respondent's petition subject to the INS' prompt undertaking of an individualized bond hearing, after which respondent was released on bond. In affirming, the Ninth Circuit held that § 1226(c) violates substantive due process

as applied to respondent because he is a lawful permanent resident, the most favored category of aliens. The court rejected the Government's two principal justifications for mandatory detention under § 1226(c), discounting the first--ensuring the presence of criminal aliens at their removal proceedings--upon finding that not all aliens detained pursuant to § 1226(c) would ultimately be deported, and discounting the second--protecting the public from dangerous criminal aliens--on the grounds that the aggravated felony classification triggering respondent's detention included crimes (such as respondent's) that the court did not{2003 U.S. LEXIS 3} consider "egregious" or otherwise sufficiently dangerous to the public to {155 L. Ed. 2d 730} necessitate mandatory detention. Relying on Zadvydas v. Davis, 533 U.S. 678, 150 L. Ed. 2d 653, 121 S. Ct. 2491, the court concluded that the INS had not provided a justification for no-bail civil detention sufficient to overcome a permanent resident alien's liberty interest.

- Section 1226(e) --which states that "the Attorney General's discretionary judgment regarding the application of this section shall not be subject to review" and that "[n]o court may set aside any action or decision by the Attorney General under this section regarding the detention or release of any alien"--does not deprive the federal courts of jurisdiction to grant habeas relief to aliens challenging their detention under § 1226(c). Respondent does not challenge a "discretionary judgment" by the Attorney General or a "decision" that the Attorney General has made regarding his detention or release. Rather, respondent challenges the statutory framework that permits his detention without bail. Where Congress intends to preclude judicial review of constitutional claims its intent to do so must be clear. E.g., Webster v. Doe, 486 U.S. 592, 603, 100 L. Ed. 2d 632, 108 S. Ct. 2047.{2003 U.S. LEXIS 4} And, where a provision precluding review is claimed to bar habeas review, the Court requires a particularly clear statement that such is Congress' intent. See INS v. St. Cyr, 533 U.S. 289, 308-309, 298, 327, 150 L. Ed. 2d 347, 121 S. Ct. 2271. Section 1226(e) contains no explicit provision barring habeas review.

-The District Court agreed with respondent that § 1226(c)'s requirement of mandatory detention for certain criminal aliens was unconstitutional. Kim v Schiltgen{2003 U.S. LEXIS 10} , No. C 99-2257 SI {538 U.S. 515} (Aug. 11, 1999), App. to Pet. for Cert. 31a-51a. The District Court therefore granted respondent's petition subject to the INS' prompt undertaking of an individualized bond hearing to determine whether respondent posed either a flight risk or a danger to the community. Id., at 50a.

GROUND TWO:

I invoke the Accardi doctrine:

-(a) Supporting facts

an agency has to follow its own rules and regulations. see united states ex rel. Accardi vs Shaughnassy,347 U.S 260(1954).ICE skipped its own procedural steps required by its own rule book before revoking my liberty. see Robbie vs Bondi, 803f.supp 3d 766,767,774(D.MINN.2025) agency deviation from its own regulations may justify relief in a case otherwise properly before the court. jean vs Nelson 727f2D,957,976(11CIRC.1984)

-Under the Accardi doctrine, "an administrative agency is required to adhere to its own internal operating procedures." Church of Scientology of Cal. v. United States, 920 F.2d 1481, 1487 (9th Cir. 1990) (citing United States ex rel. Accardi v. Shaughnessy, 347 U.S. 260, 268, 74 S. Ct. 499, 98 L. Ed. 681 (1954)). In accordance with this principle, agencies must follow a regulation if they promulgate one

*-To establish an APA claim under the Accardi doctrine, Martinez must show both that (1) the Government violated its own regulations, and (2) Martinez suffer substantial prejudice as a result of that violation. See Al Otro Lado, Inc. v. Mayorkas, 2024 U.S. Dist. LEXIS 179081, 2024 WL 4370577, at *8-9 (S.D. Cal. Sept. 30, 2024).*

GROUND THREE:

this court has jurisdiction under section 28 u.s.c § 2241 the suspension clause U.S const.art I§9,CL.

(a) Supporting facts (Be brief. Do not cite cases or law.
The district court agreed with respondent that §1226(c)'s requirement of mandatory detention for certain criminal alien was unconstitutional. Kim V Schiltgen {2003u.s.515} (Aug.11.1999),app. to pet. for cert.31a-51a.the district court therefore granted respondents petition subject to the INS' prompt undertaking of an individualized bond hearing to determine whether respondent posed either risk or a danger to the community. id.,at50a.

GROUND FOUR:

-the government has striped me of my liberty without affording me adequate notice or opportunity to be heard. government violate and continues to violate the"great and blessed U. S. Const. fifth amendment".

(a) Supporting facts (Be brief. Do not cite cases or law.
The fifth amendment prohibits deprivation of an individual's liberty without due process of law. U.S constitution see Harper 520 us 143,147-4801997.see romeo vs ladwig non citizen's have an overwhelming liberty interest that cannot be taken away without due process.

Motion Against Transfer

Detainee: ***George Daniel Ramirez***
A-Number: [redacted]
Current Detention Center: ***8915 MONTANA AVE EL PASO TX.***
To Whom it may Concern:
I hereby submit a formal request to remain at my current detention center and to avoid any transfer to another facility.

Background

I am currently detained in the custody of Immigration and Customs Enforcement (ICE) while my immigration proceedings are active, including a pending appeal before the Board of Immigration Appeals (BIA).

Grounds for the request

My transfer to another jurisdiction or detention center could substantially affect my access to case documentation and my ability to communicate with my family members and potential legal resources. Any relocation could cause unnecessary delays in my immigration proceedings and hinder the proper exercise of my due process rights.

Petition

Based on the foregoing, I respectfully request:
To remain at my current detention center.
To avoid any transfer to another detention center.
That the negative impact impact a transfer would have on the continuity of my immigration proceedings be taken into consideration.

IX. Fourth Cause Of Action

-Immigration detention is a form of civil confinement that "constitutes a significant deprivation of liberty that requires due process protection." Addington v. Texas, 441 U.S. 418, 4253 (1979).

-The Supreme Court has recognized that the Fourth Amendment is violated by prolonged detention solely for the purpose of investigating immigration status. See Arizona v. United States, 132 S. Ct. 2492, 2509 (2012) (stating that "Detaining individuals solely to verify their immigration status would raise constitutional concerns.")

-Under the Immigration and Nationality Act ("INA") § 287(a)(2) only allows immigration officials to make a warrantless arrest if they have "reason to believe" that the person is likely to escape before a warrant could be obtained. See De La Paz v. Coy, 786 F.3d 367, 376 (5th Cir. Tex. 2015) (stating that an "arrest shall be made by ICE -Agents only when the designated immigration officer has reason to believe that the person to be arrested has committed an offense against the United States or is an alien illegally in the United States.")

-The De La Paz Court further stated ... "even if an agent has reasonable belief, before making an arrest, there must also be 'a likelihood of the person escaping before a warrant can be obtained for his arrest'", citing to 8 U.S.C. § 1357(a)(2)(5).

-Reasonable suspicion for an immigration stop cannot be based "on broad profiles which cast suspicion on entire categories of people without any individualized suspicion of the particular person to be stopped." United States v. Rodriguez Sanchez, 23 F.3d 1488, 1492 (9th Cir. 1994). Rather, reasonable suspicion must be "particularized and objective," United States v. Arvizu, 534 U.S. 266, 273 (2002).

PRAYER FOR RELIEF: *For the above foregoing reasons, Petitioner respectfully request that this Court take the following:*

1- Assume jurisdiction

2 -Motion To Expedite Review Of Writ of ***Habeas Corpus***

3-Enjoining Respondents from transferring the Petitioner out of the jurisdiction of the ***ICE [Field Office in El Paso]*** *during the pendency of these proceedings and while the Petitioner remains in Respondent's custody;*

4- Issue a ***Writ of Habeas Corpus*** *ordering Petitioner's release from immigration detention pending final resolution of this Habeas proceeding;*

5 -In the alternative, issue a Writ of ***Habeas Corpus*** *and order Petitioner's release within 2 business days unless Respondents schedule,* ***George Daniel Ramirez,*** *a hearing before a neutral immigration judge to provide a constitutionally adequate process to challenge his detention;*

6-Issue a declaration that Petitioner's ongoing detention violates the Due Process Clause, and the APA.

7-Grant such further relief as the Court deems just and proper.

Respectfully submitted on 08/25 , ***2026.***

/s George Daniel Gomez Ramirez
George Daniel Ramirez

El Paso Service Processing Center
8915 Montana Ave.,
El Paso, TX 79925

CERTIFICATE OF SERVICE

*-I, **George Daniel Ramirez**, certify that on the date: 08/25, 2026 that I filed the foregoing pleading with the Clerk of the Court by traditional method and I served the following parties by U.S. priority mail with tracking:*

***Mary De-Anda-Ybarra**, Acting ICE Office Director; El Paso11541 Montana Ave., Suite El Paso, TX 79925*

WARDEN OF ERO EL PASO CAMP EAST MONTANA.

***David J. Venturella**, ERO El Paso Camp East Montana*

6920 Digital Road El Paso, TX 79936

***Mark Wayne Mullin**, Secretary of the Department of Homeland Security2707 Martin Luther King Jr. Ave SE, Washington, D.C. 20528-0525.*

***Todd Blanche**, Acting Attorney General of the United States United States Department of Justice950 Pennsylvania Avenue NW Washington, D.C. 20530I further certify that on Date: 08/25, 2026 I served the United States District Court/ Western District Court of Texas/ EL PASO DIVISION/ Office of the Clerk 525 Magoffin Ave., El Paso, TX 79901 by delivering a copy of the foregoing pleading In person.*

/s George Daniel Gomez Ramirez

George Daniel Ramirez

E

.IDENTIFICATION

.COURTS ABD DECISIONS OF JUDGE.

.EVIDENCE

Exhibit A
Identification Documents

Exhibit B
Immigration, Custody, and Release Records

ORDER OF RELEASE ON RECOGNIZANCE
(CONTINUATION PAGE)

Alien Name	Picture	Right Index Print
GOMEZ-RAMIREZ, GEORGE DANIEL		[redacted]
File Number [redacted] / Date: June 23, 2023		
Alien's Signature: George Gomez		
Alien's Telephone Number (if any): [redacted]		
Alien's Address: [redacted]		
CHICAGO ILLINOIS 60604		

PERSONAL REPORT RECORD

Date	Officer	Comment/Changes
20 Jul 2023	CART kiosk	1930 Beach St. Broadview, IL 60155

Signature	Title
MERCER, A 8620	Deportation Officer

ORDER OF RELEASE ON RECOGNIZANCE (ADDENDUM)

File No.: [redacted]

Name: GOMEZ-RAMIREZ, GEORGE DANIEL

Date: June 23, 2023

☒ That you do not associate with known gang members, criminal associates, or be associated with any such activity.

☐ That you register in a substance abuse program within 14 days and provide ICE with written proof of such within 30 days. The proof must include the name, address, duration, and objectives of the program as well as the name of a counselor.

☐ That you register in a sexual deviancy counseling program within 14 days and provide ICE with written proof of such within 30 days. You must provide ICE with the name of the program, the address of the program, duration and objectives of the program as well as the name of a counselor.

☐ That you register as a sex offender, if applicable, within 7 days of being released, with the appropriate agency(s) and provide ICE with written proof of such within 10 days.

☒ That you do not commit any crimes while on this Order of Release on Recognizance.

☐ That you report to any parole or probation officer as required within 5 business days and provide ICE with written verification of the officer's name, address, telephone number, and reporting requirements.

☐ That you continue to follow any prescribed doctor's orders whether medical or psychological including taking prescribed medication.

☒ That you provide ICE with written copies of requests to Embassies or Consulates requesting the issuance of a travel document.

☒ That you provide ICE with written responses from the Embassy or Consulate regarding your request.

☒ Any violation of the above conditions will result in revocation of your employment authorization document.

☒ Any violation of these conditions may result in you being taken into ICE custody and you being criminally prosecuted.

☐ Other:

X George Gomez
(Signature of Alien)

ORDER OF RELEASE ON RECOGNIZANCE
(OUT-PROCESSING CHECKLIST)

Sex Offenders

- ☐ Probation/Parole Officer Notified
- ☐ Registered as sex-offender as required by state statute within 7 days
- ☐ Victim/Witness Coordinator Notified
- ☐ Victim/Witness Notified
- ☐ Written Proof of Counseling

Substance Abusers

- ☐ Probation/Parole Officer Notified
- ☐ Written Proof of Counseling

All Aliens

- ☐ Probation/Parole Officer Notified
- ☒ Obtain address where living and telephone number
- ☒ Enter into IDENT FINS#: [redacted]
- ☒ NCIC Check
- ☐ Travel Document Application
- ☐ Other: _____

Completed By	
Deportation Officer: MERCER, A 8620	Date 06/23/2023

Concurrence By	
Supervisory Detention and Deportation Officer: URBANSKI, R 4842	Date 06/23/2023

NOTICE OF CUSTODY DETERMINATION

Alien's Name: GOMEZ-RAMIREZ, GEORGE DANIEL

A-File Number: [redacted]

Date: 06/23/2023

Event ID: [redacted]

Subject ID: [redacted]

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that, pending a final administrative determination in your case, you will be:

☐ Detained by the Department of Homeland Security.

☒ Released (check all that apply):

☐ Under bond in the amount of $ _____

☒ On your own recognizance.

☐ Under other conditions. [Additional document(s) will be provided.]

URBANSKI, E 4842
Name and Signature of Authorized Officer

06/23/2023 01:19 PM
Date and Time of Custody Determination

SDDO
Title

ICE ERO CHICAGO FIELD OFFICE 101 W IDA B WELLS DR, 4TH FLOOR CHICAGO, IL US 60605
Office Location/Address

You may request a review of this custody determination by an immigration judge.

☐ I acknowledge receipt of this notification, and

☐ I do request an immigration judge review of this custody determination.

☐ I do not request an immigration judge review of this custody determination.

George Gomez
Signature of Alien

06-23-2023
Date

The contents of this notice were read to GOMEZ-RAMIREZ, GEORGE DANIEL (Name of Alien) in the SPANISH (Name of Language) language.

MERCER, A 8620
Name and Signature of Officer

Name or Number of Interpreter (if applicable)

Deportation Officer
Title

You are required to retain this permit in your possession and to surrender it to the transportation line at the time of your departure unless you depart over the land border of the United States in which case you must surrender it to a Canadian immigration officer on the Canadian border, or to a United States immigration officer of the Mexican border.

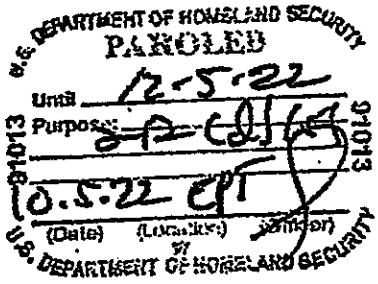
DEPARTURE RECORD

Port:

Date:

Manner:

Country of Destination :



UNITED STATES DEPARTMENT OF HOMELAND SECURITY

Form Approved OMB No. 43-R0495

ARRIVAL - DEPARTURE RECORD

Form I-94 (Rev. 08/01/07)

FINS #:1327181369 Subject ID:380415282 Event No:EPS2310000287

1. FAMILY NAME (Capital Letters) First Name Middle Name	2. Age	3. Country of Citizenship
GOMEZ-RAMIREZ, GEORGE DANIEL	30	VENEZUELA

4. Alias	5. Date Apprehended	6. Office
	October 04, 2022	EPT/EPS

7. Birth Date	8. Birth Place	14A.
[redacted]	VENEZUELA, VENEZUELA	
9. Sex ☒ Male ☐ Female	10. OSC/WA Served ☒ Yes ☐ No (Explain)	
11. File Number A246 143 943	12. Bond $ Date Posted	
13. CINS ☐ Yes ☒ No	14 Medical Alert ☐ No ☐ Yes (Explain)	

15. TRANSFER DATE	FROM	TO
A		
B		
C		

16. ADMITTED BY:	19. RELEASED TO: ☐ V/R ☐ Deport	22. Rt. Index Print – In	23. Rt. Index Print - Out
17. SEARCHED IN BY:	20. RELEASED BY:	[redacted]	
18. DATE ADMITTED:	21. DATE RELEASED:		
24. Remarks: See I-831			

FORM I-385 (08/01/07) ALIEN BOOKING RECORD
UNITED STATES DEPARTMENT OF HOMELAND SECURITY

quasi-judicial capacity and [illegible]

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/I-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at https://www.ice.gov/contact/ero, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

_____
(Signature of Respondent)

Before: _____

Date: _____

_____
(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on June 23, 2025, in the following manner and in compliance with section 239(a)(1) of the Act.

☒ in person ☐ by certified mail, returned receipt # _____ requested ☐ by regular mail

☐ Attached is a credible fear worksheet.

☒ Attached is a list of organizations and attorneys which provide free legal services.

The alien was provided oral notice in the SPANISH language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

George Gomez
(Signature of Respondent if Personally Served)

A 5520 MERCER - Deportation Officer
(Signature and Title of officer)

[illegible] permit, border crossing card, or other valid entry document required by the Immigration and Nationality Act.

ON THE BASIS OF THE FOREGOING, IT IS CHARGED THAT YOU ARE SUBJECT TO REMOVAL FROM THE UNITED STATES PURSUANT TO THE FOLLOWING PROVISION(S) OF LAW:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

212(a)(7)(A)(i)(I) of the Immigration and Nationality Act (Act), as amended, as an immigrant who, at the time of application for admission, is not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act.

Signature	Title
Z 4842 URBANSKI	SDDO

4 of 4 Pages

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that GOMEZ-RAMIREZ, GEORGE DANIEL is removable from the United States. This determination is based upon:

- ☑ the execution of a charging document to initiate removal proceedings against the subject;
- ☐ the pendency of ongoing removal proceedings against the subject;
- ☐ the failure to establish admissibility subsequent to deferred inspection;
- ☑ biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- ☑ statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

YOU ARE COMMANDED to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.

(Signature of Authorized Immigration Officer)

E 4842 URBANSKI - SDDO
(Printed Name and Title of Authorized Immigration Officer)

Certificate of Service

I hereby certify that the Warrant for Arrest of Alien was served by me at CHICAGO, IL (Location)

on GOMEZ-RAMIREZ, GEORGE DANIEL (Name of Alien) on June 23, 2023 (Date of Service), and the contents of this notice were read to him or her in the SPANISH (Language) language.

A 8620 MERCER
Deportation Officer
Name and Signature of Officer

Name or Number of Interpreter (if applicable)

Form I-200 (Rev. 09/15)

Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

☒ You must report for any hearing or interview as directed by Immigration and Customs Enforcement or the Executive Office for Immigration Review.

☒ You must surrender for removal from the United States if so ordered.

☒ You must report in (writing) (person) to Duty officer at ICE ERO EL CENTRO on 07/20/2023 08:00 as directed.

If you are allowed to report in writing, the report must contain your name, alien registration number, current address, place of employment, and other pertinent information as required by the officer listed above.

☒ You must not change your place of residence without first securing written permission from the officer listed above.

☒ You must not violate any local, State or Federal laws or ordinances.

☒ You must assist Immigration and Customs Enforcement in obtaining any necessary travel documents.

☐ Other: *Your release is contingent upon your enrollment and successful participation in an Alternatives to Detention (ATD) program as designated by the U.S. Department of Homeland Security. As part of the ATD program, you will be subject to electronic monitoring and may be subject to a curfew. Failure to comply with the requirements of the ATD program will result in a redetermination of your release conditions or your arrest and detention.*

If fitted with a U.S. Immigration and Customs Enforcement GPS tracking ankle bracelet, do not tamper with or remove the device. Under federal law, it is a crime to willfully damage or attempt to damage property of the United States. Damaging or attempting to damage the GPS tracking ankle bracelet or any of its associated equipment (including, but not limited to, the charging station, batteries, power cords, etc.) may result in your arrest, detention, and prosecution under 18 U.S.C. § 1361 and/or 18 U.S.C. § 641, each punishable by a fine, up to ten years imprisonment, or both.

☒ See attached sheet containing other specified conditions (Continue on separate sheet if required)

NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by Immigration and Customs Enforcement.

DEPARTY; E 4812
(Name and Title of ICE Official)

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

I hereby acknowledge that I have (read) (had interpreted and explained to me in the SPANISH 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.

A. Wu
(Signature of ICE Official Serving Order)

George Gomez
(Signature of Alien)

05/23/2023
Date

I hereby cancel this order of release because:

☐ The alien failed to comply with the conditions of release. ☐ The alien was taken into custody for removal.

(Signature of ICE Official Cancelling Order) Date

Exhibit C
Applications for Immigration Relief and Related Notices

Receipt Number	USCIS Account Number	Case Type
[redacted]	[redacted]	I765 - APPLICATION FOR EMPLOYMENT AUTHORIZATION
Received Date: 01/15/2025	Priority Date: 01/15/2025	Applicant: [redacted] GOMEZ RAMIREZ, GEORGE DANIEL
Notice Date: 01/29/2025	Page: 1 of 1	

GOMEZ RAMIREZ, GEORGE DANIEL
c/o GEORGE DANIEL GOMEZ RAMIREZ
[redacted]

Notice Type: Approval Notice
Class: C08
Valid from 01/27/2025 **to** 01/26/2030

We have approved your application for employment authorization. We will send your Employment Authorization Document (EAD) (also known as an EAD card or Form I-766) to you separately. Your EAD card should be produced within one to two weeks. Your EAD card will be mailed via U.S. Postal Service (USPS) Priority Mail with Delivery Confirmation to the address you designated. The time frame in which you will receive your EAD card may vary, depending on USPS delivery times. Please allow a total of 30 days from approval before inquiring with USCIS. We encourage you to use Case Status Online https://egov.uscis.gov/ to find your USPS tracking number for EAD card delivery. If you have not received your EAD card within this time frame, please visit https://egov.uscis.gov/e-request/Intro.do for instructions on how to submit an inquiry.

Your EAD card is proof that you are allowed to work in the United States. Show the card to your employer to verify your authorization to work during the dates on the card. You cannot use this approval notice as proof of your employment authorization.

When you receive your EAD card, please check that all the information on the card is correct. If you need to change any information on the card, please mail all of the following to the office listed below:

- A letter explaining what information needs to be corrected,
- Your EAD card,
- A photocopy of this notice, and
- Evidence to show what the correct information should be. For example, if you need to correct your name, submit a copy of your birth certificate or official name change.

If You Have a Pending Form I-485

If you have a pending or approved Form I-140 and a pending Form I-485, you may request to change employers if your Form I-485 has been pending for at least 180 days. In order to do so, you need to submit documentation about your new job offer. For more information on how to request a change of employers and what information you must submit, please visit the USCIS website at www.uscis.gov.

If your EAD card expires before we make a final decision on your Form I-485, you may apply for a new EAD card.

THIS FORM IS NOT A VISA AND MAY NOT BE USED IN PLACE OF A VISA OR EVIDENCE OF EMPLOYMENT AUTHORIZATION.

NOTICE: Although this application or petition has been approved, USCIS and the U.S. Department of Homeland Security reserve the right to verify this information before and/or after making a decision on your case so we can ensure that you have complied with applicable laws, rules, regulations, and other legal authorities. We may review public information and records, contact others by mail, the internet or phone, conduct site inspections of businesses and residences, or use other methods of verification. We will use the information obtained to determine whether you are eligible for the benefit you seek. If we find any derogatory information, we will follow the law in determining whether to provide you (and the legal representative listed on your Form G-28, if you submitted one) an opportunity to address that information before we make a formal decision on your case or start proceedings.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to https://www.uscis.gov/file-online.

Texas Service Center
U.S. CITIZENSHIP & IMMIGRATION SVC
6046 N Belt Line Rd., STE 110
Irving TX 75038-0012

USCIS Contact Center: www.uscis.gov/contactcenter

[redacted]

Receipt Number	USCIS Account Number	Case Type
[redacted]	[redacted]	I821 - APPLICATION FOR TEMPORARY PROTECTED STATUS
Received Date 03/01/2024	**Priority Date** 03/01/2024	**Applicant** [redacted] GOMEZ RAMIREZ, GEORGE DANIEL
Notice Date 09/05/2024	**Page** 1 of 2	

GOMEZ RAMIREZ, GEORGE DANIEL
[redacted]

Notice Type: Approval Notice
Valid from: 09/05/2024 to 04/02/2025

You have been granted Temporary Protected Status (TPS) under section 244 of the Immigration and Nationality Act. The benefits of TPS are temporary protection from removal (or deportation), employment authorization in the United States, and the opportunity to apply for travel authorization.

Attached to this notice is a Form I-94 indicating your Temporary Protected Status in the United States. The I-94 is valid until the expiration date shown on it.

If you requested an employment authorization document (EAD) pursuant to your registration for TPS, you will receive a separate notice containing the decision on that request. If your EAD request is approved, you will be issued an EAD that will be valid until the expiration date shown on the EAD itself. The EAD will serve as evidence of your TPS and employment authorization.

If the TPS designation is extended, you must re-register with U.S. Citizenship and Immigration Services (USCIS) within the time period designated for re-registration. If you wish to obtain an EAD valid for the time period of the extended TPS designation, you must also apply for an EAD during the filing period(s) described in the applicable Federal Register notice (FRN). The FRN notice will provide guidance on required forms and application fees to re-register for TPS and to apply for a new EAD. You should also pay close attention to any future FRNs issued by USCIS regarding your country's TPS, including any information that may be included in such notices about possible automatic extensions of the validity date(s) on EADs.

Failure to re-register during a TPS extension re-registration period may result in the withdrawal of your TPS and may result in removal proceedings being initiated against you.

While you are under Temporary Protected Status, you:

(1) will not be removed from the United States;

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to https://www.uscis.gov/file-online.

USCIS TSC
U.S. CITIZENSHIP & IMMIGRATION SVC
6046 N Belt Line Rd. STE 114
Irving TX 75038-0015

USCIS Contact Center: www.uscis.gov/contactcenter

[redacted]

PLEASE TEAR OFF FORM I-94 PRINTED BELOW AND STAPLE TO ORIGINAL I-94 IF AVAILABLE

Detach This Half for Personal Records

Receipt [redacted]
I-94#
NAME GOMEZ RAMIREZ, GEORGE DANIEL
CLASS

VALID FROM 09/05/2024 **UNTIL** 04/02/2025

APPLICANT: GOMEZ RAMIREZ, GEORGE DANIEL
[redacted]

Receipt Number [redacted]
United States Citizenship and Immigration Services

I94 Departure Record

14 Family Name	
GOMEZ RAMIREZ	
15 First (Given) Name	16 Date of Birth
GEORGE DANIEL	06/10/1992
17 Country of Citizenship	
VZ	

FORM I-797A [REV 08/01/16]

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

Receipt Number	USCIS Online Account Number	Case Type
[redacted]	[redacted]	I821 - APPLICATION FOR TEMPORARY PROTECTED STATUS
Received Date	**Priority Date**	**Applicant** [redacted]
09/10/2025	09/10/2025	GOMEZ RAMIREZ, GEORGE DANIEL
Notice Date	**Page**	
09/10/2025	1 of 1	

GOMEZ RAMIREZ, GEORGE DANIEL
[redacted]

Notice Type: Receipt Notice
Received Amount: $ 30.00 U.S.
Paid

Thank you for submitting your application, petition, or request. Our office is currently processing it.

Please verify your personal information listed above. If you need to make any changes, immediately notify the USCIS Contact Center using the phone number below.

Next Steps:

- We will schedule you for an appointment at a USCIS Application Support Center (ASC) for you to provide your fingerprints, photograph and/or signature.
- We will mail you a separate biometrics appointment notice with the specific date, time, and ASC location. Please wait until you receive your appointment notice before going to the ASC.

Be advised that this notice does NOT serve as notification of your biometrics appointment.

If you have any questions or comments regarding this notice or the status of your case, please contact the USCIS Contact Center toll free at 1-800-375-5283. If you are hearing impaired, please call the Contact Center TDD at 1-800-767-1833.

If you have questions about immigration benefits, services, filing information, or forms, please visit our website at www.uscis.gov or call the NCSC.

If your mailing address changes while your case is pending, please update it through your USCIS Online Account or by calling the USCIS Contact Center.

You will be notified separately about any other application, petition, or request you may have filed with us.

Please note that if a priority date appears on this notice, it does not reflect any earlier retained priority dates.

Please see the additional information on the back. We will notify you separately about any other cases you have filed.

USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to https://www.uscis.gov/file-online.

SCOPS TEXAS FACILITY
U.S. CITIZENSHIP & IMMIGRATION SVC
6046 N BELT LINE RD.
IRVING TX 75038-0001

USCIS Contact Center: www.uscis.gov/contactcenter

Exhibit D
ICE Reporting and Supervision Records

[redacted]
June 10, 1992

Printed: June 23, 2023 1:38:57 PM

Next Reporting Date: July 20, 2023 between 8:00 AM and 12:00 PM.

Participant reported on N/A. Identity verified through CART. System check show no new/derogatory information. No wants, no warrants.

For information on an Immigration court case, please go to: https://acis.eoir.justice.gov or call 800-898-7180.

Please keep this receipt with your records. Store receipt away from sunlight.



ICE

I-220R

June 10, 1992

Next Reporting Date: July 23, 2024 between 8:00 AM and 12:00 PM.

Participant reported on July 20, 2023. Identity verified through CART. System check show no new/derogatory information. No wants, no warrants.

For information on an Immigration court case, please go to: https://acis.eoir.justice.gov or call 800-898-7180.

Please keep this receipt with your records. Store receipt away from sunlight.



ICE

I-220R

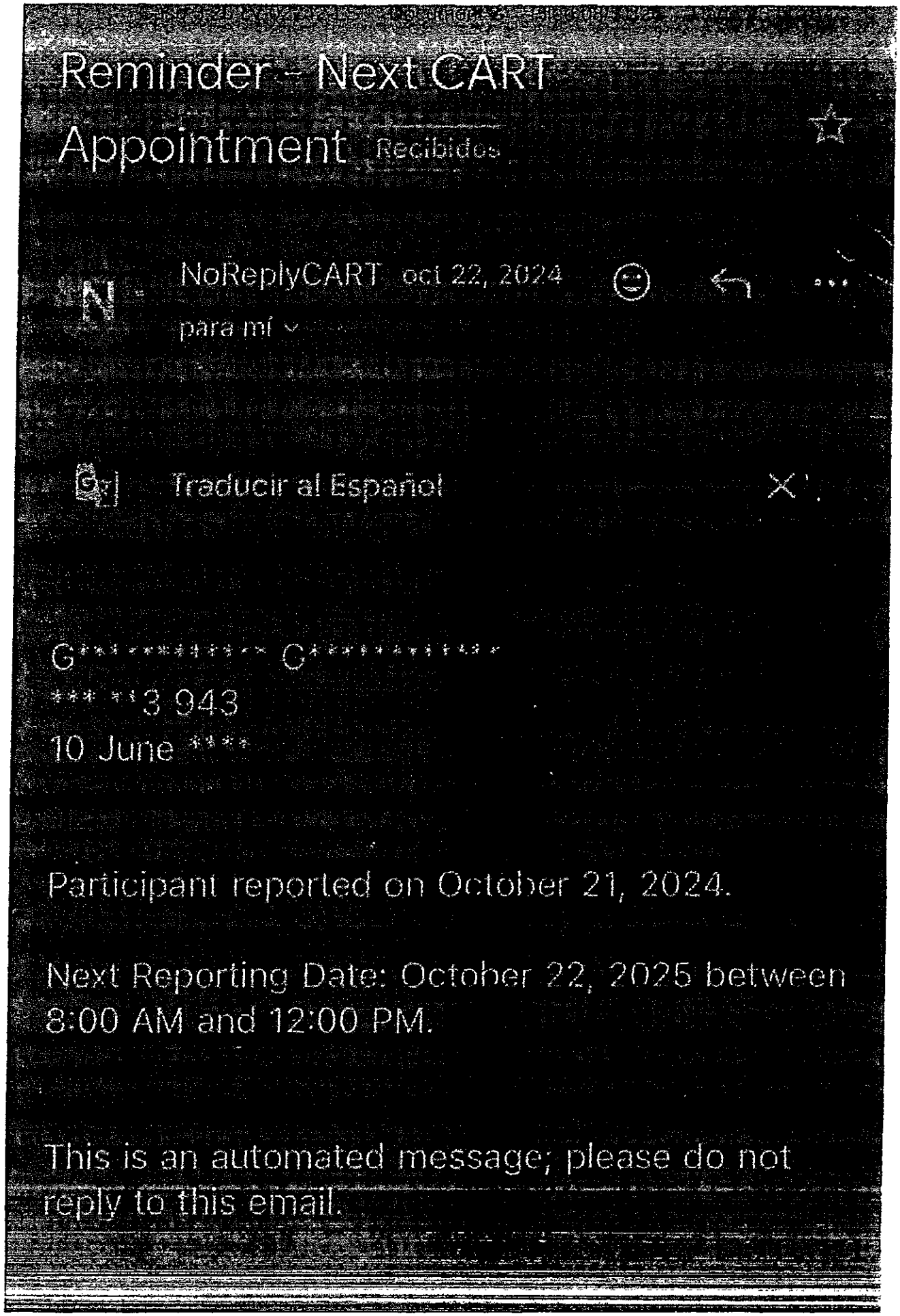

Reminder - Next CART Appointment
Recibidos
N
NoReplyCART oct 22, 2024
para mí
Traducir al Español
G**** ******** C**********
*** **3 943
10 June ****
Participant reported on October 21, 2024.
Next Reporting Date: October 22, 2025 between 8:00 AM and 12:00 PM.
This is an automated message; please do not reply to this email.

Exhibit F
Family Support Records and Sponsor Affidavit

AFFIDAVIT OF SUPPORT

IN THE MATTER OF:
GEORGE DANIEL GOMEZ RAMÍREZ

Date: 06/26/2026

I, Edgar A. Alvarez, residing at [redacted], am a business owner and submit this affidavit in support of George Daniel Gómez Ramírez.

I came to know George in August 2024, when he visited one of my motorcycle shops and purchased a motorcycle. From that initial meeting, we remained in contact and developed an ongoing friendship.

In the time I have known him, George has consistently presented himself as a serious, respectful, and hardworking man. In my dealings with him, I have found him to be honest, steady, and responsible. He is someone who takes his obligations seriously and handles his affairs with maturity.

I have also come to know him as a man who cares deeply about his family. It has been clear to me that his children are important to him and that he takes his role as a father seriously. His words and actions have reflected genuine concern for their emotional and financial well-being.

Another quality that stands out to me is his perseverance. I understand that he has faced difficult personal and financial circumstances, yet he has continued moving forward through work, discipline, and personal effort. That persistence has reinforced my trust in his character.

Based on my personal knowledge of George and my interactions with him, I believe he is a person who would take any court-imposed obligation seriously. If released, I believe he would comply with all conditions set by the Court and continue focusing on his family and responsibilities.

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

Executed on: 06/26/2026

Edgar A. Alvarez

[redacted]

N.Y.S. DEPARTMENT OF STATE
DIVISION OF CORPORATIONS AND STATE RECORDS ALBANY, NY 12231-0001

ONLINE FILING RECEIPT

ENTITY NAME: NYCYCLING LLC

DOCUMENT TYPE: ARTICLES OF ORGANIZATION (DOM. LLC) COUNTY: QUEE

FILED:07/13/2020 DURATION:********** CASH#: [redacted] FILE#: [redacted]
DOS ID: [redacted]

FILER:
EDGAR A ALVAREZ
[redacted]

EXIST DATE
07/13/2020

ADDRESS FOR PROCESS:
NYCYCLING LLC
[redacted]

REGISTERED AGENT:

The limited liability company is required to file a Biennial Statement with the Department of State every two years pursuant to Limited Liability Company Law Section 301. Notification that the Biennial Statement is due will only be made via email. Please go to www.email.ebiennial.dos.ny.gov to provide an email address to receive an email notification when the Biennial Statement is due.

SERVICE COMPANY: ** NO SERVICE COMPANY **
SERVICE CODE: 00

FEE:	205.00
FILING:	200.00
TAX:	0.00
PLAIN COPY:	5.00
CERT COPY:	0.00
CERT OF EXIST:	0.00

PAYMENTS	205.00
CHARGE	205.00
DRAWDOWN	0.00

DOS-1025 (04/2007)

IRS DEPARTMENT OF THE TREASURY
INTERNAL REVENUE SERVICE
CINCINNATI OH 45999-0023

Date of this notice: 09-17-2025

Employer Identification Number:
39-4411212

Form: SS-4

Number of this notice: CP 575 G

GALAPAGOS OCEAN SEAFOOD LLC
EDGAR A ALVAREZ SOLE MBR
% EDGAR A ALVAREZ SOLE MBR
[redacted]

For assistance you may call us at:
1-800-829-4933

IF YOU WRITE, ATTACH THE
STUB AT THE END OF THIS NOTICE.

WE ASSIGNED YOU AN EMPLOYER IDENTIFICATION NUMBER

Thank you for applying for an Employer Identification Number (EIN). We assigned you EIN 39-4411212. This EIN will identify you, your business accounts, tax returns, and documents, even if you have no employees. Please keep this notice in your permanent records.

Taxpayers request an EIN for their business. Some taxpayers receive CP575 notices when another person has stolen their identity and are opening a business using their information. If you did not apply for this EIN, please contact us at the phone number or address listed on the top of this notice.

When filing tax documents, making payments, or replying to any related correspondence, it is very important that you use your EIN and complete name and address exactly as shown above. Any variation may cause a delay in processing, result in incorrect information in your account, or even cause you to be assigned more than one EIN. If the information is not correct as shown above, please make the correction using the attached tear-off stub and return it to us.

A limited liability company (LLC) may file Form 8832, *Entity Classification Election*, and elect to be classified as an association taxable as a corporation. If the LLC is eligible to be treated as a corporation that meets certain tests and it will be electing S corporation status, it must timely file Form 2553, *Election by a Small Business Corporation*. The LLC will be treated as a corporation as of the effective date of the S corporation election and does not need to file Form 8832.

To obtain tax forms and publications, including those referenced in this notice, visit our Web site at www.irs.gov. If you do not have access to the Internet, call 1-800-829-3676 (TTY/TDD 1-800-829-4059) or visit your local IRS office.

IMPORTANT REMINDERS:

- Keep a copy of this notice in your permanent records. This notice is issued only one time and the IRS will not be able to generate a duplicate copy for you. You may give a copy of this document to anyone asking for proof of your EIN.
- Use this EIN and your name exactly as they appear at the top of this notice on all your federal tax forms.
- Refer to this EIN on your tax-related correspondence and documents.
- Provide future officers of your organization with a copy of this notice.

Your name control associated with this EIN is GALA. You will need to provide this information along with your EIN, if you file your returns electronically.

Safeguard your EIN by referring to Publication 4557, Safeguarding Taxpayer Data: A Guide for Your Business.

You can get any of the forms or publications mentioned in this letter by visiting our website at www.irs.gov/forms-pubs or by calling 800-TAX-FORM (800-829-3676).

If you have questions about your EIN, you can contact us at the phone number or address listed at the top of this notice. If you write, please tear off the stub at the bottom of this notice and include it with your letter.

Thank you for your cooperation.

Keep this part for your records. CP 575 G (Rev. 7-2007)

Return this part with any correspondence so we may identify your account. Please correct any errors in your name or address.

CP 575 G
9999999999

Your Telephone Number Best Time to Call
( ) -

DATE OF THIS NOTICE: 09-17-2025
EMPLOYER IDENTIFICATION NUMBER: 39-4411212
FORM: SS-4 NOBOD

INTERNAL REVENUE SERVICE
CINCINNATI OH 45999-0023

GALAPAGOS OCEAN SEAFOOD LLC
EDGAR A ALVAREZ SOLE MBR
[redacted] MBR

Exhibit G
Letters of Support

DECLARATION IN SUPPORT OF

GEORGE DANIEL GÓMEZ RAMÍREZ

Declarant: Juleidy Iskel Mendoza López
Address: [redacted]
Date: 07/02/2026

I, Juleidy Iskel Mendoza López, make this declaration in support of George Daniel Gómez Ramírez based on my personal knowledge and my relationship with him.

George and I met in Venezuela in 2017 through our workplace, and over time our relationship grew into a committed partnership. Since then, I have known him closely in both everyday life and difficult moments, and I have had the opportunity to see how he handles responsibility, family, and hardship.

In our years together, I have known George as a hardworking and dependable man. He takes his role within the family seriously and has always tried to provide emotional and financial support to the best of his ability. He is not indifferent to the needs of others. He listens, he helps when he can, and he remains present for the people closest to him.

I have also seen the way he responds under pressure. During the most difficult periods we have faced, he has not walked away from his obligations. On the contrary, he has continued trying to move forward, solve problems responsibly, and maintain order in his life. That consistency is one of the qualities I respect most about him.

George has had a meaningful impact on my life and on our family. His perseverance, generosity, and commitment have helped us endure difficult circumstances without losing direction. For that reason, I believe he would take any condition imposed by the Court seriously and would continue working to rebuild and maintain stability.

I make this declaration truthfully and from my own personal experience with him.

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

Executed on: 07/02/2026

Juleidy Mendoza

Juleidy Iskel Mendoza López

[redacted]

STATEMENT OF SUPPORT
FOR GEORGE DANIEL GÓMEZ RAMÍREZ

In the Matter of George Daniel Gómez Ramírez

Statement of: Angel Claret Reyes Schafer
Address: [redacted]
Occupation: Food Delivery Driver
Date: 06/23/2026

My name is Angel Claret Reyes Schafer, and I live at [redacted] I work as a food delivery driver. I am writing this statement in support of George Daniel Gómez Ramírez.

I have known George for more than ten years because we grew up in the same neighborhood. Over that time, I have been able to know him not only as a friend, but also as the kind of person he is in daily life and in difficult moments.

George has always been a responsible, hardworking, and respectful person. He is someone who pays attention to his obligations and tries to do things the right way. In my experience, he is also the kind of person who helps others without needing to be asked twice.

He has been present for me and for my family in both good times and hard times. That is one of the reasons I value him so much. He has consistently shown support, encouragement, and a genuine willingness to be there for the people close to him.

From what I have personally seen, George takes his family, his work, and his responsibilities seriously. Since his arrival, it has been clear to me that his intention has been to move forward in the right way and to meet the expectations placed on him.

For these reasons, I believe George would take any condition imposed by the Court seriously and would continue to act responsibly if he is given the opportunity to remain with his family and continue his life in order.

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

Executed on: 06/23/2026

Angel Reyes
Angel Claret Reyes Schafer

[redacted]

SWORN DECLARATION IN SUPPORT OF
GEORGE DANIEL GÓMEZ RAMÍREZ

Name of Declarant: Yohamny Julie Daza Vanegas
Residence: [redacted]
Date: 06/[redacted]

I, Yohamny Julie Daza Vanegas, make this declaration in support of George Daniel Gómez Ramírez from my own personal knowledge.

I live at [redacted] and I am a homemaker. I have known George for approximately three years, during which time we worked together and I had the opportunity to observe the way he conducts himself with other people and with his responsibilities.

In my experience, George is a calm, respectful, and dependable person. He does not act carelessly, and he does not take opportunities or obligations lightly. He carries himself with prudence and shows a strong sense of responsibility in the way he handles his life.

On a personal level, I can also say that he has been supportive during important moments. He has had a positive effect on me through his encouragement, his steady demeanor, and the way he remains present when others need support.

Based on the time I have known him and the experiences I have had with him, I believe George is someone who would take any requirement imposed on him seriously and would make every effort to comply with it.

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

Executed on: 06/19/2026

Yohamny Julie Daza Vanegas

[redacted]

Exhibit H

Additional Supporting Documents

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UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
EL PASO SPC IMMIGRATION COURT

Respondent Name:
GOMEZ RAMIREZ, GEORGE DANIEL

To:
GOMEZ RAMIREZ, GEORGE DANIEL
EL PASO SPC
8915 MONTANA AVE
EL PASO, TX 79925

A-Number:
[redacted]

Riders:
In Custody Redetermination Proceedings

Date:
07/09/2026

ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

☑ Denied, because
The respondent poses an extreme flight risk if released on bond.

☐ Granted. It is ordered that Respondent be:
- ☐ released from custody on his own recognizance.
- ☐ released from custody under bond of $
- ☐ other:

☐ Other:

[redacted]

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