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

JUDGE LEON SCHYDLOWER

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

VICTOR MANUEL ROMERO OLIVAS, Petitioner,	§ § § §	Civil Action No. _____ EP: 26-CV-02249
v. FACILITY ADMINISTRATOR / WARDEN OF PETITIONER'S CURRENT DETENTION FACILITY, name presently unknown; and appropriate DHS/ICE officials in their official capacities, Respondents.	§ § § § § §	EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER, NO-TRANSFER ORDER, AND EXPEDITED RELIEF

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER, NO-TRANSFER ORDER, AND EXPEDITED RELIEF

Petitioner, proceeding pro se, respectfully moves for narrowly tailored emergency relief preserving the Court's ability to adjudicate his § 2241 custody petition and preserving meaningful access to judicial process.

1. Emergency circumstances. I have been detained since approximately July 23, 2026. I was transferred from Aurora, Colorado, on August 27, 2026 and report arriving at a detention location in or near Vinton, Texas at approximately 6:00 p.m. My exact facility and immediate custodian have not yet been reliably confirmed to me or my supporters.

2. Risk of irreparable harm. A further transfer without meaningful notice could interfere with my ability to identify my custodian, communicate with the Court, obtain and preserve legal papers, consult counsel if counsel becomes available, and prosecute this action. Physical removal from the United States before I can pursue whatever review is legally available could likewise cause irreparable consequences.

3. Family and community circumstances. My U.S.-born son depends on me. I have longstanding family and community ties, and I possess recent law-enforcement certification evidence relevant to potential immigration relief. These circumstances heighten the need for a short, orderly period in which the Court can determine jurisdiction and the Government can respond.

4. Requested no-transfer relief. Pending expedited review, I ask the Court to order Respondents not to transfer me outside the Western District of Texas without advance notice to me and the Court sufficient to preserve this proceeding, or alternatively to provide reasonable advance notice of any transfer and the destination, and to disclose my exact location and immediate custodian immediately.

5. Requested preservation of access. I ask the Court to require preservation of my legal papers and reasonable confidential access to legal calls, legal mail, and communications necessary to prosecute this case.

6. Removal/status-quo request and jurisdictional limitation. I recognize that this District Court generally may not use § 2241 to review the merits of a final removal order. I nevertheless ask the Court, only to the extent it determines it has lawful authority, to preserve the status quo against physical removal for the minimum period necessary to determine its jurisdiction and adjudicate the emergency custody/access issues. If the Court concludes it lacks authority to restrain removal, I request that it still grant the no-transfer, disclosure, legal-access, and expedited-response relief within its authority.

7. Security. I am detained and proceeding pro se. I request waiver of security to the extent permitted by law.

WHEREFORE, I respectfully request immediate consideration, an expedited Government response, and the earliest practicable hearing.

Executed on: August 28, 2026



Victor Manuel Romero Olivas, Petitioner Pro Se
A#[redacted]

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

VICTOR MANUEL ROMERO OLIVAS - A# [redacted]

INDEX OF EXHIBITS

Date: August 28, 2026

Ex.	Description	Purpose / Note
A	EOIR Automated Case Information - August 28, 2026	Current public EOIR system printout; system states case information is unavailable and notes database limitations.
B	Immigration Judge Written Decision - April 30, 2019	Procedural history; denial of cancellation of removal; voluntary departure and alternate removal order.
C	Board of Immigration Appeals Decision - February 23, 2023	BIA cover notice and complete four-page decision supplied by Petitioner/supporters.
D	Colorado Springs Police Department / Form I-918 Supplement B	Law-enforcement certification materials relevant to potential U nonimmigrant relief; does not by itself prove USCIS filing.
E	Declaration / Support Letter of David Flores - August 23, 2026	Long-term character, work, family, and community ties.
F	Declaration / Support Letter of Jonathan Cruz - August 21, 2026	Long-term relationship, work/business history, community character, and father-son relationship.
G	Declaration / Support Letter of Jennifer Nayelli Olivas	Family ties, work/business history, community contribution, and parenting.

Filing note: The habeas petition and emergency motion are provided as separate filing PDFs. This exhibit volume is organized with a separator immediately before each exhibit. Original documents should be retained. Image enhancement was limited to contrast/sharpness and page normalization; substantive content was not changed.

EXHIBIT A

EOIR Automated Case Information - August 28, 2026

Victor Manuel Romero Olivas - A# [redacted]

August 28, 2026

An official website of the United States government
Here's how you know

EOIR Automated Case Information

Court Closures Today August 28, 2026

Please check https://www.justice.gov/eoir-operational-status for up to date closures.

Automated Case Information

Welcome to the Automated Case Information System (ACIS). ACIS provides basic information about the status of certain cases before an immigration court or the Board of Immigration Appeals. Not all cases, or all information about a case is displayed. ACIS includes details regarding the primary case only. If there has been more than one case for the A-Number, ACIS displays the most recent case. Please contact your local court if you need bond hearing information.

English

Enter your A-Number

A-Number **Required* *What's an A-Number?*

[redacted]

Nationality **Required* *What is Nationality?*

MEXICO (MX)

Case information is unavailable.

SUBMIT

ⓘ *Case information from this automated resource is provided for convenience only. Documents the immigration court or Board of Immigration Appeals issue to you or your representative are the only official determinations related to your case.*

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EXHIBIT B

Immigration Judge Written Decision - April 30, 2019

Victor Manuel Romero Olivas - A# [redacted]
August 28, 2026

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
1961 STOUT STREET, STE. 3101
DENVER, CO 80294

Law Office of Angela Corral
Corral, Angela Aguirre
PO Box 1900
Englewood, CO 80150

In the matter of File A [redacted] DATE: Apr 30, 2019
ROMERO-OLIVAS, VICTOR MANUEL

__ Unable to forward - No address provided.

✓ Attached is a copy of the decision of the Immigration Judge. This decision is final unless an appeal is filed with the Board of Immigration Appeals within 30 calendar days of the date of the mailing of this written decision. See the enclosed forms and instructions for properly preparing your appeal. Your notice of appeal, attached documents, and fee or fee waiver request must be mailed to: Board of Immigration Appeals
Office of the Clerk
5107 Leesburg Pike, Suite 2000
Falls Church, VA 22041

__ Attached is a copy of the decision of the immigration judge as the result of your Failure to Appear at your scheduled deportation or removal hearing. This decision is final unless a Motion to Reopen is filed in accordance with Section 242b(c)(3) of the Immigration and Nationality Act, 8 U.S.C. §§ 1252b(c)(3) in deportation proceedings or section 240(b)(5)(C), 8 U.S.C. §§ 1229a(b)(5)(C) in removal proceedings. If you file a motion to reopen, your motion must be filed with this court:
IMMIGRATION COURT
1961 STOUT STREET, STE. 3101
DENVER, CO 80294

__ Attached is a copy of the decision of the immigration judge relating to a Reasonable Fear Review. This is a final order. Pursuant to 8 C.F.R. §§ 1208.31(g)(1), no administrative appeal is available. However, you may file a petition for review within 30 days with the appropriate Circuit Court of Appeals to appeal this decision pursuant to 8 U.S.C. §§ 1252; INA §§242.

__ Attached is a copy of the decision of the immigration judge relating to a Credible Fear Review. This is a final order. No appeal is available.

__ Other: _____

A. DeHerrera
COURT CLERK
IMMIGRATION COURT FF

cc: WILLIAMS, ELIZABETH
12445 E CALEY AVE
CENTENNIAL, CO, 80111

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
1961 STOUT STREET, SUITE 3101
DENVER, COLORADO 80294

In The Matter Of:	)	**Date:** April 30, 2019
ROMERO OLIVAS, Victor	)	
Respondent.	)	IN REMOVAL PROCEEDINGS
File No.: [redacted]	)	

CHARGE: Section 237(a)(1)(C)(i) of the Immigration and Nationality Act (INA or the Act), as amended, in that, after admission as a nonimmigrant under section 101(a)(15) of the Act, and 235.1(f)(iii) of Title 8 Code of Federal Regulations (C.F.R.), you failed to comply with the conditions of the nonimmigrant status under which you were admitted.

APPLICATIONS: Cancellation of Removal pursuant to INA § 240A(b)(2), Voluntary Departure under INA § 240B(b).

ON BEHALF OF RESPONDENT:
Angela Aguirre Corral, Esquire
Law Office of Angela Corral
P.O. Box 280393
Lakewood, CO 80228

ON BEHALF OF DEPARTMENT:
Elizabeth Williams, Assistant Chief Counsel
U.S. Department of Homeland Security
12445 East Caley Avenue
Centennial, CO 80111

WRITTEN DECISION

I. Facts and Procedural History

Victor Manuel Romero Olivas (Respondent) is a thirty-six-year-old native and citizen of Mexico. On November 23, 2009, Respondent was admitted to the United States in El Paso, Texas with authorization to remain in the United States for no longer than seventy-two hours, and not outside twenty-five miles of the border with Mexico. Respondent was located in Colorado Springs, Colorado on October 9, 2010. Thus, on December 14, 2010, the Department of Homeland Security (DHS or the Department) served Respondent with a Notice to Appear (NTA), charging Respondent as removable from the United States pursuant to sections 237(a)(1)(C). Exhibit 1, NTA. DHS filed the NTA with the Denver Immigration Court on January 3, 2011, which sent Respondent a Notice of Hearing on February 1, 2011, thereby initiating these removal proceedings and vesting jurisdiction with this Court. 8 C.F.R. § 1003.14(a); *Matter of Bermudez-Cota*, 27 I&N Dec. 441 (BIA 2018).

IMMIGRATION COURT
1961 STOUT STREET, STE. 3101
DENVER, CO. 80294

In the Matter of:

ROHERO-OLIVAS, VICTOR MANUEL
Respondent

Case No.: [redacted]

IN REMOVAL PROCEEDINGS

ORDER OF THE IMMIGRATION JUDGE

This is a summary of the ~~oral~~ decision entered on 04/30/2019
This memorandum is solely for the convenience of the parties. If the proceedings should be appealed or reopened, the oral decision will become the official opinion in the case.

[ ] The respondent was ordered removed from the United States to or in the alternative to .

[ ] Respondent's application for voluntary departure was denied and respondent was ordered removed to or in the alternative to .

(X) Respondent's application for voluntary departure was granted until July 31, 2019 upon posting a bond in the amount of $ 500.00 with an alternate order of removal to Mexico

Respondent's application for:

[ ] Asylum was ( )granted ( )denied( )withdrawn.
[ ] Withholding of removal was ( )granted ( )denied ( )withdrawn.
[ ] A Waiver under Section ____ was ( )granted ( )denied ( )withdrawn.
[ ] Cancellation of removal under section 240A(a) was ( )granted ( )denied ( )withdrawn.

Respondent's application for:

[ ] Cancellation under section 240A(b)(1) was ( ) granted ( ) denied ( ) withdrawn. If granted, it is ordered that the respondent be issued all appropriate documents necessary to give effect to this order.

(X) Cancellation under section 240A(b)(2) was ( )granted (X)denied ( )withdrawn. If granted it is ordered that the respondent be issued all appropriated documents necessary to give effect to this order.

[ ] Adjustment of Status under Section ____ was ( )granted ( )denied ( )withdrawn. If granted it is ordered that the respondent be issued all appropriated documents necessary to give effect to this order.

[ ] Respondent's application of ( ) Withholding of removal ( ) deferral of removal Under Article III of the Convention Against Torture was ( ) granted ( ) denied ( ) withdrawn.

[ ] Respondent's status was rescinded under section 246.
[ ] Respondent is admitted to the United States as a _____ until _____.
[ ] As a condition of admission, respondent is to post a $ _____ bond.
[ ] Respondent knowingly filed a frivolous asylum application after proper notice.
[ ] Respondent was advised of the limitation on discretionary relief for failure to appear as ordered in the Immigration Judge's oral decision.
[ ] Proceedings were terminated.
(X) Other: Please see attached written decision.

Date: ~~Jul 24, 2018~~ April 30, 2019

Melanie K. Corrin
MELANIE K. CORRIN
Immigration Judge

Appeal: Waived/Reserved Appeal Due By:

Both May 30, 2019

On September 26, 2012 the Respondent admitted the allegations contained in the Notice to Appear and conceded the charge. He designated Mexico as the country of removal, should removal become necessary. As such, the Court sustained the charge of removability pursuant to 237(a)(1)(C) of the Act.

On September 26, 2012, Respondent advised the Court that he would be pursuing an I-360, Petition for VAWA designation before the United States Citizenship & Immigration Service (USCIS), and requested a continuance, which was granted. *See* Exhibit 2. On June 9, 2014 the Respondent requested an additional continuance while his Petition was pending, which was also granted. Exhibit 3 and 3a. Due to shifting priorities in the Immigration Courts, the Respondent's case was then continued by the Court until February 6, 2017. On February 6, 2017, Mr. Romero Olivas filed a Form EOIR 42B, Application for Cancellation of Removal and Adjustment of Status for Certain Nonpermanent Residents (42B), seeking relief under section 240A(b)(2)(A) of the Act, along with evidence that his I-360 had been denied by USCIS. Exhibits 4-6. The Court set an individual hearing on the merits of his application for February 14, 2018. On January 16, 2018 the Respondent filed documents in support of his application, and submitted an updated application on February 14, 2018. The Respondent requested a continuance to gather and file documentation supporting continuous presence and evidence of fear in the EOIR 42-B with the Court. The Court granted the continuance to July 24, 2018, at which time the Respondent testified in support of his application. DHS did not call any witnesses.

Also on July 24, 2018 the Respondent filed a Motion to Terminate Removal Proceedings based on the United States Supreme Court decision in *Pereira v. Sessions*, 138 S. Ct. 2105, 2113-14 (2018). The Department of Homeland Security detailed its opposition to termination on the record, and the Court reserved decision both on the application for Cancellation of Removal and the Motion to Terminate. On October 10, 2018 the Court issued a decision denying the Motion to Terminate Removal Proceedings based on the precedent decision issued by the Board of Immigration Appeals in *Matter of Bermudez Cota*, 27 I&N Dec. 441 (BIA 2018).

For the reasons set forth below, the Court will deny Respondent's application for cancellation of removal under sections 240A(b)(2) and 240A(b)(1) of the Act.

II. Evidence & Testimony

The Record of Proceeding includes fifteen exhibits. The Court has given thorough consideration to all of the evidence submitted, regardless of whether that evidence is specifically named in this decision.

Mr. Romero Olivas alleges that his former wife, Ms. Nora Yurida Perez Villalobos subjected him to extreme cruelty when she contacted the police based on a domestic argument they had, and he was subsequently arrested. The Respondent testified that when he and his ex-wife married he loved her, but that their relationship ended due to a fight. He testified that she called the police and he was sent to jail. He remembered the argument occurring in the beginning of October 2010, and he believes she called the police and told them a man named "Manuel Trujillo" was threatening her. He testified that she lied and gave the police that name, as well as a false name for herself, because she had a warrant. The Respondent testified that she gave her daughter's

name, but that he could not remember what her daughter's name was. After being arrested the Respondent advised police of what his legal name was, but he was arrested as Manuel Trujillo. He believes that this is because everything his ex-wife told the police was untruthful. He stated that he did not have his identification at the time, but that the police searched their database, found him and a picture, and he said that "was me", but he was processed under the other name. The record reflects that the Respondent's true name is listed as an "AKA". Exhibit 7.

The Respondent testified that he tried to present documents that showed his name, but he was unable to access them as he was incarcerated, and his ex-wife had all of his documents. He stated that he was in jail for three months but the case was ultimately dismissed. When he was eventually released he attempted to collect his belongings, including his visa, license, and identification, but those items were missing or not given to him. He stated that his car and cell phone were also not there, as well as other personal belongings.

The Respondent and his ex-wife divorced about three years ago, and in the agreement she was ordered to return any of his belongings that she still had. He stated that as far as he knew she did not have control of his vehicle. He states that she advised him she had left it in a parking lot, and a tow truck took it away. He testified that because they could not communicate, there was no way they could serve the notices regarding his car. He testified that he never reconciled with Ms. Perez Villalobos, but that she did go to visit him at one point and told him she was leaving with another person in Mexico. The Respondent testified that he had never been arrested before in Mexico and was very embarrassed. He testified that after one or two months his friends learned he had been arrested.

On cross examination, the Respondent testified that he met his ex-wife at a Quinceanera in July or August of 2009 or 2010; he was initially confused about the year, but then confirmed 2010. He stated that they often moved back and forth from one address to another during their relationship because he was living at a friend's home, and when that friend had rooms to rent the Respondent would remain there, and they would also sometimes go to Ms. Perez Villalobos's mother's house. He stated that he got along with her mother, and they all respected each other.

He further testified that the argument they had which led to his arrest by immigration officials was because she wanted to leave a party, and he did not want her to. He stated that he was verbally preventing her from leaving; telling her not to leave, and asking "why are you doing this to me?". He believes she was going to meet another man. He stated that during their relationship she would threaten him often and threaten to call the police. He stated that the argument happened at the home of some friends, and that "logically" he was not going "to do anything." The Respondent testified that he did not believe he did anything wrong, and that they knew the brother of homeowner of the house they were in and that the friend's wife and children were there. He further stated that this incident occurred around a month after they were married.

The Respondent stated that the judge in the domestic violence case did grant him a bond, however he chose not to pay it because there was an immigration hold and he did not want to have to pay two bonds. He also stated that he believes he was incarcerated because he did not have identification, rather than based on the arrest and criminal charges.

The Respondent stated that in regards to his car, he never called the police because the car was not in his name. He purchased it in Phoenix, Arizona through an account in his friend Alfonso Chairez Cisneros name, and thus the car had to be registered in the United States with his friend's name. He testified that he has not had communication with his friend regarding the car.

The Court had a number of questions for the Respondent to clarify the issues. He stated that he lived with his ex-wife for a total of about two months, and that at the time she had four children, but he could not remember all of their names because they did not live with her. Three of the children lived with their fathers, and one with her mother. He stated that he was arrested at a "dance" or club, and that while they had argued earlier at the friend's house, he thought things had calmed down and they went to the dance together that night. It is his belief that she spoke to the police there, because he was arrested when he was leaving to go outside. He testified that he has seen her a few times since this incident because he got his hair cut at the same place as some of her kids, and they saw each other from time to time. He stated that she never called the police again for a restraining order violation, and that the order had been vacated.

III. Cancellation of Removal Pursuant to INA § 240A(b)(2)

An applicant for special rule cancellation under section 240A(b)(2) must show that he meets five requirements. First, he must show that he has been battered or subjected to extreme cruelty by a United States citizen (USC) or lawful permanent resident (LPR) spouse or parent. INA § 240A(b)(2)(A)(i). Second, the applicant must demonstrate that he has been physically present in the United States for a period of not less than three years immediately preceding the date of such application. INA § 240A(b)(2)(A)(ii). Third, he must show he has been a person of good moral character in the three-year period preceding the Court's final administrative decision. INA § 240A(b)(2)(iii); *see also Matter of Ortega-Cabrera*, 23 I&N Dec. 793 (BIA 2005). Fourth, he must show that he is not inadmissible under sections 212(a)(2) or (3), not removable under sections 237(a)(1)(G), (2)-(4) of the Act, and has not been convicted of an aggravated felony. INA § 240A(b)(2)(A)(iv). Finally, he must show that removal would result in extreme hardship to himself, his child, or his parent. INA § 240A(b)(2)(A)(v).

Respondent alleges that he is eligible for special rule cancellation of removal based on his prior marriage to Ms. Nora Yurida Perez Villalobos, a USC. Accordingly, Respondent must show that Ms. Perez Villalobos "battered or subjected [him] to extreme cruelty." INA § 240A(b)(2)(A)(i)(I). The Act does not define the terms "battered" or "extreme cruelty" for purposes of special rule cancellation, and neither the Tenth Circuit nor the Board of Immigration Appeals have clarified the terms. The Ninth Circuit, however, directly addressed the issue of what conduct rises to the level of "batter[y]" or "extreme cruelty" in *Lopez-Birrueta v. Holder*, 633 F.3d 1211 (9th Cir. 2011). There, the court held that the regulatory definition in section 204.2(c) of the Code of Federal Regulations applies to special rule cancellation of removal. *Id.* at 1214-16. Under this regulation, factors for the court to consider include "any act or threatened act of violence," "sexual abuse," as well as violent acts "that, in and of themselves, may not initially appear violent but that are part of an overall pattern of violence." C.F.R. § 204.2(c)(1)(vi). The court also distinguished between "battery" and "extreme cruelty," concluding that the term "extreme cruelty" includes more than physical violence; it encompasses psychological and mental cruelty as well. *Id.* at 1216; *see Hernandez v. Ashcroft*, 345 F.3d 824 (9th Cir. 2003) ("[A]ny act of physical abuse

is deemed to constitute domestic violence without further inquiry, while 'extreme cruelty' describes all other manifestations of domestic violence."). The ultimate finding of whether certain actions constitute battery or extreme cruelty is a discretionary determination for the court. *See Perales-Cumpean v. Gonzales*, 429 F.3d 977 (10th Cir. 2005) ("The definition [of extreme cruelty] is far from algorithmic. It requires consideration of many discretionary factors.").

Even when considered in the aggregate, Respondent's account of Ms. Perez Villalobos's treatment does not arise to "extreme cruelty." Respondent recounted an isolated incident when Ms. Perez Villalobos contacted the police regarding an argument they had, and he was arrested. He also stated that during their marriage she also threatened to call the police. He did not testify to suffering any physical, psychological, or emotional injuries as a result of these incidents, other than the embarrassment that naturally arises out of being arrested by the police. Additionally, Ms. Perez Villalobos's threats to call the police, while undoubtedly emotionally disturbing, do not entail violent acts or threats of violent acts against Respondent, nor do these acts establish a pattern of violence. *See* C.F.R. § 204.2(c)(1)(vi). Lastly, the loss of documents appears to be retaliatory in nature, rather than an act of abuse, as it occurred after Respondent was arrested due to the argument they had. The Court will note that the Respondent was charged with Harassment – Strike/Shove/Kick under Colorado Revised Statute § 18-9-111(1)(a), and the charges were dismissed. After this incident the Respondent and his former spouse separated and eventually divorced. Nonetheless, even if her language and behavior toward him is considered alongside her other acts of alleged abuse, her treatment of Respondent is not so severe or pervasive to constitute battery or extreme cruelty as required by the Act. INA § 240A(b)(2)(A)(i)(I).

As Respondent failed to establish that his United States citizen wife battered him or subjected him to extreme cruelty, the Court finds that he is statutorily ineligible for special rule cancellation of removal. The Court, therefore, denies Respondent's application for relief pursuant to section 240A(b)(2) of the Act.

IV. VOLUNTARY DEPARTURE

The Court finds that Respondent satisfies the statutory elements for voluntary departure under section 240B(b)(1) of the Act. He has been present for the requisite one year preceding the date the NTA was served, has not been convicted of a disqualifying offense, has not been prohibited by any of the explicit bars laid out in section 101(f) of the Act, and has the means and intent to depart the United States as demonstrated by his testimony and lengthy employment history. INA § 240B(b)(1).

Voluntary departure is also a discretionary form of relief. INA § 240B(b) ("The Attorney General *may* permit an alien voluntarily to depart the United States . . . .") (emphasis added). Respondent has demonstrated, based upon the numerous positive equities in his case, including his length of residency in the United States, his lengthy employment history, and his relative lack of a criminal history, that he merits a favorable exercise of the Court's discretion.

Therefore, the Court grants Respondent's request for voluntary departure.

V. CONCLUSION

The Court finds that Respondent failed to establish that he is statutorily eligible for cancellation of removal under INA § 240A(b)(2). However, the Court finds that Respondent demonstrated his eligibility for voluntary departure and grants him that relief.

Accordingly, the Court will enter the following orders:

ORDERS

IT IS HEREBY ORDERED that Respondent's application for cancellation of removal pursuant to INA § 240A(b)(2) be DENIED.

It is FURTHER ORDERED that Respondent be GRANTED Voluntary Departure under section 240B(b) of the Act, in lieu of removal, without expense to the Government, on or before SIXTY (60) calendar days from the date of service of this order.

It is FURTHER ORDERED that Respondent post a voluntary departure bond in the amount of $500 with the Department of Homeland Security within five (5) business days.

It is FURTHER ORDERED that Respondent shall provide to the Department of Homeland Security his or her passport or other travel documentation sufficient to assure lawful entry into the country to which the alien is departing within thirty (30) days of this order, or within any time extensions that may be granted by the Department of Homeland Security.

It is FURTHER ORDERED that if any of the above ordered conditions are not met as required, or if Respondent fails to depart as required, the above grant of post-conclusion voluntary departure shall be withdrawn without further notice or proceedings and the following order, entered pursuant to 8 C.F.R. § 1240.26(d), shall become immediately effective: Respondent shall be removed to MEXICO on the charge(s) in the Notice to Appear.

Respondent is HEREBY ADVISED that if he fails to voluntarily depart the United States within the time specified, or within any extensions that may be granted by the Department of Homeland Security, Respondent will be subject to the following penalties:

1. Respondent will be subject to a civil monetary penalty of not less than $1,000 and not more than $5,000. INA § 240B(d). The Court has set the presumptive civil monetary penalty amount of $3,000. 8 C.F.R. § 1240.26(j).

2. Respondent will be ineligible, for a period of 10 years, to receive cancellation of removal, adjustment of status, registry, voluntary departure; or a change in nonimmigrant status. INA § 240B(d).

Respondent is FURTHER ADVISED that if he appeals this decision, he must provide to the Board

of Immigration Appeals, within 30 days of filing an appeal, sufficient proof of having posted the voluntary departure bond. The Board will not reinstate the voluntary departure period in its final order if Respondent does not submit timely proof to the Board that the voluntary departure bond has been posted. 8 C.F.R. § 1240.26(c)(3)(ii).

Respondent is FURTHER ADVISED that if he does not appeal this decision and instead files a motion to reopen or reconsider during the voluntary departure period, the period allowed for voluntary departure will not be stayed, tolled, or extended, the grant of voluntary departure will be terminated automatically, the alternate order of removal to MEXICO will take effect immediately, and the above penalties for failure to depart voluntarily under section 240B(d) of the Act, 8 U.S.C. § 1229c(d), will not apply. 8 C.F.R. §§ 1240.26(c)(3)(iii), (e)(1).

APPEAL RIGHTS: Both parties have the right to appeal the decision in this case. Any appeal is due to the Board of Immigration Appeals on or before thirty (30) calendar days from the date of service of this decision.

04/30/2019
Date

Melanie K. Corrin
Immigration Judge

EXHIBIT C

Board of Immigration Appeals Decision - February 23, 2023

Victor Manuel Romero Olivas - A# 

August 28, 2026

U.S. Department of Justice

Executive Office for Immigration Review

Board of Immigration Appeals
Office of the Clerk

5107 Leesburg Pike, Suite 2000
Falls Church, Virginia 22041

ROMERO-OLIVAS, VICTOR MANUEL
[redacted]

DHS/ICE OFFICE OF CHIEF COUNSEL - DEN
12445 East Caley Avenue
Centennial CO 80111-5663

Name: ROMERO-OLIVAS, VICTOR MAN A [redacted]

Date of this Notice: 2/23/2023

Enclosed is a copy of the Board's decision in the above-referenced case. This copy is being provided to you as a courtesy. Your attorney or representative has been served with this decision pursuant to 8 C.F.R. § 1292.5(a). If the attached decision orders that you be removed from the United States or affirms an Immigration Judge's decision ordering that you be removed, any petition for review of the attached decision must be filed with and received by the appropriate court of appeals within 30 days of the date of the decision.

Sincerely,

Donna Carr

Donna Carr
Chief Clerk

Enclosure:

Ucerlcam Docket

NOT FOR PUBLICATION

U.S. Department of Justice
Executive Office for Immigration Review
Board of Immigration Appeals

MATTER OF:

Victor Manuel ROMERO-OLIVAS, A [redacted]

Respondent

FILED
Feb 23, 2023

ON BEHALF OF RESPONDENT: Alexander D. McShiras, Esquire

ON BEHALF OF DHS: Kalin Ivany, Assistant Chief Counsel

IN REMOVAL PROCEEDINGS
On Appeal from a Decision of the Immigration Court, Denver, CO

Before: Couch, Appellate Immigration Judge

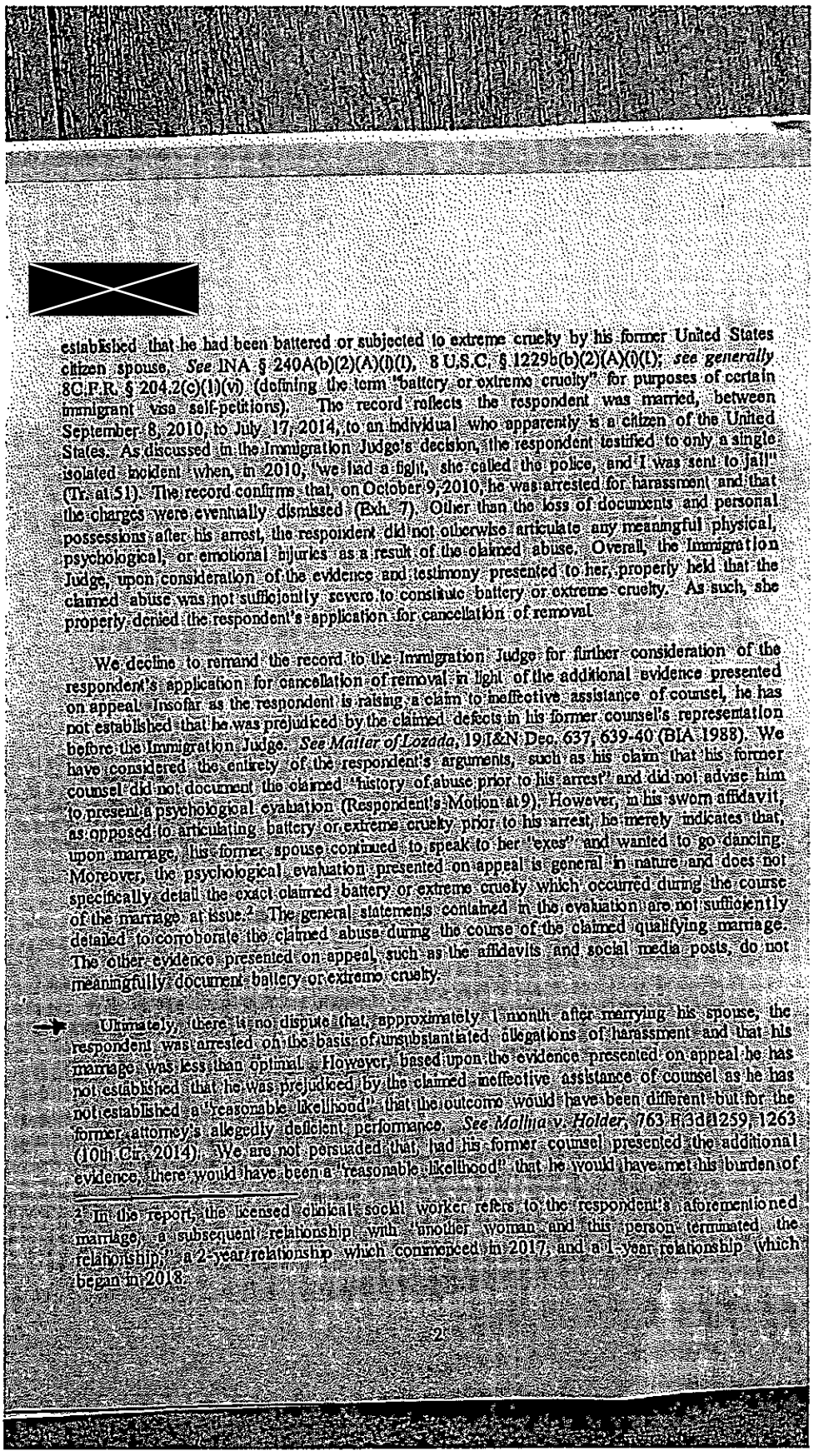
COUCH, Appellate Immigration Judge

The respondent, a native and citizen of Mexico, appeals the decision of the Immigration Judge, dated April 30, 2019, denying his application for special rule cancellation of removal under section 240A(b)(2) of the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1229b(b)(2), and granting his alternative request for voluntary departure under section 240B(b) of the INA, 8 U.S.C. § 1229c(b).[1] He has also filed a motion to remand. The Department of Homeland Security has filed an opposition to his motion to remand. We will dismiss the respondent's appeal, deny his motion to remand, and reinstate the 60-day period of voluntary departure.

We review the findings of fact, including the determination of credibility, made by the Immigration Judge under the "clearly erroneous" standard. 8 C.F.R. § 1003.1(d)(3)(i). We review all other issues, including issues of law, discretion, or judgment, under a de novo standard. 8 C.F.R. § 1003.1(d)(3)(ii). It is the respondent's burden to establish eligibility for relief from removal. INA § 240(c)(4)(A), 8 U.S.C. § 1229a(c)(4)(A); 8 C.F.R. § 1240.8(d).

We affirm the Immigration Judge's decision. The Immigration Judge properly denied the respondent's application for special rule cancellation of removal upon concluding that he had not

[1] It is undisputed that the respondent is subject to removal from the United States as charged (Exh. 1). *See* INA § 237(a)(1)(C)(i), 8 U.S.C. § 1227(a)(1)(C)(i). The respondent's motion to accept a late filing, filed on September 9, 2022, is granted. To the extent that, in his notice of appeal, he argued that the Notice to Appear was defective, such claim is foreclosed by precedent. *See, e.g., Martinez-Perez v. Barr*, 949 F.3d 1273, 1278 (10th Cir. 2020); *Lopez-Munoz v. Barr*, 941 F.3d 1013, 1015–18 (10th Cir. 2019); *Matter of Bermudez-Cota*, 27 I&N Dec. 441 (BIA 2018). His objection was untimely raised on July 24, 2018, well after he had entered pleadings in this matter on September 26, 2012 (IJ at 1; Tr. at 9). *See Matter of Fernandes*, 28 I&N Dec. 605, 610 (BIA 2022).

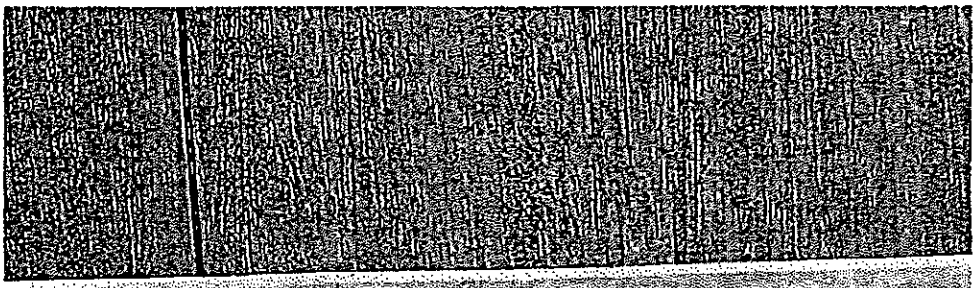


established that he had been battered or subjected to extreme cruelty by his former United States citizen spouse. *See* INA § 240A(b)(2)(A)(i)(I), 8 U.S.C. § 1229b(b)(2)(A)(i)(I); *see generally* 8C.F.R. § 204.2(c)(1)(vi) (defining the term "battery or extreme cruelty" for purposes of certain immigrant visa self-petitions). The record reflects the respondent was married, between September 8, 2010, to July 17, 2014, to an individual who apparently is a citizen of the United States. As discussed in the Immigration Judge's decision, the respondent testified to only a single isolated incident when, in 2010, "we had a fight, she called the police, and I was sent to jail" (Tr. at 51). The record confirms that, on October 9, 2010, he was arrested for harassment and that the charges were eventually dismissed (Exh. 7). Other than the loss of documents and personal possessions after his arrest, the respondent did not otherwise articulate any meaningful physical, psychological, or emotional injuries as a result of the claimed abuse. Overall, the Immigration Judge, upon consideration of the evidence and testimony presented to her, properly held that the claimed abuse was not sufficiently severe to constitute battery or extreme cruelty. As such, she properly denied the respondent's application for cancellation of removal.

We decline to remand the record to the Immigration Judge for further consideration of the respondent's application for cancellation of removal in light of the additional evidence presented on appeal. Insofar as the respondent is raising a claim to ineffective assistance of counsel, he has not established that he was prejudiced by the claimed defects in his former counsel's representation before the Immigration Judge. *See Matter of Lozada*, 19 I&N Dec. 637, 639-40 (BIA 1988). We have considered the entirety of the respondent's arguments, such as his claim that his former counsel did not document the claimed "history of abuse prior to his arrest" and did not advise him to present a psychological evaluation (Respondent's Motion at 9). However, in his sworn affidavit, as opposed to articulating battery or extreme cruelty prior to his arrest, he merely indicates that, upon marriage, his former spouse continued to speak to her "exes" and wanted to go dancing. Moreover, the psychological evaluation presented on appeal is general in nature and does not specifically detail the exact claimed battery or extreme cruelty which occurred during the course of the marriage at issue.[2] The general statements contained in the evaluation are not sufficiently detailed to corroborate the claimed abuse during the course of the claimed qualifying marriage. The other evidence presented on appeal, such as the affidavits and social media posts, do not meaningfully document battery or extreme cruelty.

Ultimately, there is no dispute that, approximately 1 month after marrying his spouse, the respondent was arrested on the basis of unsubstantiated allegations of harassment and that his marriage was less than optimal. However, based upon the evidence presented on appeal he has not established that he was prejudiced by the claimed ineffective assistance of counsel as he has not established a "reasonable likelihood" that the outcome would have been different but for the former attorney's allegedly deficient performance. *See Molina v. Holder*, 763 F.3d 1259, 1263 (10th Cir. 2014). We are not persuaded that, had his former counsel presented the additional evidence, there would have been a "reasonable likelihood" that he would have met his burden of

[2] In the report, the licensed clinical social worker refers to the respondent's aforementioned marriage, "a subsequent relationship with another woman and this person terminated the relationship," a 2-year relationship which commenced in 2017, and a 1-year relationship which began in 2018.



[redacted]

establishing that he was battered or subjected to extreme cruelty by his former United States citizen spouse. *See* INA § 240A(b)(2)(A)(i)(I), 8 U.S.C. § 1229b(b)(2)(A)(i)(I). Accordingly, the request to remand the record on the basis of ineffective assistance of counsel is denied.

To the extent that the respondent, on appeal, also makes a general request to remand these proceedings which is not premised upon ineffective assistance of counsel, such request is also denied. He has not met his "heavy burden" of proving that, if proceedings were remanded to the Immigration Judge for consideration of the evidence presented on appeal, the new evidence would likely change the result in the case. *See Matter of Coelho*, 20 I&N Dec. 464, 472 (BIA 1992). For the reasons set forth above, the evidence presented on appeal does not warrant remanded proceedings for further consideration of the issue of whether he has met his burden of establishing that he was battered or subjected to extreme cruelty by his former United States citizen spouse.

In conclusion, we affirm the Immigration Judge's decision to deny the respondent's application for special rule cancellation of removal and conclude these proceedings by entering a voluntary departure order. Moreover, remanded proceedings are not warranted for further consideration of his claims. Accordingly, the following orders are entered.

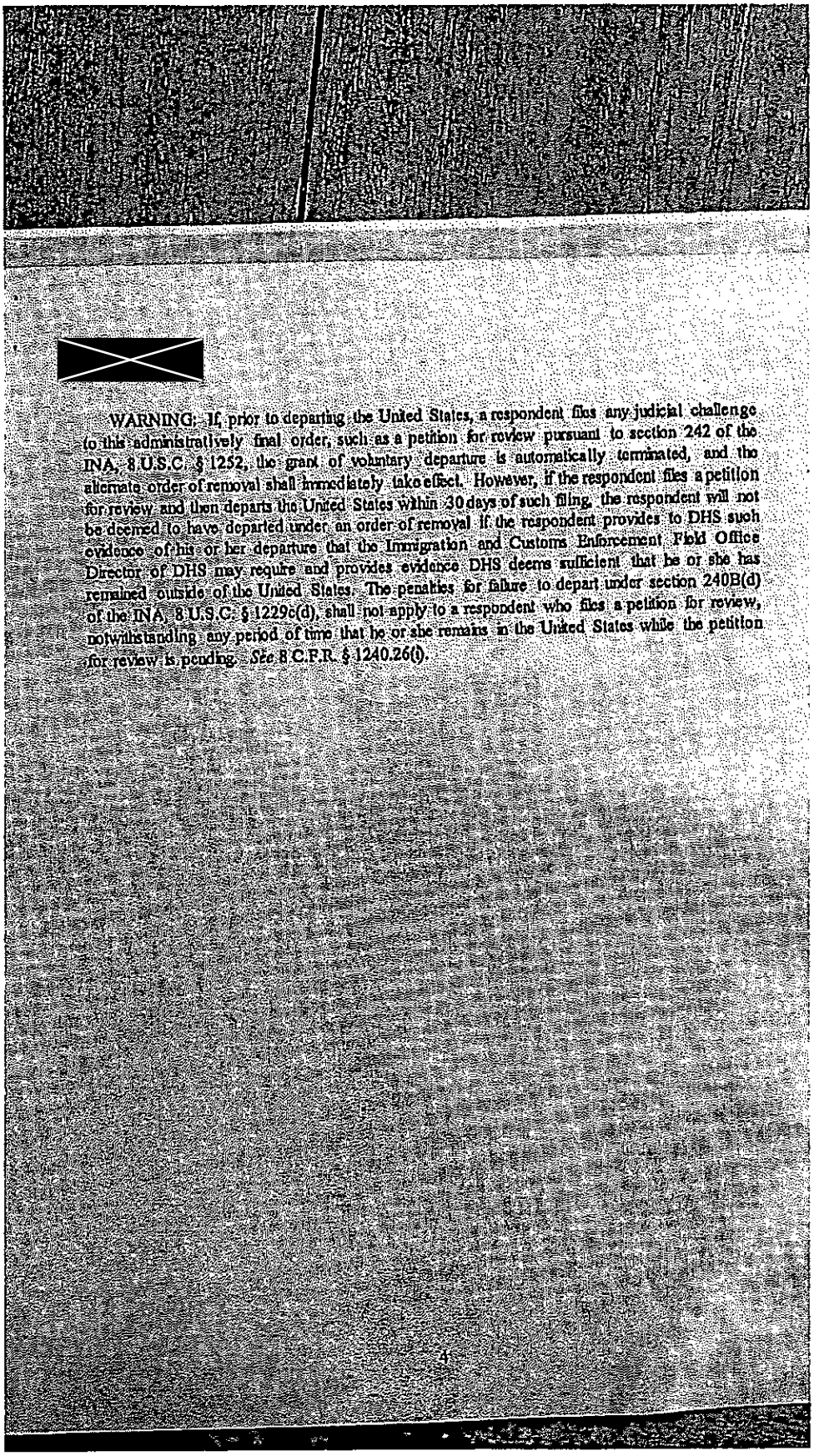
ORDER: The respondent's appeal is dismissed.

FURTHER ORDER: The respondent's motion to remand is denied.

FURTHER ORDER: Pursuant to the Immigration Judge's order and conditioned upon compliance with conditions set forth by the Immigration Judge and the statute, the respondent(s) is(are) permitted to voluntarily depart the United States, without expense to the Government, within 60 days from the date of this order or any extension beyond that time as may be granted by the Department of Homeland Security ("DHS"). *See* section 240B(b) of the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1229c(b); *see also* 8 C.F.R. § 1240.26(c), (f). In the event a respondent fails to voluntarily depart the United States, the respondent shall be removed as provided in the Immigration Judge's order.

NOTICE: If a respondent fails to voluntarily depart the United States within the time period specified, or any extensions granted by DHS, the respondent shall be subject to a civil penalty as provided by the regulations and the statute, and shall be ineligible for a period of 10 years for any further relief under sections 240B, 240A, 245, 248, and 249 of the INA, 8 U.S.C. §§ 1229b, 1255, 1258, 1259.

WARNING: If a respondent files a motion to reopen or reconsider prior to the expiration of the voluntary departure period set forth above, the grant of voluntary departure is automatically terminated; the period allowed for voluntary departure is not stayed, tolled, or extended. If the grant of voluntary departure is automatically terminated upon the filing of a motion, the penalties for failure to depart under section 240B(d) of the INA, 8 U.S.C. § 1229c(d), shall not apply. *See* 8 C.F.R. § 1240.26(e)(1).



WARNING: If, prior to departing the United States, a respondent files any judicial challenge to this administratively final order, such as a petition for review pursuant to section 242 of the INA, 8 U.S.C. § 1252, the grant of voluntary departure is automatically terminated, and the alternate order of removal shall immediately take effect. However, if the respondent files a petition for review and then departs the United States within 30 days of such filing, the respondent will not be deemed to have departed under an order of removal if the respondent provides to DHS such evidence of his or her departure that the Immigration and Customs Enforcement Field Office Director of DHS may require and provides evidence DHS deems sufficient that he or she has remained outside of the United States. The penalties for failure to depart under section 240B(d) of the INA, 8 U.S.C. § 1229c(d), shall not apply to a respondent who files a petition for review, notwithstanding any period of time that he or she remains in the United States while the petition for review is pending. *See* 8 C.F.R. § 1240.26(i).

EXHIBIT D

Colorado Springs Police Department / Form I-918 Supplement B

Victor Manuel Romero Olivas - A# [redacted]
August 28, 2026

Colorado Springs Police Department
705 S. Nevada Avenue, Colorado Springs, CO 80903

April 27, 2023

Violence Against Women Act (VAWA) Unit
Vermont Service Center
U.S. Citizenship and Immigration Services
75 Lower Welden Street
St. Albans, VT 05479

Dear Sir or Madam:

I am the appointed Chief of Police for the City of Colorado Springs, CO. As such, I am the executive head of the Colorado Springs Police Department (CSPD) and am responsible for the proper and efficient enforcement of all laws and ordinances which the police department is authorized to enforce.

Pursuant to 8 C.F.R. § 214.14 (a)(3) and 8 C.F.R § 214.14(c)(i), I hereby designate the Lieutenant of the Special Victims Section, Investigation Division of the CSPD to sign all 1-918 Supplement B, U Nonimmigrant Status Certification forms. Furthermore, in the absence of the Lieutenant of the Special Victims Section, his/her direct supervisor, the Commander of the Investigations Division, may also sign the 1-918 Supplement B, U Nonimmigrant Status Certification forms.

These specific designations shall remain in force until revoked in writing.

Sincerely,

Adrian Vasquez
Chief of Police

Colorado Springs Police Department
Investigations Division
705 S. Nevada Avenue
Colorado Springs, CO 80903
COLORADO SPRINGS
OLYMPIC CITY USA
www.ColoradoSprings.gov

Kory Dabb
Badge - 2029
Lieutenant
Special Victims Section

TEL 719-444-7591
Kory.Dabb@coloradospringsgov

CFS/Case #_____

POLICE

Safeguarding our community as our family
705 S Nevada Ave Colorado Springs, CO 80903
Phone (719) 444-7000 Fax (719) 578-6169

COLORADO SPRINGS
OLYMPIC CITY USA

Supplement B, U Nonimmigrant Status Certification

Department of Homeland Security
U.S. Citizenship and Immigration Services

USCIS
Form I-918
OMB No. 1615-0104
Expires 02/28/2026

For USCIS Use Only	Remarks

▶ START HERE - Type or print in black or blue ink.

Part 1. Victim Information

1. Alien Registration Number (A-Number) (if any)
▶ A- [redacted]

2.a. Family Name (Last Name): Romero Olivas
2.b. Given Name (First Name): Victor
2.c. Middle Name: Manuel

Other Names Used (Include maiden names, nicknames, and aliases, if applicable.)

If you need extra space to provide additional names, use the space provided in Part 7. Additional Information.

3.a. Family Name (Last Name):
3.b. Given Name (First Name):
3.c. Middle Name:

4. Date of Birth (mm/dd/yyyy) [redacted]

5. Sex ☒ Male ☐ Female

Part 2. Agency Information

1. Name of Certifying Agency
Colorado Springs Police Department

Name of Certifying Official

2.a. Family Name (Last Name): Dabb
2.b. Given Name (First Name): Kory
2.c. Middle Name:

3. Title and Division/Office of Certifying Official
Special Victims Section, Lieutenant

Name of Head of Certifying Agency

4.a. Family Name (Last Name): Vasquez
4.b. Given Name (First Name): Adrian
4.c. Middle Name:

Agency Address

5.a. Street Number and Name: 705 S Nevada Ave
5.b. ☐ Apt. ☐ Ste. ☐ Flr.:
5.c. City or Town: Colorado Springs
5.d. State: CO 5.f. ZIP Code: 80903
5.g. Province:
5.h. Postal Code:
5.i. Country: United States

Other Agency Information

6. Agency Type
☐ Federal ☐ State ☒ Local

7. Case Status
☐ On-going ☒ Completed
☐ Other

8. Certifying Agency Category
☐ Judge ☒ Law Enforcement ☐ Prosecutor
☐ Other

9. Case Number
[redacted]

10. FBI Number or SID Number (if applicable)

If you need extra space to complete this section, use the space provided in Part 7. Additional Information.

1. The petitioner is a victim of criminal activity involving a violation of one of the following Federal, State, or local criminal offenses (or any similar activity). (Select all applicable boxes)

- ☐ Abduction
- ☐ Abusive Sexual Contact
- ☐ Attempt to Commit Any of the Named Crimes
- ☐ Being Held Hostage
- ☐ Blackmail
- ☐ Conspiracy to Commit Any of the Named Crimes
- ☒ Domestic Violence
- ☐ Extortion
- ☐ False Imprisonment
- ☐ Felonious Assault
- ☐ Female Genital Mutilation
- ☐ Fraud in Foreign Labor Contracting
- ☐ Incest
- ☐ Involuntary Servitude
- ☐ Kidnapping
- ☐ Manslaughter
- ☐ Murder
- ☐ Obstruction of Justice
- ☐ Peonage
- ☐ Perjury
- ☐ Prostitution
- ☐ Rape
- ☐ Sexual Assault
- ☐ Sexual Exploitation
- ☐ Slave Trade
- ☐ Solicitation to Commit Any of the Named Crimes
- ☐ Stalking
- ☐ Torture
- ☐ Trafficking
- ☐ Unlawful Criminal Restraint
- ☐ Witness Tampering

Provide the dates on which the criminal activity occurred.

2.a. Date (mm/dd/yyyy) 01/21/2019

2.b. Date (mm/dd/yyyy)

2.c. Date (mm/dd/yyyy)

2.d. Date (mm/dd/yyyy)

3. List the statutory citations for the criminal activity being investigated or prosecuted, or that was investigated or prosecuted.

18-4-502 F5 (2), 18-9-111(1)(a) M3

4.a. Did the criminal activity occur in the United States (including Indian country and military installations) or the territories or possessions of the United States?

☒ Yes ☐ No

4.b. If you answered "Yes," where did the criminal activity occur?

[redacted] olorado Springs, CO 80916

5.a. Did the criminal activity violate a Federal extraterritorial jurisdiction statute?

☐ Yes ☒ No

5.b. If you answered "Yes," provide the statutory citation providing the authority for extraterritorial jurisdiction.

6. Briefly describe the criminal activity being investigated and/or prosecuted and the involvement of the petitioner named in Part 1. Attach copies of all relevant reports and findings.

Mr. Romero was the victim of a domestic violence (felony) incident perpetrated by his ex-girlfriend Princess [redacted]

[redacted]

7. [redacted] description of any known or documented injury to the victim. Attach copies of all relevant reports and findings.

[redacted]

Part 3. Criminal Activity of the Victim

For the following questions, if the victim is under 16 years of age, incompetent or incapacitated, then a parent, guardian, or next friend may act on behalf of the victim.

1. Does the victim possess information concerning the criminal activity listed in Part 3.? ☒ Yes ☐ No

2. Has the victim been helpful, is the victim being helpful, or is the victim likely to be helpful in the investigation or prosecution of the criminal activity detailed above?

   ☒ Yes ☐ No

3. Since the initiation of cooperation, has the victim refused or failed to provide assistance reasonably requested in the investigation or prosecution of the criminal activity detailed above?

   ☐ Yes ☒ No

If you answer "Yes" to Item Numbers 1. - 3., provide an explanation in the space below. If you need extra space to complete this section, use the space provided in Part 7. Additional Information.

Mr. Romero was very helpful and provided detailed statements to the CSPD officers. He also shared critical evidence, including audio voicemails, text messages which were helpful to the investigation. He promptly reported the domestic violence (felony) disturbance and the subsequent violation of the protective order.

4. Other. Include any additional information you would like to provide.

Part 5. Family Member Culpable in Criminal Activity

1. Are any of the victim's family members culpable or believed to be culpable in the criminal activity of which the petitioner is a victim?

☐ Yes ☒ No

If you answered "Yes," list the family members and their criminal involvement. (If you need extra space to complete this section, use the space provided in Part 7. Additional Information.)

2.a. Family Name (Last Name)

2.b. Given Name (First Name)

2.c. Middle Name

2.d. Relationship

2.e. Involvement

3.a. Family Name (Last Name)

3.b. Given Name (First Name)

3.c. Middle Name

3.d. Relationship

3.e. Involvement

4.a. Family Name (Last Name)

4.b. Given Name (First Name)

4.c. Middle Name

4.d. Relationship

4.e. Involvement

Part 6. Certification

I am the head of the agency listed in Part 2. or I am the person in the agency who was specifically designated by the head of the agency to issue a U Nonimmigrant Status Certification on behalf of the agency. Based upon investigation of the facts, I certify, under penalty of perjury, that the individual identified in Part 1. is or was a victim of one or more of the crimes listed in Part 3. I certify that the above information is complete, true, and correct to the best of my knowledge, and that I have made and will make no promises regarding the above victim's ability to obtain a visa from U.S. Citizenship and Immigration Services (USCIS), based upon this certification. I further certify that if the victim unreasonably refuses to assist in the investigation or prosecution of the qualifying criminal activity of which he or she is a victim, I will notify USCIS.

1. Signature of Certifying Official (sign in ink)

2. Date of Signature (mm/dd/yyyy) 02/23/2026

3. Daytime Telephone Number 719-444-7591

4. Fax Number

Additional Information

If you need extra space to complete any item within this supplement, use the space below or attach a separate sheet of paper. Type or print the agency's name, petitioner's name, and the Alien Registration Number (A-Number) (if any) at the top of each sheet; indicate the Page Number, Part Number, and Item Number to which your answer refers; and sign and date each sheet. If you need more space than what is provided, you may also make copies of this page to complete and file with this supplement.

1. Agency Name: Colorado Springs Police Department

Petitioner's Name

2.a. Family Name (Last Name): Romero Olivas

2.b. Given Name (First Name): Victor

2.c. Middle Name: Manuel

3. A-Number (if any): ▶ A-200821484

4.a. Page Number	4.b. Part Number	4.c. Item Number
2	3	6

4.d. [redacted]

5.a. Page Number	5.b. Part Number	5.c. Item Number
2	3	5

5.d. [redacted]

6.a. Page Number	6.b. Part Number	6.c. Item Number

6.d.

EXHIBIT E

Declaration / Support Letter of David Flores - August 23, 2026

Victor Manuel Romero Olivas - A# [redacted]
August 28, 2026

08/23/2026

To Whom It May Concern:

My name is David Flores, and I am writing this letter in support of my close friend, Victor Romero. I have known Victor for more than 20 years, and during that time I have had the opportunity to know him not only as a friend, but as a hardworking, responsible, caring, and dependable person.

Because I have known Victor for such a long period of time, I believe I have a genuine understanding of his character. He is someone who consistently treats people with respect and kindness. He is hardworking, responsible, and someone others can depend on when they need help. Throughout the many years I have known him, I have seen him work hard to provide for himself and his family and to build a stable and productive life.

Victor is the type of person who values his relationships with family and friends. He is caring toward the people around him and has always demonstrated a willingness to help others when he can. He is respectful, humble, and considerate, and I have personally seen the positive impact he has had on the people in his life.

One of the qualities I respect most about Victor is his work ethic. He understands the importance of working hard and taking responsibility for his obligations. He does not take the people who depend on him or the opportunities he has been given for granted. He has worked to establish a life and meaningful relationships in the United States, and the people who know him have come to rely upon him as a friend, family member, coworker, and member of the community.

Over the more than 20 years I have known Victor, I have never known him to be a person who intentionally seeks conflict or causes problems for others. My experience with him has been that of a person who tries to work through difficulties, take care of his responsibilities, and treat others fairly. The Victor I know is a good person who cares deeply about the people in his life.

His current situation has been extremely difficult for those who know and care about him. It is painful to see someone I have known for more than two decades facing uncertainty about his future. I believe that his long history of relationships, work, friendships, and contributions in the United States are important considerations when evaluating who he is as a person.

I respectfully ask that Victor's character, history, and the positive relationships he has established over many years be taken into consideration. I believe Victor is a hardworking and caring individual who has much to contribute to his family and community. He is someone I am proud to call my friend, and I sincerely hope he is given the opportunity to remain with the people who know, love, and depend upon him.

I am providing this letter based on my own personal knowledge and experiences with Victor over the past 20 years. I am willing to provide additional information or answer questions regarding my relationship with him and my experiences with him if needed.

Thank you for taking the time to consider this letter and for considering Victor Romero as a person beyond the circumstances of his current situation.

Sincerely,

David Flores
Peyton, CO
[redacted]

EXHIBIT F

Declaration / Support Letter of Jonathan Cruz - August 21, 2026

Victor Manuel Romero Olivas - A# [redacted]
August 28, 2026

Agosto 21 de 2026

A quien corresponda.

yo Jonathan Cruz estoy escribiendo este documento para hacer de conocimiento a las instituciones pertinentes que yo conozco a Victor Romero Olivas desde hace aproximadamente 14 años yo soy propietario de un negocio de barbería el cual lleva por nombre Johnnys Barber Shop LP ubicado en 619 N Murray Blvd, Colorado Springs Co 80915, en este periodo de tiempo que llevo una amistad con el senor victor y que soy su barbero por este tiempo de 14 anos el senor siempre se ha mostrado respetuoso puntual en los tiempos que dice y responsable, he conocido cada una de las ocupaciones de el por lo tanto puedo contar que el anterior mente se dedicaba a la construcción de viviendas y tenia personal a su cargo puesto que él tenía en aquel entonces una compania la cual llevaba por nombre ROOV CONTRUCCION con en el paso del tiempo el cambio su ocupacion y se convirtió en propietario de ua grua donde actualmente ha trabajado y ha seguido todos los requerimientos que se necesitan como abrir una nueva compania para poder laborar en este negocio y estoy conciente que ha realizado toda la documentacio pertinente asi como tambie ha pagado todos los permisos que sete negocio require, tambien puedo testificar que el mantiene una relacion con su hijo Victor JR a quien tambien conozco desde pequeno y mantengo una relacion cercana he tenido la oportunidad de ver la relacion que lleva como padre he hijo y puedo ver el carino que ellos dos se tienen, en resumen conozco a Victor como un hombre trabajador, inteligente y responsable y en repetidas ocaciones he sido testigo de como ayuda a las personas cuando estas necesitan ayuda es admirable como a Victor o le importan las inclemencias del clima por ayudar a alguin mas y he visto poner e peligro su vida e la carretera para proteger la vida de alguien mas sin mas por el momento quedo ante ustedes para cualquier acraracion o duda dejando mis datos a continuacion.

Jonathan Cruz



EXHIBIT G

Declaration / Support Letter of Jennifer Nayelli Olivas

Victor Manuel Romero Olivas - A# [redacted]

August 28, 2026

To Whom It May Concern,

I, Jennifer Nayelli Olivas, am writing this letter to formally support my uncle, Mr. Víctor Manuel Romero Olivas, whom I have known my entire life. I can attest without reservation that he is an honest, hardworking, joyful, and community-minded individual who consistently helps those around him. Out of personal and safety concerns, he relocated to Colorado Springs, USA, and I am aware that he initiated a process with immigration to regularize his status in 2014.

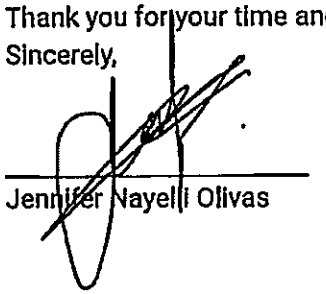
It is deeply surprising to learn of his recent difficulties with Immigration and Customs Enforcement (ICE). My uncle is a responsible and exemplary member of his community. He successfully operates a towing company, works in construction, complies with his fiscal duties by paying taxes, holds a valid driver's license, maintains bank accounts, and possesses an excellent credit history. Furthermore, he frequently visits our family in El Paso, Texas, demonstrating his close family ties.

Most importantly, he is a dedicated father who lives with his son in Colorado Springs and is fully involved in his upbringing, care, and well-being. Due to his upright lifestyle and compliance with civic duties, I had always believed he was fully documented in the country.

Mr. Romero Olivas is a man of integrity who has never had issues with the law. He is a positive, socially responsible person who contributes meaningfully to American society. I respectfully urge you to consider his exceptional character, his deep family roots, and his contributions to his community when reviewing his case.

Thank you for your time and consideration.

Sincerely,



Jennifer Nayelli Olivas

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

VICTOR MANUEL ROMERO OLIVAS, Petitioner, Pro Se

v.

WARDEN / FACILITY ADMINISTRATOR, et al., Respondents

Case No. _____

PROOF / CERTIFICATE OF SERVICE

I, Victor Manuel Romero Olivas, declare that on August 28, 2026, I placed true and correct copies of the Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241, the Emergency Motion, and the accompanying exhibits in the United States mail, postage prepaid, addressed as follows:

1. Warden / Facility Administrator
Petitioner's current ICE detention facility
Vinton / El Paso area, Texas
Exact facility name and street address presently unconfirmed.

2. ICE Enforcement and Removal Operations
El Paso Field Office Director
11541 Montana Ave., Suite E
El Paso, TX 79936

3. Civil Process Clerk
United States Attorney's Office
Western District of Texas
700 E. San Antonio, Suite 200
El Paso, TX 79901

4. Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530-0001

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

Executed on: August 28, 2026

El Paso, Texas



VICTOR MANUEL ROMERO OLIVAS
Petitioner, Pro Se
A# [redacted]
Current ICE detention: Vinton / El Paso area, Texas