JUDGE KATHLEEN CARDONE

FILED

UNITED STATES DISTRICT COURT

for the

EL PASO, TEXAS

AUG 31 2026

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

CRISTIAN MARDOQUEO MEJIA-AJTUM

Petitioner

v.

WARDEN, EL PASO PROCESSING CENTER,

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

Case No. EP26CV2254
(Supplied by Clerk of Court)

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

Personal Information

1. (a) Your full name: CRISTIAN MARDOQUEO MEJIA-AJTUM

   (b) Other names you have used: Crisitian Mejia

2. Place of confinement:

   (a) Name of institution: EL PASO PROCESSING CENTER

   (b) Address: 8915 MONTANA AVE.NAEL PASO, TX 79925

   (c) Your identification number: [redacted]

3. Are you currently being held on orders by:

   ☑ Federal authorities ☐ State authorities ☐ Other - explain:

4. Are you currently:

   ☐ A pretrial detainee (waiting for trial on criminal charges)

   ☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime

   If you are currently serving a sentence, provide:

   (a) Name and location of court that sentenced you:

   (b) Docket number of criminal case:

   (c) Date of sentencing:

   ☑ Being held on an immigration charge

   ☐ Other *(explain)*:

Decision or Action You Are Challenging

5. What are you challenging in this petition:

☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

☐ Pretrial detention

☑ Immigration detention

☐ Detainer

☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)

☐ Disciplinary proceedings

☐ Other *(explain)*: _____

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: United States Department of Homeland Security U.S. Immigration and Customs Enforcement El Paso Processing CenterEl Paso, Texas

(b) Docket number, case number, or opinion number: A# [redacted]

(c) Decision or action you are challenging *(for disciplinary proceedings, specify the penalties imposed)*: Petitioner challenges his continued civil immigration detention under 8 U.S.C. § 1225(b)(2)(A), as applied to him, because he remains detained without a constitutionally adequate individualized custody redetermination process to determine whether his continued detention remains necessary. Petitioner contends that; (see Ademdum Page)

(d) Date of the decision or action: 08/07/2026

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☐ Yes ☑ No

(a) If "Yes," provide:

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

(2) Date of filing: _____

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

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not appeal: Petitioner did not pursue an administrative appeal because the constitutional claim presented in this Petition challenges the legality of Petitioner's continued detention under the Due Process Clause of the Fifth Amendment and the absence (Continue see Addendum page

8. **Second appeal**

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

☐ Yes ☑ No

(a) If "Yes," provide:

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

(2) Date of filing:

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

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not file a second appeal: No first administrative appeal was filed. For the reasons stated in Question 7, Petitioner elected to seek federal habeas corpus review of his Fifth Amendment Due Process claim pursuant to 28 U.S.C. § 2241(c)(3).

9. **Third appeal**

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

☐ Yes ☑ No

(a) If "Yes," provide:

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

(2) Date of filing:

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

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not file a third appeal: No prior administrative appeal was pursued. Petitioner instead seeks federal habeas corpus review of the legality and constitutionality of his continued civil immigration detention.

10. **Motion under 28 U.S.C. § 2255**

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

☐ Yes ☑ No

If "Yes," answer the following:

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

☐ Yes ☐ No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

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

☐ Yes ☑ No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

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

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☑ Yes ☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: 07/21/2026

(b) Date of the removal or reinstatement order:

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

☐ Yes ☑ No

If "Yes," provide:

(1) Date of filing:

(2) Case number:

(3) Result:

(4) Date of result:

(5) Issues raised:

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

☐ Yes ☑ No

If "Yes," provide:

(1) Name of court:

(2) Date of filing:

(3) Case number:

(4) Result:

(5) Date of result:

(6) Issues raised:

12. **Other appeals**

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

☑ Yes ☐ No

If "Yes," provide:

(a) Kind of petition, motion, or application: Motion ror bond Redetermination

(b) Name of the authority, agency, or court: Executive Office for Immigration Review, Immigration Court

(c) Date of filing: 07/20/2026

(d) Docket number, case number, or opinion number: A# [redacted]

(e) Result: No action

(f) Date of result: 08/07/2026

(g) Issues raised: Petitioner's eligibility for release from immigration detention, his lack Petitioner's eligibility for release from immigration detention, his lack community, lack of flight risk, family and community ties, employment, sponsor, pending immigration relief, and ability to comply with all conditions of release.

Grounds for Your Challenge in This Petition

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

GROUND ONE: FIFTH AMENDMENT PROCEDURAL DUE PROCESSegal Basis: Due Process Clause Clause of the Fifth Amendment; 28 U.S.C. § 2241(c)(3); as-applied challenge to continued civil immigration detention under 8 U.S.C. § 1225(b)(2)(A).

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

Petitioner remains in civil immigration detention without a constitutionally adequate individualized custody redetermination process. Petitioner has not received a meaningful individualized determination, based upon his ave strong family and community ties, and I have a stable residence and sponsor available if I am released present circumstances, of whether his continued physical detention remains necessary because he currently presents a danger to the community or a risk of flight. Petitioner has no criminal record, has strong family and community ties in the United States, has a stable residence and sponsor available; (Continue Addendum page)

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

☐ Yes ☑ No

GROUND TWO: Petitioner presently asserts the Fifth Amendment Due Process claim stated in Ground One.

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

N/A

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

☐ Yes ☑ No

GROUND THREE:

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

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

☐ Yes ☑ No

GROUND FOUR:

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

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

☐ Yes ☑ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: Petitioner did not pursue a further administrative appeal because the ground raised in this Petition present constitutional challenge under the Due Process Clause of the Fifth Amendment to the legality of Petitioner's continued physical detention and the absence of a constitutionally adequate individualized custody redetermination process. Petitioner seeks federal habeas corpus relief pursuant to 28 U.S.C. § 2241(c)(3). (See Addendum page)

Request for Relief

15. State exactly what you want the court to do: See attached pages entitled: "Attachment to Question 15

Declaration Under Penalty Of Perjury

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

08/27/2026

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

Date: 8/27/26

Cristian Mejia

Signature of Petitioner

Signature of Attorney or other authorized person, if any

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241
CRISTIAN MARDOQUEO MEJIA-AJTUM
Petitioner, Pro Se
A# [redacted]
El Paso Processing Center
8915 Montana Avenue
El Paso, Texas 79925

ADDENDUM PAGE:

6. PROVIDE MORE INFORMATION ABOUT THE DECISION OR ACTION YOU ARE CHALLENGING

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):

...the continued deprivation of his physical liberty without adequate individualized procedural safeguards violates the Due Process Clause of the Fifth Amendment. This Petition challenges only the legality and constitutionality of Petitioner's detention and does not seek review of the merits of his removal proceedings.

7. FIRST APPEAL

(b) If you answered "No," explain why you did not appeal:

... of a constitutionally adequate individualized custody redetermination process. Petitioner seeks federal habeas corpus relief pursuant to 28 U.S.C. § 2241(c)(3), including judicial review of the legality of his physical detention. The constitutional habeas claim and relief presented here are beyond the authority of the administrative immigration courts to finally adjudicate and grant through the administrative bond process. Petitioner therefore elected to seek habeas corpus review in the United States District Court.

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

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

... case providing him with every incentive to comply with all future proceedings. Nevertheless, Petitioner remains physically detained without meaningful individualized review of the continuing necessity of that detention.

14. IF THERE ARE ANY GROUNDS THAT YOU DID NOT PRESENT IN ALL APPEALS THAT WERE AVAILABLE TO YOU, EXPLAIN WHY:

...The constitutional habeas claim presented here and the judicial relief sought—including review of the legality of Petitioner's continued physical detention—are beyond the authority of the administrative immigration process to finally adjudicate and grant. Petitioner therefore seeks review of his continued detention in the United States District Court.

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

Petitioner respectfully requests that this Honorable Court grant his Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 and:

(1) determine that Petitioner's continued civil immigration detention without constitutionally adequate individualized procedures violates the Due Process Clause of the Fifth Amendment;

(2) order Respondents to provide Petitioner with a prompt, meaningful, and constitutionally adequate individualized custody redetermination process before a neutral decisionmaker to determine whether continued physical detention remains necessary based upon Petitioner's current individualized circumstances;

(3) require meaningful consideration of Petitioner's present risk of flight, danger to the community, family and community ties, stable residence, available sponsor, employment, pending immigration proceedings, and appropriate alternatives to continued physical detention;

(4) order Petitioner's release under reasonable conditions if Respondents fail to provide the constitutionally adequate process ordered by this Court within the period established by the Court; and

(5) grant such other and further relief as this Court deems just, lawful, and proper.

Petitioner expressly does not seek through this Petition review of the merits of his removal proceedings or adjudication of his application for immigration relief.

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

Respondent Name:
MEJIA-AJTUM, CRISTIAN MARDOQUEO

To:
Vega, Noel
7901 4th St N
#32484
St. Petersburg, FL 33702

A-Number:
[redacted]

Riders:
In Custody Redetermination Proceedings

Date:
08/07/2026

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

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

☑ Other:
No action.

M. P

Immigration Judge: PLETERS, MICHAEL 08/07/2026

Appeal: Department of Homeland Security: ☐ waived ☐ reserved
Respondent: ☐ waived ☐ reserved
Appeal Due:

Certificate of Service

This document was served:
Via: [M] Mail | [P] Personal Service | [E] Electronic Service | [U] Address Unavailable
To: [ ] Alien | [ ] Alien c/o custodial officer | [E] Alien atty/rep. | [E] DHS
Respondent Name : MEJIA-AJTUM, CRISTIAN MARDOQUEO | A-Number : [redacted]
Riders:
Date: 08/07/2026 By: Martinez, Sandy, Court Staff

Noel Vega, Esq.
Immigration Law Firm
7901 4th Street N #32484
St Petersburg Fl 33702
Tel: (786)531-8841
Email:noel@abogadovega.com

DETAINED

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

In the Matter of:	)	
	)	
Cristian Mardoqueo Mejia-Ajtum	)	**File No.:** A[redacted]
	)	
	)	
In Removal Proceedings	)	
	)	

Immigration Judge: TBD
Bond Hearing: TBD

MOTION FOR BOND REDETERMINATION

DETAINED

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

In the Matter of:	)	
	)	
Cristian Mardoqueo Mejia-Ajtum	)	**File No.:** A[redacted]
	)	
	)	
In Removal Proceedings	)	
	)	

MOTION FOR BOND REDETERMINATION

COMES NOW, Respondent, **Cristian Mardoqueo Mejia-Ajtum**, through his counsel Noel Vega, Esq., and respectfully moves this Honorable Court to schedule a Bond Redetermination Hearing at the earliest available date and, after consideration of the evidence, set a reasonable bond pursuant to INA § 236(a). In support thereof, Respondent states as follows:

1. Respondent is a **20-year-old native and citizen of Guatemala** currently detained at the El paso Camp East Montana. He last entered the United States without inspection on or about **April 28, 2021**, and has continuously resided in the United States for more than five years.

2. Respondent is eligible for release on bond pursuant to INA § 236(a). Respondent further respectfully submits for the Court's consideration the Eleventh Circuit's recent decision in Hernandez Alvarez v. Warden, addressing the distinction between INA §§ 235(b) and 236(a) and supporting an individualized bond determination for noncitizens apprehended after residing in the interior of the United States

3. Under **Matter of Guerra, 24 I&N Dec. 37 (BIA 2006)**, Respondent clearly establishes that he neither poses a danger to the community nor presents a risk of flight.

Respondent clearly meets both requirements for release:

- **No Criminal History.** Respondent has no arrests or criminal convictions of any kind, demonstrating that he poses no danger to the community.
- **Good Moral Character.** Respondent submits letters of support from family members and members of the community, including a United States citizen, attesting to his honesty, responsibility, and positive character.
- **Stable Employment.** Prior to his detention, Respondent maintained steady employment and established himself as a hardworking and reliable employee. His

employer has confirmed that Respondent's position will remain available upon his release, allowing him to immediately resume lawful employment and continue supporting his family.

- **Primary Financial Provider for His Household.** Respondent is the primary financial provider for his household, and including his four (4) siblings, three (3) of whom are U.S citizens, all of whom depend upon him for their basic necessities, includinghousing, food, clothing, transportation, and medical expenses. Prior to his detention, Respondent maintained steady employment and used his income to support his family. His continued detention has deprived his household of its principal source of financial support, placing the family under severe financial hardship. Respondent's immediate return to work upon release is essential to ensuring the financial stability and well-being of his U.S. citizen siblings.
- **Extraordinary Family Hardship.** One of Respondent's U.S. citizen siblings, [redacted] has been diagnosed with [redacted] Because Respondent is the family's primary financial provider, his continued detention has significantly impaired the family's ability to pay for transportation, medical appointments, treatment, medications, and other essential living expenses. These circumstances further demonstrate Respondent's exceptionally strong family ties, his sense of responsibility toward his family, and his compelling incentive to comply with all future immigration proceedings.
- **Valid Employment Authorization.** Respondent currently possesses a valid asylum-based Employment Authorization Document, reflecting his compliance with the immigration process and his ability to lawfully work while his immigration proceedings remain pending.
- **Pending Asylum Application.** Respondent has a pending application for asylum before the Immigration Court, providing every incentive to appear at all future hearings and comply with any conditions imposed by the Court.
- **Compliance with Immigration Proceedings.** Respondent has fully complied with his immigration obligations while his asylum application has remained pending, including maintaining valid employment authorization and participating in the immigration process. His history demonstrates that he respects the legal process and will continue appearing for all future hearings if released.
- **Strong Community Ties and Stable Residence.** Upon release, Respondent will reside at [redacted] with his mother, stepfather, and siblings. He also has the support of a lawful permanent resident family friend who has committed to assisting him with housing, transportation, and ensuring his appearance at all future immigration proceedings.

4. Respondent is not subject to mandatory detention under INA § 236(c), is not a threat to national security, and presents no circumstances warranting continued detention. Respondent's family is prepared to immediately post any bond set by the Court and will ensure his continued compliance with all future hearings and reporting requirements.
5. Given Respondent's lack of any criminal history, his exceptionally strong family ties, his role as the primary financial provider for his household and four siblings, three of whom are United States citizens, his stable employment, valid employment authorization, pending asylum application, and reliable support network, Respondent presents neither a

danger to the community nor a risk of flight. His immediate family depends upon him not only for their financial support but also for the continued care of his medically vulnerable U.S. citizen sibling. Accordingly, the statutory minimum bond is sufficient to ensure his appearance at all future proceedings.

6. To assist the Court in scheduling this matter, undersigned counsel respectfully advises that counsel has previously scheduled court appearances and federal agency proceedings on the following dates: August 6, 2026; August 10, 2026; August 12, 2026; August 18, 2026; August 19, 2026; and August 26, 2026. Respondent respectfully requests that, if practicable, the scheduled hearing be set on a date other than those listed above.

WHEREFORE, Respondent respectfully requests that this Honorable Court schedule a Bond Redetermination Hearing at the earliest available date and, after consideration of the evidence presented, set bond in the statutory minimum authorized by law, **$1,500**, or, in the alternative, in such reasonable amount as the Court deems just and proper, and grant such other relief as justice requires.

Respectfully submitted by:

Dated:07/23/2026

Noel Vega, Esq.
Abogado Vega LLC
7901 4th Street N #32484
St Petersburg Fl 33702
Tel: (786)531-8841
Email:noel@abogadovega.com

Attorney for Respondent: **Cristian Mardoqueo Mejia-Ajtum A#** [redacted]

MOTION FOR BOND REDETERMINATION

Cristian Mardoqueo Mejia-Ajtum [redacted]

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Proposed Order.

Certificate of Service

U.S. Department of Justice
Executive Office for Immigration Review
Immigration Court

OMB#1125-0006
Notice of Entry of Appearance as Attorney or Representative Before the Immigration Court

(Type or Print)
NAME AND ADDRESS OF REPRESENTED PARTY

Christian M Mejia Ajtum
(First) (Middle Initial) (Last)

[redacted]
(Number and Street) (Apt. No.)

[redacted] FL [redacted]
(City) (State) (Zip Code)

A-NUMBER
(Provide Alien ("A") number of the party represented in this case.)
[redacted]

Entry of appearance for
(please check one of the following):

- ☐ All proceedings
- ☑ Custody and bond proceedings only
- ☐ All proceedings other than custody and bond proceedings

Attorney or Representative (please check one of the following):

☑ I am an attorney eligible to practice law in, and a member in good standing of, the bar of the highest court(s) of the following states(s), possession(s), territory(ies), commonwealth(s), or the District of Columbia (use additional space on reverse side if necessary), and I am not subject to any order disbarring, suspending, enjoining, restraining or otherwise restricting me in the practice of law in any jurisdiction (if subject to such an order, do not check this box and explain on reverse).

Full Name of Court Puerto Rico Bar Number (if applicable) 23553

☐ I am a representative accredited to appear before the Executive Office for Immigration Review as defined in 8 C.F.R. § 1292.1(a)(4) with the following recognized organization: N/A

☐ I am a law student or law graduate of an accredited U.S. law school as defined in 8 C.F.R. § 1292.1(a)(2).

☐ I am a reputable individual as defined in 8 C.F.R. § 1292.1(a)(3) and I am appearing without direct or indirect renumeration. I am providing further information in the Additional Information box below.

☐ I am an accredited foreign government official, as defined in 8 C.F.R. § 1291.1(a)(5), from N/A (country).

☐ I am a person who was authorized to practice on December 23, 1952, under 8 C.F.R. § 1292.1(b).

Attorney or Representative (please check one of the following):

☐ I hereby enter my appearance as attorney or representative for, and at the request of, the party named above.

☐ EOIR has ordered the provision of a Qualified Representative for the party named above and I appear in that capacity.

I have read and understand the statements provided on the reverse side of this form that set forth the regulations and conditions governing appearances and representations before the Immigration Court. By signing this form, I consent to publication of my name and any findings of misconduct by EOIR, should I become subject to any public discipline by EOIR pursuant to the rules and procedures at 8 C.F.R. 1003.101 *et seq.* I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

SIGNATURE OF ATTORNEY OR REPRESENTATIVE	EOIR ID NUMBER	DATE
X [signature]	EE160382	07/20/2026

NAME OF ATTORNEY OR REPRESENTATIVE, ADDRESS, FAX & PHONE NUMBERS, & EMAIL ADDRESS

Name: Noel Vega
(First) (Middle Initial) (Last)

Law Firm/Organization Abogado Vega LLC

Address: 7901 4th Street N 32484
(Number and Street)

St. Petersburg FL 33702
(City) (State) (Zip Code)

Telephone: 7865418841 Facsimile: _____ Email: noel@abogadovega.com

☐ Check here if new address

Indicate Type of Appearance: You must designate primary or non-primary unless you are appearing in an "on behalf of" capacity for another attorney for a specific hearing. Only the primary attorney/representative will receive mailings from the Immigration Court. All attorneys/representatives regardless of type of appearance are practitioners of record and are individually responsible as representatives for the respondent. Circumstances may arise that require the Immigration Court to designate a primary and/or switch service of mailings from the primary to a non-primary.

☑ Primary Attorney/Representative ☐ Non-Primary Attorney/Representative

☐ On behalf of _____ (Attorney's Name) for the following hearing: _____ (Date)

I am providing pro bono representation. Check one: ☐ yes ☑ no

Proof of Service

I (Name) Noel Vega, Esq. mailed, emailed or delivered a copy of this Form EOIR-28 on (Date) 07/20/2026

to the DHS (U.S. Immigration and Customs Enforcement – ICE) at _____

☑ No service needed. I electronically filed this document, and the opposing party is participating in ECAS.

X _____

Signature of Person Serving

APPEARANCES - A practitioner of record is authorized to appear on behalf of a respondent, to file documents on behalf of a respondent, and to accept service of process of all documents filed in the proceedings before the Immigration Court. *See* 8 C.F.R. § 1003.17(a). An attorney or Accredited Representative (with full accreditation) must register with the EOIR eRegistry in order to practice before the Immigration Court (see 8 C.F.R. § 1292.1(f)). Registration must be completed online on the EOIR website at www.justice.gov/eoir. To perform the functions of and become the practitioner of record, the practitioner must file a separate Form EOIR-28 for each represented party in each case before an Immigration Judge (see 8 C.F.R. § 1003.17). A Form EOIR-28 shall be filed either as an electronic form, or as a paper form, as appropriate (for further information, please see the Immigration Court Practice Manual, which is available on the EOIR website at www.justice.gov/eoir). The attorney or representative must check the box indicating whether the entry of appearance is for custody and bond proceedings only, for all proceedings other than custody and bond, or for all proceedings including custody and bond. When an appearance as a practitioner of record is made by a person acting in a representative capacity, his/her personal appearance or signature constitutes a representation that, under the provisions of 8 C.F.R. part 1003, he/she is authorized and qualified to represent individuals and will comply with the EOIR Rules of Professional Conduct in 8 C.F.R. § 1003.102. Thereafter, substitution or withdrawal may be permitted upon the approval of the Immigration Judge of a request by the attorney or practitioner of record in accordance with 8 C.F.R. § 1003.17(b). Please note that although separate appearances in custody and non-custody proceedings are permitted, appearances for limited purposes within those proceedings – other than for document assistance to an unrepresented or pro se respondent – are not permitted. *See* 8 C.F.R. § 1003.2(g)(1), 1003.38(g)(2); *see also Matter of Velasquez*, 19 I&N Dec. 377, 384 (BIA 1986). A Form EOIR-61, not a Form EOIR-28, is required for the entry of a limited appearance for document assistance on an application, brief, motion, or other document before the Immigration Court. A separate appearance form (Form EOIR-27) must be filed with an appeal to the Board of Immigration Appeals (see 8 C.F.R. § 1003.38(g)). Note: Attorneys and Accredited Representatives (with full accreditation) must first update their address in eRegistry before filing a Form EOIR-28 that reflects a new address.

FREEDOM OF INFORMATION ACT - This form may not be used to request records under the Freedom of Information Act or the Privacy Act. The manner of requesting such records is in 28 C.F.R. §§ 16.1-16.11 and appendices. For further information about requesting records from EOIR under the Freedom of Information Act, see How to File a Freedom of Information Act (FOIA) Request With the Executive Office for Immigration Review, available on EOIR's website at https://www.justice.gov/eoir.

PRIVACY ACT NOTICE - The information requested on this form is authorized by 8 U.S.C. §§ 1229(a), 1362 and 8 C.F.R. § 1003.17 in order to enter an appearance to represent a party before the Immigration Court. The information you provide is mandatory and required to enter an appearance. Failure to provide the requested information will result in an inability to represent a party or receive notice of actions in a proceeding. EOIR may share this information with others in accordance with approved routine uses described in EOIR's system of records notice, EOIR-001, Records and Management Information System, 69 Fed. Reg. 26,179 (May 11, 2004), or its successors and EOIR-003, Practitioner Complaint-Disciplinary Files, 64 Fed. Reg. 49237 (September 1999). Furthermore, the submission of this form acknowledges that an attorney or representative will be subject to the disciplinary rules and procedures at 8 C.F.R. 1003.101*et seq.*, including, pursuant to 8 C.F.R. §§ 292.3(h)(3), 1003.108(c), publication of the name of the attorney or representative and findings of misconduct should the attorney or representative be subject to any public discipline by EOIR.

CASES BEFORE EOIR - Automated information about cases before EOIR is available by calling (800) 898-7180 or (304) 625-2050 or by checking online at https://acis.eoir.justice.gov. For further information, please see the Immigration Court Practice Manual, which is available on the EOIR website at www.justice.gov/eoir.

ADDITIONAL INFORMATION: If you are filing this form as a reputable individual as defined in 8 C.F.R. § 1292.1(a)(3), please provide a statement below how you meet that criteria, including that you are appearing on an individual basis at the request of the person entitled to representation and describing your pre-existing relationship or connection to that person.

Under the Paperwork Reduction Act, a person is not required to respond to a collection of information unless it displays a valid OMB control number. We try to create forms and instructions that are accurate, can be easily understood, and which impose the least possible burden on you to provide us with information. The estimated average time to complete this form is six (6) minutes. If you have comments regarding the accuracy of this estimate, or suggestions for making this form simpler, you can write to the Executive Office for Immigration Review, Office of the General Counsel, 5107 Leesburg Pike, Suite 2600, Falls Church, Virginia 22041.

AFFIDAVIT OF EDITH ESPERANZA GOMEZ ZUNIGA

AFFIDAVIT OF SUPPORT, GOOD MORAL CHARACTER, AND PHYSICAL PRESENCE

I, **Edith Esperanza Gomez Zuniga**, being first duly sworn, hereby declare under penalty of perjury under the laws of the United States that the following statements are true and correct:

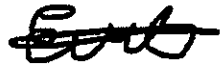
1. My name is **Edith Esperanza Gomez Zuniga**. I am over eighteen (18) years of age and competent to make this affidavit.
2. I am a **Lawful Permanent Resident of the United States** and reside in Homestead, Florida.
3. I have personally known **Cristian Mardoqueo Mejia Ajtum** for several years. During that time I have developed a close relationship with him and have had numerous opportunities to observe his character and conduct.
4. Cristian has always demonstrated that he is an honest, respectful, hardworking, and responsible individual. He has consistently treated me and everyone around him with kindness and respect.
5. Throughout the time I have known Cristian, I have never known him to be a violent or dangerous person. Instead, he has always shown compassion toward others and has been willing to help family members, friends, and members of the community whenever needed.
6. Cristian has continuously resided in the United States during the time I have known him. I have personally observed his physical presence in this country because we have maintained regular contact and I have seen him living and working in our community.
7. I understand that Cristian is currently detained by Immigration and Customs Enforcement (ICE). If he is released from custody, **I am willing to accept full responsibility for him.**
8. Specifically, I agree to:

- Provide Cristian with a stable residence.
- Ensure he attends every immigration hearing and ICE appointment.
- Assist him with transportation whenever necessary.
- Help him comply with every condition imposed by the Immigration Court or ICE.
- Provide emotional and financial support while his immigration proceedings remain pending.

9. I have every confidence that Cristian will comply with all immigration requirements. Based upon my personal knowledge of him, I do not believe he presents any danger to the community nor any risk of flight.
10. I respectfully ask the Immigration Judge and the Department of Homeland Security to consider his excellent moral character, his ties to the community, and my willingness to supervise him should he be released.

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

Executed on July 22, 2026.



Edith Esperanza Gomez Zuniga



AFFIDAVIT OF YOSVANI LEY

AFFIDAVIT OF EMPLOYMENT, GOOD MORAL CHARACTER, AND PHYSICAL PRESENCE

I, Yosvani Ley, being first duly sworn, hereby declare under penalty of perjury as follows:

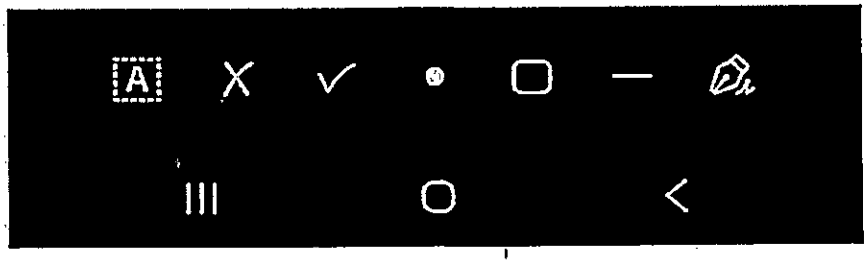
1. My name is Yosvani Ley. I am over eighteen years of age and competent to make this affidavit.
2. I reside in the State of Florida.
3. I have personally known Cristian Mardoqueo Mejia Ajtum for several years.
4. Cristian has worked for me as my employee. During that time I have had the opportunity to observe him on a daily basis.
5. Cristian has consistently proven himself to be an honest, dependable, respectful, and hardworking employee. He arrives on time, performs his duties responsibly, follows instructions, and treats customers and coworkers with respect.
6. I have never known Cristian to engage in dishonest conduct or behavior that would cause me to question his integrity. He has earned my trust through his dedication and work ethic.
7. Because he has worked for me on a regular basis, I can personally attest that he has maintained a continuous physical presence in the United States during the period that I have known him.
8. Cristian has always demonstrated good moral character by respecting others, obeying workplace rules, and maintaining a positive attitude despite difficult circumstances.
9. If Cristian is released from immigration custody, I am prepared to continue employing him immediately. His employment will provide him with financial stability and will further ensure that he continues complying with all immigration requirements.
10. Based upon my personal knowledge of Cristian, I believe he is a valuable member of our community, poses no danger to the public, and will appear at every court hearing and ICE appointment if released.

I respectfully request that the Immigration Judge consider this affidavit in evaluating Cristian's character and community ties.

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

Executed on _____, 2026.

Yosvani Ley
Email:
Phone:



10:41 96

AFFIDAVIT OF WILLIAM ELIAS HERNANDEZ CARRILLO

AFFIDAVIT OF GOOD MORAL CHARACTER

I, William Elias Hernandez Carrillo, being first duly sworn, declare under penalty of perjury pursuant to the laws of the United States that the following is true and correct:

1. My name is William Elias Hernandez Carrillo. I am a citizen of the United States, over the age of eighteen, and competent to make this affidavit.
2. I have personally known **Cristian Mardoqueo Mejia Ajtum** for several years, and during that time I have had numerous opportunities to observe his conduct and character.
3. Cristian has consistently demonstrated honesty, integrity, and respect toward others. He is a hardworking young man who has always tried to support himself through lawful employment.
4. Throughout the time I have known him, he has treated everyone with dignity and respect. He is peaceful, responsible, and dependable.
5. I have never known Cristian to engage in violent behavior or conduct that would make him a danger to our community. Instead, he has always shown compassion, humility, and a willingness to help others whenever possible.
6. Cristian is the type of person who values family, employment, and personal responsibility. His reputation among those who know him is that of a person with excellent moral character.
7. Based upon my personal knowledge, I firmly believe Cristian will comply with every order of the Immigration Court and every reporting requirement imposed by ICE if released.
8. I respectfully request that this affidavit be considered as evidence of Cristian's outstanding moral character and strong ties to the community.

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

Executed on _____, 2026.

William Elias Hernandez Carrillo

AFFIDAVIT OF PEDRO SEVILLA GOMEZ

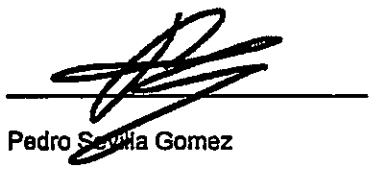
AFFIDAVIT OF GOOD MORAL CHARACTER

I, **Pedro Sevilla Gomez**, being first duly sworn, hereby declare:

1. I am a Lawful Permanent Resident of the United States and am over eighteen years of age.
2. I have personally known **Cristian Mardoqueo Mejia Ajtum** for several years.
3. During our friendship, I have come to know Cristian as an honest, respectful, hardworking, and trustworthy individual.
4. Cristian has always shown respect toward his family, friends, employers, and members of the community. He is someone who avoids problems and prefers to focus on work and supporting himself.
5. I have never witnessed Cristian engage in violent conduct or behavior that would make him a threat to anyone.
6. His reputation within our community is that of a responsible and dependable young man who consistently demonstrates kindness and integrity.
7. I sincerely believe Cristian possesses excellent moral character and deserves the opportunity to continue his life in the United States.
8. I am confident he will appear at every immigration hearing and comply with every condition imposed upon him if released.

I declare under penalty of perjury that these statements are true and correct.

Executed on July 22, 2026.



Pedro Sevilla Gomez

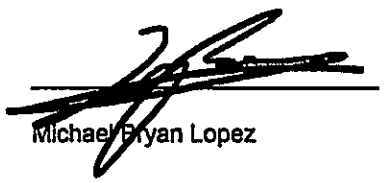
AFFIDAVIT OF GOOD MORAL CHARACTER OF MICHAEL BRYAN LOPEZ

I, **Michael Bryan Lopez**, being duly sworn, declare as follows:

1. I am a citizen of the United States, over eighteen years of age, and competent to make this affidavit.
2. I have personally known **Cristian Mardoqueo Mejia Ajtum** for several years.
3. During that time I have had the opportunity to know Cristian well and observe his daily conduct.
4. Cristian has always been respectful, honest, hardworking, and responsible. He treats people with kindness regardless of their background and has always conducted himself with integrity.
5. I have never known Cristian to be aggressive, violent, or disrespectful toward anyone. His character reflects honesty, humility, and a sincere desire to live peacefully and work hard.
6. Cristian is someone who values employment, family, and community. He has consistently demonstrated that he is a reliable and trustworthy person.
7. Based upon my personal observations, I believe Cristian poses absolutely no danger to the community and would fully comply with any conditions imposed by the Immigration Court or Immigration and Customs Enforcement.
8. I respectfully ask that this affidavit be considered in evaluating Cristian's good moral character.

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

Executed on July 22, 2026.



Michael Bryan Lopez

Letter of Support for Cristian Mejia (English Translation)

Homestead, Florida
July 19, 2026

Re: CRISTIAN MEJIA

I am **Pastor Julio Aguilar Sales** of **The Church of God New Jerusalem #32**, located at 33521 S. Dixie Highway, Florida City, FL 33034.

Through this letter, I wish to state the following: I have known **Cristian Mejia** since July 2025, when he became a member of our church. I can sincerely say that he is a person who is well respected and appreciated within our congregation and community. He is respectful, responsible, and possesses strong moral character.

Cristian is a good young man and a kind, compassionate individual. For these reasons, our church wholeheartedly supports him. We respectfully ask that he be given another opportunity to remain in the United States.

If you require any additional information, please feel free to contact me at [redacted].

Sincerely,

Julio Aguilar Sales
Pastor
The Church of God New Jerusalem #32

AFFIDAVIT OF SANDRA MEJIA AJTUM

I, **Sandra Mejias**, being first duly sworn, hereby declare under penalty of perjury under the laws of the United States that the following statements are true and correct to the best of my knowledge:

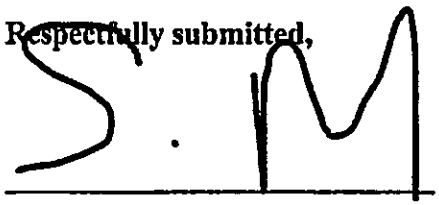
1. My name is **Sandra Mejias.** I am over the age of eighteen and competent to make this affidavit. I am the mother of **Cristian Mardoqueo Mejia Ajtum.**
2. I make this affidavit in support of my son's request for release from the custody of U.S. Immigration and Customs Enforcement (ICE).
3. Cristian has always been a loving, respectful, and responsible son. He is a person of good moral character who has consistently worked hard to support our family.
4. Cristian is the **primary financial provider** for our household. His income helps pay for our rent, food, utilities, clothing, transportation, and many other daily living expenses. Without his financial support, it has become extremely difficult for our family to meet our basic needs.
5. Cristian also plays a vital role in helping care for his siblings three (3) **United States citizensiblings.** In addition to providing financial support, he assists with their daily needsand helps ensure they are cared for while I work and attend to family responsibilities.
6. One of Cristian's United States citizen siblings, [redacted] requires continuous medical treatment and follow-up with multiple medical specialists. Cristian has always helped our family pay for transportation, medications, and other expenses related to [redacted] medical care. Since Cristian has been detained, our family has experienced significant financial hardship, making it much more difficult to provide for [redacted] medical needs and the needs of the entire household.
7. Cristian's continued detention has placed an enormous emotional and financial burden on our family. We miss him every day, and his absence has affected the stability of our home and the well-being of his younger siblings.
8. If Cristian is released from ICE custody, our family will continue to support him in every way possible. We will ensure that he has a stable home and the resources necessary to comply with all conditions of his release.
9. I understand the importance of these immigration proceedings. I personally promise that I will ensure Cristian attends **every Immigration Court hearing, every ICE appointment, and any other appointments required by the Department of Homeland Security or the Immigration Court.** I will remind him of all scheduled hearings, assist with transportation if necessary, and make certain that he fully complies with every requirement imposed by the Court or ICE.
10. Based on my knowledge of Cristian, I firmly believe that he **is not a danger to the community and does not present a flight risk.** He has strong family ties, meaningful responsibilities, and every incentive to continue appearing for all immigration proceedings so he may remain with and continue supporting his family

11. I respectfully ask this Honorable Court to grant Cristian's request for release from ICE custody so that he may return home, continue supporting our family, assist with the care of his United States citizen siblings, particularly [redacted] and continue complying with all immigration requirements.

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

Executed on this _22_ day of __July, 2026.

Respectfully submitted,



Sandra Mejias

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
MIAMI FLORIDA

Cristian Mardoqueo Mejia-Ajtum [redacted]

ORDER OF THE IMMIGRATION JUDGE

Upon consideration of the **Motion for Bond Redetermination,** it is HEREBY ORDERED that the Motion be ☐ **GRANTED** ☐ **DENIED** because:

- ☐ DHS does not oppose the motion.
- ☐ The Respondent does not oppose the motion.
- ☐ A response to the motion has not been filed with the Court.
- ☐ Good cause has been established for the motion.
- ☐ The Court agrees with the reasons stated in the opposition to the motion.
- ☐ The motion is untimely per _____.
- ☐ Other:

Deadlines:

- ☐ The application(s) for relief must be filed by _____.
- ☐ The respondent must comply with DHS biometrics instructions by _____.

_____ _____

Date

Immigration Judge

Certificate of Service

This document was served by: [ ] Mail [ ] Personal Service

To: [ ] Alien [ ] Alien c/o Custodial Officer [ ] Alien's Atty/Rep [ ] DHS

Date: _____ By Court Staff: _____

Cristian Mardoqueo Mejia-Ajtum [redacted]

CERTIFICATE OF SERVICE

I, Noel Vegas Esq., certify that a true and correct copy of the foregoing Motion for Bond Redetermination was electronically filed with the Department of Homeland Security through the EOIR Courts and Appeals System (ECAS) which will automatically send service notifications to both parties that a new document has been filed with the Court today, July 23, 2026.

Respectfully Submitted:

Noel Vega, Esq.
Abogado Vega LLC
7901 4th Street N #32484
St Petersburg Fl 33702
Tel: (786)531-8841
Email:noel@abogadovega.com

Attorney for Respondent:
Cristian Mardoqueo Mejia-Ajtum [redacted]