

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

WILMER GARCIA RAMIREZ, et al.,)	
)	Case No. 1:18-cv-00508-RC
Plaintiffs,)	
)	
v.)	
)	
U.S. IMMIGRATION AND)	
CUSTOMS ENFORCEMENT (ICE), et al.,)	
)	
Defendants.)	
)	

Declaration of Imelda Maynard

I, Imelda Maynard, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am over 18 years old and competent to make this declaration.
2. This declaration is based on my personal knowledge and my review of our organization’s records regarding the clients detailed below.
3. I am the Director of Legal Services at Estrella del Paso. Estrella del Paso is an independent nonprofit organization that was founded in 1986 by the Catholic Diocese of El Paso and the U.S. Conference of Catholic Bishops. Estrella del Paso is the largest provider of free immigration legal services in West Texas and New Mexico.
4. Estrella del Paso runs an Unaccompanied Minors Program, through which our attorneys represent unaccompanied children in the custody of the Office of Refugee Resettlement (ORR).
5. Starting on October 1, 2025, I became aware of multiple unaccompanied minor clients who will turn 18 in the coming days (which we refer to as “aging out”) who are at imminent risk of being transferred to the custody of Immigration & Customs Enforcement (ICE) for

detention after age-out. This is despite having identified sponsor and no indication that they pose a flight risk or a danger to themselves or others. This represents a distinct departure from recent past practice, in which children in this situation, with sponsors and presenting no flight risk or danger, were routinely released to their sponsors upon age-out.

6. Through these cases I have also learned that ICE appears to have issued a new directive to detain unaccompanied children when they reach age 18.

7. I am using initials rather than my clients' full names to protect their privacy, particularly given their age. Where I have provided documents regarding each client, I have redacted personally identifying information for them and their sponsors. As a courtesy I have also redacted the names and contact information for ORR contractor employees (such as shelters) and ICE employees. The documents referenced herein are highly sensitive, so I have not attached all of them to this declaration as exhibits. I have unredacted copies of all documents referenced in this declaration on file and can provide them to the Court and Defendants if necessary.

Client E.G.G.L.

8. Estrella's client E.G.G.L. is an unaccompanied minor from Guatemala who is currently in ORR custody at a shelter called Compass Connections East El Paso. His 18th birthday is tomorrow, October 4, 2025.

9. Compass Connections created and provided to us a "Post 18 Safety Plan" for E.G.G.L. That Plan states that a sponsor has been identified for E.G.G.L., who has been verified as E.G.G.L.'s paternal uncle, who lives in Seattle, Washington.

10. The plan further states that

There have not been any concerns identified with releasing [E.G.G.L.] to his paternal uncle. [The uncle] has confirmed he is willing to purchase a bus ticket for [E.G.G.L.] to travel to Seattle, WA, if he is released on his own recognizance. The program has not identified any additional services that [E.G.G.L.] may require upon aging out. [E.G.G.L.]

is not a danger to the community nor is he a flight risk. The child has had no behavioral incidents while in care and has presented as stable.

11. On September 29, 2025, a judge in state court in Texas issued a predicate order making the findings necessary to establish E.G.G.L.'s eligibility for Special Immigrant Juvenile Status as defined in 8 U.S.C. § 1101(a)(27)(J). Our organization represents E.G.G.L. for purposes of his application for Special Immigrant Juvenile Status and plans to submit the Form I-360, Petition for Special Immigrant status, to U.S. Citizenship & Immigration Services (USCIS) in the coming days. If that petition is granted, E.G.G.L. will be eligible to adjust status to a permanent resident once a visa becomes available.

12. In the afternoon on October 2, 2025, a Case Manager at Compass Connections sent Estrella del Paso an email stating: "I would like to advise that we were notified today that [E.G.G.L.] was denied being released on his own recognizance."

13. On the morning of October 3, an attorney with Estrella del Paso, exchanged emails with the Lead Case Manager at Compass Connections. In those emails, the Lead Case Manager states that she received the following information from ICE's Field Office Juvenile Coordinator (FOJC) point of contact (POC):

On 10/01/2025, the El Paso Field Office received new Interim guidance from HQ on Age-Out Custody Determinations. Regarding Detention Authority for "Applicants for Admission", effective immediately it is the position of DHS that such aliens are subject to detention under IN § 235(b) and may not be released from ICE custody except by INA § 212(d)(5) parole. Parole may be granted on a case-by-case basis for "urgent humanitarian reasons" or "significant public benefit." ELP FOJC will continue to carefully evaluate UAC cases when making custody determinations. Once a custody determination is made and DHS/ICE decides to continue detention the Age Outs will be served an I-200 (Warrant of Arrest), camp space will be approved in one of our adult facilities, and transportation arrangements will be made by ELP FOJC for the day of Age Out. Due to the new Age Out interim Guidance both Compass Connections ELP upcoming Age Outs, [E.G.G.L.], [W.O.B.P., see below], will remain in custody and continue their removal proceedings."

14. On October 3 at 6:30 PM Mountain Time, Estrella staff was informed by email

from Deportation Officer Omar Alvarado that E.G.G.L. will be released on parole tomorrow rather than be detained.

Client E.O.B.M.

15. Estrella's client E.O.B.M. is an unaccompanied minor from Honduras who is currently in ORR custody through an organization called Upbring. His 18th birthday is next Thursday, October 9, 2025.

16. Upbring provided to us a "Post 18 Plan" for E.O.B.M. That Plan states E.O.B.M. designated his own age-out placement sponsor, a family friend living in Montgomery, Alabama. The Plan states: "Reason this placement services the child's best interests: This placement is in [E.O.B.M.] best interest as Edwin is a family friend from home country."

17. E.O.B.M.' Post 18 Plan further states: "An assessment whether the youth is a danger to self, the community, or risk of flight: **No**, the youth is not in danger to self, the community, or risk of flight." (*emphasis added*).

18. On September 18, 2025, a judge in state court in Texas issued a predicate order making the findings necessary to establish E.O.B.M.'s eligibility for Special Immigrant Juvenile Status as defined in 8 U.S.C. § 1101(a)(27)(J). Our organization represents E.O.B.M. for purposes of his application for Special Immigrant Juvenile Status and has submitted the Form I-360, Petition for Special Immigrant status to USCIS. If that petition is granted, E.O.B.M. will be eligible to adjust status to a permanent resident once a visa becomes available.

19. On October 1, 2025, staff at Estrella received an email from a Case Manager at Upbring, that included a thread of prior emails between Upbring and a FOJC in ICE's El Paso Field Office.

20. The email thread includes an email from the FOJC to Upbring dated September 30,

2025, stating “Please bring [E.O.B.M.] to Upbring (6585 Montana Avenue) on 10/1/2025 at 10 am so that I can serve the Order of Recognizance.” The following morning, the FOJC confirmed that he would be at Upbring that day to serve the Order of Recognizance. The Upbring Case Manager responded confirming she and E.O.B.M. would be present for the appointment.

21. A true and correct copy of the Order of Release on Recognizance and related documents served on E.O.B.M. that morning is attached to this declaration as **Exhibit A**. The documents are dated October 9, 2025, even though they were served on October 1, 2025. Ex A at 3–8. The final page, DHS Form I-286 (Notice of Custody Determination) includes a date and time stamp of 10/9/2025 at 8:46 PM. *Id.* at 8.

22. After the Order of Release on Recognizance was served, the same FOJC who had served the Order of Release on Recognizance emailed the Upbring Case Manager at 2:54 PM, stating: “As per new directive, [E.O.B.M.] will be detained by ICE upon release/age-out from ORR custody on 10/9/2025.” The FOJC sent another email at 4:09 PM, stating: “Correction: Case will be reviewed regarding release from ORR custody/detention before [E.O.B.M.] ages out on 10/9/2025.”

Client I.L.F.R.

23. Estrella’s client I.L.F.R. is an unaccompanied minor from Guatemala who is currently in ORR custody at CPLC Hummingbird House. He turns 18 tomorrow, October 4, 2025.

24. CPLC Hummingbird House provided a “Post-18 Plan” for I.L.F.R. That plan states I.L.F.R. designated his own age-out placement sponsor, his father, who lives in Ruskin, Florida. The Plan states: “The child’s father has agreed to purchase plane tickets and coordinate transportation in accordance with the discharge plan.” The Plan further states “Best Interest Determination: Placement with the father serves the child’s best interests by ensuring family

reunification, emotional support, and a safe, stable living environment.”

25. I.L.F.R.’s Post-18 Plan also states: “Risk Assessment: The child does not present a danger to self or others and does not pose a risk of flight.”

26. I.L.F.R. has been in ORR custody and care for less than five days. Due to his having recently arrived, our team has not been able to pursue any relief filings for the child. Based on our intake with I.L.F.R., we believe he could file an asylum claim as he expressed fear of harm if returned to his home country.

27. The morning of October 3, we received word from the lead case manager at the CPLC Hummingbird House shelter that I.L.F.R. was seen by a FOJC from the ICE El Paso Field Office I.L.F.R. was informed that he will be transferred to ICE custody upon aging out on October 4.

28. On October 3 at 7:33 PM Mountain Time, Estrella staff received an email from the case manager at CPLC Hummingbird House shelter that stated I.L.F.R. was provided an “Interim Notice Authorizing Parole Form,” based on this information we believe the child may be released on parole tomorrow.

Client W.O.B.P.

29. Estrella’s client W.O.B.P. is an unaccompanied minor from Guatemala who is currently in ORR custody at Compass Connections East El Paso. His 18th birthday is Sunday, October 5, 2025.

30. On October 3, our office, requested a copy of W.O.B.P.’s Post-18 plan. A copy of that plan was provided to us by Compass Connections. The Plan states: “The program has identified the current sponsor, [L.E.P.P.], as the placement for the child once he turns 18. [W.O.B.P.] is the alleged child’s mother, per BC trail. There have been no concerns identified

with releasing the child to his current sponsor. The child's current sponsor has confirmed she is willing to purchase a bus ticket for the child to travel to Nashville, TN, if he is released on his own recognizance. The program has not identified any additional services the child may require upon aging out. The child is not a danger to the community nor is he a flight risk. The child has had no behavioral incidents while in care and has presented as stable."

31. In the afternoon on October 2, 2025, a Case Manager at Compass Connections sent Estrella del Paso an email stating: "The request for Release on Recognizance (ROR) [for W.O.B.P.] as been reviewed and has been denied by the FOJC." A true and correct copy of that email is attached to this declaration as Exhibit B. On the morning of October 3, an attorney at Estrella del Paso asked for more information about the denial, and the Lead Case Manager at Compass Connections replied with the same information as was provided regarding the denial of release for E.G.G.L. Ex. B at 2.

32. Based on the foregoing, it is my understanding that W.O.B.P. will be taken into ICE custody in two days, on Sunday, October 5.

ICE Email

33. On October 3, 2025, Estrella received an email from a Lead Case Manager at CPLC Hummingbird House forwarding an email from an FOJC in the El Paso Field Office regarding ICE's new directive regarding custody of unaccompanied minors aging out. A true and correct copy of that email is attached to this declaration as **Exhibit C**. The email restates the same "interim guidance" information listed in the emails described above. Ex. C at 3.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

Executed on October 3, 2025 at El Paso, Texas.

A handwritten signature in black ink, appearing to read "Imelda Maynard". The signature is fluid and cursive, with a large initial "I" and "M".

Imelda Maynard, Esq.

Exhibit A

Appointment Confirmed:

Wednesday, November 5, 2025 07:00AM (CST)

Confirmation # FOAS1413593

Please keep this confirmation number for your records.

Selected Location:

MONTGOMERY ERO OFFICE (MGA)
500 INTERSTATE PARK DRIVE
MONTGOMERY, AL 36109

☎ 3342606305

✉ fnl-mdo-cap@ice.dhs.gov

Appointment Information:

👤 Name: [REDACTED]

🛖 Alien Number: [REDACTED]

🛖 Subject ID: [REDACTED]

🛖 Case ID: [REDACTED]

📌 Appointment Type: **Non-Detained Single**

Site Directions:

Second level, Suite 529 (Segundo nivel, Suite 529)

Site Instructions:

Ring the door bell. (Toca el timbre.)

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

ORDER OF RELEASE ON RECOGNIZANCE

File No. [REDACTED]

Name: [REDACTED]

Date: October 9, 2025

You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

- You must report for any hearing or interview as directed by Immigration and Customs Enforcement or the Executive Office for Immigration Review.
- You must surrender for removal from the United States if so ordered.
- You must report in (writing) (person) to Duty officer at _____ See I-831 _____ on 11/05/2025 07:00 as directed.

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

- You must not change your place of residence without first securing written permission from the officer listed above.
- You must not violate any local, State or Federal laws or ordinances.
- You must assist Immigration and Customs Enforcement in obtaining any necessary travel documents.
- Other: *Your release is contingent upon your enrollment and successful participation in an Alternatives to Detention (ATD) program as designated by the U.S. Department of Homeland Security. As part of the ATD program, you will be subject to electronic monitoring and may be subject to a curfew. Failure to comply with the requirements of the ATD program will result in a redetermination of your release conditions or your arrest and detention.*

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

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

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

[REDACTED], M2116E (A) SDDO
(Name and Title of ICE Official)

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

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

GONZALEZ, RICARDO

DO _____
(Signature of ICE Official Serving Order)

⊗ [REDACTED]
(Signature of Alien)

10/09/2025
Date

I hereby cancel this order of release because:

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

(Signature of ICE Official Cancelling Order)

Date

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

ORDER OF RELEASE ON RECOGNIZANCE
(ADDENDUM)

File No.: [REDACTED]

Name: B [REDACTED]

Date: October 9, 2025

- That you do not associate with known gang members, criminal associates, or be associated with any such activity.
- That you register in a substance abuse program within 14 days and provide ICE with written proof of such within 30 days. The proof must include the name, address, duration, and objectives of the program as well as the name of a counselor.
- That you register in a sexual deviancy counseling program within 14 days and provide ICE with written proof of such within 30 days. You must provide ICE with the name of the program, the address of the program, duration and objectives of the program as well as the name of a counselor.
- That you register as a sex offender, if applicable, within 7 days of being released, with the appropriate agency(s) and provide ICE with written proof of such within 10 days.
- That you do not commit any crimes while on this Order of Release on Recognizance.
- That you report to any parole or probation officer as required within 5 business days and provide ICE with written verification of the officer's name, address, telephone number, and reporting requirements.
- That you continue to follow any prescribed doctor's orders whether medical or psychological including taking prescribed medication.
- That you provide ICE with written copies of requests to Embassies or Consulates requesting the issuance of a travel document.
- That you provide ICE with written responses from the Embassy or Consulate regarding your request.
- Any violation of the above conditions will result in revocation of your employment authorization document.
- Any violation of these conditions may result in you being taken into ICE custody and you being criminally prosecuted.
- Other:

x [REDACTED]
(Signature of Alien)

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

**ORDER OF RELEASE ON RECOGNIZANCE
(OUT-PROCESSING CHECKLIST)**

Sex Offenders


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


Substance Abusers

- Probation/Parole Officer Notified
- Written Proof of Counseling

All Aliens

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

Completed By	
Deportation Officer: [REDACTED] 	Date 10/09/2025

Concurrence By	
Supervisory Detention and Deportation Officer: [REDACTED], M2118 E (A)SDDO 	Date 10/09/2025

U.S. Department of Homeland Security

Continuation Page for Form I-220A

Alien's Name [REDACTED]	File Number [REDACTED] Event No: EGT2512000022	Date October 9, 2025
LOCATION OF ICE OFFICE WHICH YOU REPORT TO ----- MONTGOMERY ERO OFFICE 500 INTERSTATE PARK DRIVE MONTGOMERY, AL 36109		
Signature [REDACTED] 	Title DO	

DEPARTMENT OF HOMELAND SECURITY
NOTICE OF CUSTODY DETERMINATION

Alien's Name: [REDACTED]

A-File Number: [REDACTED]

Date: 10/09/2025

Event ID: EGT2512000022

Subject ID: [REDACTED]

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

- Detained by the Department of Homeland Security.
- Released (check all that apply):
 - Under bond in the amount of \$ _____
 - On your own recognizance.
 - Under other conditions. [Additional document(s) will be provided.]

[REDACTED] M2118 E

 Name and Signature of Authorized Officer
 (A)SDDO

 Title

10/09/2025 8:46 PM

 Date and Time of Custody Determination
 ICE ERO EL PASO DETENTION FACILITY
 8915 MONTANA AVENUE EL PASO, TX 79925

 Office Location/Address

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

- I acknowledge receipt of this notification, and
 - I do request an immigration judge review of this custody determination.
 - I do not request an immigration judge review of this custody determination.

(V) [REDACTED]

 Signature of Alien

10/09/2025

 Date

The contents of this notice were read to [REDACTED] in the SPANISH language.
(Name of Alien) (Name of Language)

[REDACTED] [Signature]

 Name and Signature of Officer

N/A

 Name or Number of Interpreter (if applicable)

DEPORTATION OFFICER

 Title

Exhibit B

From: [REDACTED]
 To: jacob.wedemeyer@estrella.org, [Nelly.Robles](mailto:Nelly.Robles@estrella.org)
 Cc: [REDACTED], [Jamye.Ward](mailto:Jamye.Ward@estrella.org), [REDACTED], [REDACTED], [REDACTED], [Natasha.H.Rosario](mailto:Natasha.H.Rosario@estrella.org), [Imelda.Maynard](mailto:Imelda.Maynard@estrella.org), [Valgina.Rodriguez.Calderon](mailto:Valgina.Rodriguez.Calderon@estrella.org)
 Subject: RE: [EXTERNAL] W.O.B.P. [REDACTED]
 Date: Friday, October 3, 2025 12:02:37 PM
 Attachments: [image001.png](#), [image002.png](#), [image003.png](#), [image004.png](#), [image005.png](#), [image006.png](#), [image007.png](#), [image008.png](#), [image009.png](#), [image010.png](#), [image011.png](#), [image012.png](#), [image013.png](#), [image014.png](#), [image.png](#), [Outlook-iaebudx.png](#), [Outlook-vShubmh.png](#), [Child_RC.pdf](#), [NTA.pdf](#)

Good morning,

Please see below information received pertaining to this Child:

On 10/01/2025, the El Paso Field Office received new Interim guidance from HQ on Age-Out Custody Determinations. Regarding Detention Authority for "Applicants for Admission", effective immediately it is the position of DHS that such aliens are subject to detention under INA § 235(b) and may not be released from ICE custody except by INA § 212(d)(5) parole. Parole may be granted on a case-by-case basis for "urgent humanitarian reasons" or "significant public benefit." ELP FOJC will continue to carefully evaluate UAC cases when making custody determinations. Once a custody determination is made and DHS/ICE decides to continue detention the Age Outs will be served an I-200 (Warrant of Arrest), camp space will be approved in one of our adult facilities, and transportation arrangements will be made by ELP FOJC for the day of Age Out. Due to the new Age Out interim Guidance both Compass Connections ELP upcoming Age Outs, EGGL [REDACTED] WOBP [REDACTED] will remain in custody and continue their removal proceedings. If you have any questions feel free to contact me.

Message was received from:

The FOJC POC is :

C: [REDACTED]

Please reach out if further assistance is needed.

Respectfully,

[REDACTED]
 Lead Case Manager
 Phone: [REDACTED]
 Direct: [REDACTED]
 Cell: [REDACTED]
CompassConnections.org
 Address

El Paso, TX [REDACTED]



From: Jacob Wedemeyer <jwedemeyer@estrella.org>
 Sent: Friday, October 3, 2025 11:43 AM
 To: [REDACTED] <[\[REDACTED\]@Compass.team](mailto:[REDACTED]@Compass.team)>
 Cc: [REDACTED] <[\[REDACTED\]@compass.team](mailto:[REDACTED]@compass.team)>; [REDACTED] <[\[REDACTED\]@Compass.Team](mailto:[REDACTED]@Compass.Team)>; [Jamye.Ward](mailto:Jamye.Ward@estrella.org) <jward@estrella.org>; [REDACTED] <[\[REDACTED\]@Compass.team](mailto:[REDACTED]@Compass.team)>; [REDACTED] <[\[REDACTED\]@Compass.team](mailto:[REDACTED]@Compass.team)>; [REDACTED] <[\[REDACTED\]@Compass.team](mailto:[REDACTED]@Compass.team)>; [Natasha.H.Rosario](mailto:Natasha.H.Rosario@estrella.org) <nrosario@estrella.org>; [Imelda.Maynard](mailto:Imelda.Maynard@estrella.org) <imaynard@estrella.org>; [Jamye.Ward](mailto:Jamye.Ward@estrella.org) <jward@estrella.org>; [Valgina.Rodriguez.Calderon](mailto:Valgina.Rodriguez.Calderon@estrella.org) <vrodriquez@estrella.org>
 Subject: [EXTERNAL] W.O.B.P. [REDACTED]

[WARNING: This email was sent from an external email address. DO NOT CLICK links or attachments unless you recognize the sender and know the content is safe. Never give out your user ID or password.]

Dear Ms. [REDACTED] and Compass Connections:

Thank you for your email regarding W.O.B.P. Please provide any ICE paperwork or correspondence denying Release on Recognizance (ROR). Please also provide the child's post-18 plan and request for ROR. Please also provide the child's BC and all NTAs. Thank you.

Sincerely,

Jacob Wedemeyer
 Managing Attorney
 NOTE MY UPDATED EMAIL ADDRESS
 Unaccompanied Minors Program

 ✉ jwedemeyer@estrella.org
 ☎ 915.298.6250
 📞 915.532.3975 ext 1502
 📍 2400 E. Yandell Dr., El Paso, TX 79903



**Estrella
del Paso**

*A Catholic Legal Services
Ministry for Migrants*

estrelladelpaso.org



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From: [REDACTED]@Compass.team>
Sent: Thursday, October 2, 2025 3:46 PM
To: Natasha H. Rosario <nrosario@estrella.org>; Estrella UMP <ump@estrelladelpaso.org>; UMP <ump@estrella.org>
Cc: [REDACTED]@compass.team>; [REDACTED]@Compass.Team>; Jacob Wedemeyer <jwedemeyer@estrella.org>; Jamye Ward <jward@estrella.org>; Jesus M. Guereca-Mendez <jguereca@estrella.org>; [REDACTED]@Compass.team>; [REDACTED]@Compass.team>; [REDACTED]@Compass.team>; [REDACTED]@Compass.team>
Subject: Estrella Del Paso Legal Services Referral WOBP [REDACTED] (Compass Connections El Paso [REDACTED])

Estrella Del Paso,

I hope this message finds you well.

Kindly following up to inform you that the child WOBP [REDACTED] will be aging out on 10/05/2025. The request for Release on Recognizance (ROR) has been reviewed and has been denied by the FOJC.

Thank you.

Respectfully,

[REDACTED]
Case Manager

Cell: [REDACTED]

CompassConnections.org

Address

El Paso, TX [REDACTED]



Exhibit C

From: [Jamye Ward](#)
To: [Imelda Maynard](#)
Subject: FW: New Interim guidance from HQ on Age-Out Custody Determinations
Date: Friday, October 3, 2025 11:52:48 AM
Attachments: [Outlook-fvkugnod.png](#)

From: [REDACTED]@cplc.org>
Sent: Friday, October 3, 2025 11:35 AM
To: Natasha H. Rosario <nrosario@estrella.org>; Jamye Ward <jward@estrella.org>; UMP <ump@estrella.org>
Cc: [REDACTED]@cplc.org>; [REDACTED]@cplc.org>
Subject: Fw: New Interim guidance from HQ on Age-Out Custody Determinations

Good morning Ms. Rosario and Ms. Ward,

As per our conversation, this is the information we received as new interim guidance from FOJC.

Please let us know if there is anything we need to provide by our end.

Sincerely,

[REDACTED]

LEAD CASE MANAGER
CPLC HUMMINGBIRD HOUSE



El Paso, TX 79938

W [REDACTED] | C [REDACTED]
[REDACTED]@cplc.org
cplc.org

From: [REDACTED]@ice.dhs.gov>
Sent: Thursday, October 2, 2025 12:43 PM
To: [REDACTED]@cplc.org>
Cc: ELP-Juvenile <ELP-Juvenile@ice.dhs.gov>
Subject: New Interim guidance from HQ on Age-Out Custody Determinations

Greetings CPLC Hummingbird House,

On 10/01/2025, the El Paso Field Office received new Interim guidance from HQ on Age-Out Custody Determinations. Regarding Detention Authority for “Applicants for Admission”, effective immediately it is the position of DHS that such aliens are subject to detention under INA § 235(b) and may not be released from ICE custody except by INA § 212(d)(5) parole. Parole may be granted on a case-by-case basis for “urgent humanitarian reasons” or “significant public benefit.”

ELP FOJC will continue to carefully evaluate UAC cases when making custody determinations. Once a custody determination is made and DHS/ ICE decides to continue detention the Age Outs will be served an I-200 (Warrant of Arrest), camp space will be approved in one of our adult facilities, and transportation arrangements will be made by ELP FOJC for the day of Age Out. Due to the new Age Out interim Guidance any upcoming Age Outs will remain in custody to continue their removal proceedings. If you have any questions, feel free to contact me.

Respectfully,

[REDACTED]

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