

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION**

Mario Alexander GUEVARA,

*Petitioner,*

v.

George STERLING, in his official capacity  
as Director of the Atlanta Field Office,  
Immigration and Customs Enforcement *et*  
*al.*,

*Respondents.*

Case No. 2:25-cv-00104-  
LGW-BWC


**DECLARATION OF JULIO E. MORENO**

I, Julio E. Moreno, being duly sworn, depose and state as follows:

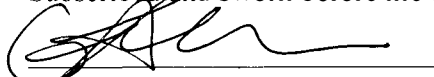
1. I am an attorney licensed in Georgia and have practiced immigration law for approximately seventeen (17) years
2. In the course of my practice, I have represented hundreds of clients in removal proceedings and bond hearings before the immigration court.
3. I have reviewed the immigration record of Mario Guevara and am familiar with the facts of his case.
4. In my experience, it is highly unusual for the government to claim a detainee is a danger to the community at a bond hearing solely because a firearm is present in the home, without any evidence of misconduct involving the weapon.
5. In seventeen years of practice, I have never seen the Office of the Principal Legal Advisor (OPLA) appeal a bond grant—or seek a discretionary stay—where the individual has no significant criminal history, presents strong evidence of non-dangerousness, entered lawfully, and shows clear eligibility to adjust status.
6. Government appeals of bond grants, especially stays, are rare and generally reserved for cases involving serious criminal conduct, clear evidence of danger, or major flight risk. I have not encountered such an appeal where no criminal charges are pending.
7. The government's decision to appeal the Immigration Judge's bond grant in this case is highly unusual and inconsistent with common practice I have observed throughout my career.

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

Executed this 19<sup>th</sup> day of August 2025, at Atlanta, Georgia.

  
Julio E. Moreno  
Attorney at Law

Subscribed and sworn before me on this 19<sup>th</sup> day of August 2025.

  
Gabriela Alberto  
Notary Public  
My Commission Expires: December 16<sup>th</sup>, 2025

