

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

ANY LUCIA LOPEZ BELLOZA,

Petitioner,

v.

PATRICIA HYDE, Field Office Director,
MICHAEL KROL, HSI New England Special
Agent in Charge, and TODD LYONS, Acting
Director U.S. Immigration and Customs
Enforcement, KRISTI NOEM, U.S. Secretary of
Homeland Security, PAMELA BONDI, U.S.
Attorney General, DONALD J. TRUMP,
President of the United States of America

Respondents.

Civil Action No. 1: 25-cv-13499-RGS

RESPONDENTS' STATUS REPORT

Respondents by and through their attorney, Leah B. Foley, United States Attorney for the District of Massachusetts, respectfully submit this Status Report in response to the Court's February 13, 2026 Order on Civil Contempt. Doc. No. 42. In such Order, this Court directed Respondents to "file status reports (accompanied by declarations from individuals with personal knowledge) with the court ... confirming the tangible steps they have taken to facilitate [Petitioner's] return to the United States in compliance with this Order." *Id.* at 7-8.

Respondents attach a declaration from U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations, Assistant Field Office Director Keith Chan in response to the Order. *See* Exhibit A. Per AFOD Chan, ICE ERO has made arrangements for Petitioner's return to the United States as ordered by this Court. *Id.*, ¶ 4. Specifically, ICE ERO has manifested Petitioner for an ICE flight departing San Pedro Sulu on February 27, 2026 at approximately 1:00

PM local Honduran time. *Id.* Such flight is scheduled to arrive in the United States in Harlingen, Texas. *Id.* ICE ERO has also arranged for a ERO officer to contact Petitioner to facilitate her boarding of the plane and answer any questions she may have. *Id.* This information has been conveyed to Petitioner's attorneys of record by the undersigned.

Respectfully submitted,

LEAH B. FOLEY
United States Attorney

Dated: February 26, 2026

By: /s/ Mark Sauter
Mark Sauter
Assistant United States Attorney
United States Attorney's Office
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Boston, MA 02210
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CERTIFICATE OF SERVICE

I, Mark Sauter, Assistant United States Attorney, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

Dated: February 26, 2026

By: /s/ Mark Sauter
Mark Sauter
Assistant United States Attorney

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DISTRICT OF MASSACHUSETTS**

ANY LOPEZ BELLOZA,

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PATRICIA HYDE, Field Office Director et al..
Respondents

Civil Action No. 1:25-cv-13499-RGS

DECLARATION OF ASSISTANT FIELD OFFICE DIRECTOR KEITH CHAN

Pursuant to the authority of 28 U.S.C. § 1746, I, Keith Chan, Assistant Field Office Director for U.S. Department of Homeland Security, United States Immigration and Customs Enforcement, Enforcement and Removal Operations, Burlington, Massachusetts declare as follows:

1. I am an Assistant Field Office Director (“AFOD”) for U.S. Department of Homeland Security, United States Immigration and Customs Enforcement, (“ICE”) Enforcement and Removal Operations (“ERO”). I have held this position since May 2022, and I have been employed by ICE since August 2008. I am currently on a temporary detail to ERO Headquarters in the Field Operations Division.
2. As AFOD, my official duties include overseeing the management, monitoring, scheduling, and execution of removal orders for noncitizens in ICE custody whose cases involve federal litigation. This entails ensuring compliance with court orders, legal mandates, and applicable policies while coordinating with agency counsel and the

Department of Justice to address litigation-related requirements. I have experience utilizing ICE record systems to obtain information regarding specific aliens. ICE maintains electronic and paper records on noncitizens. These records are made in the course of regularly conducted business activity at or near the time of relevant events by a person with knowledge of these events. In preparing this declaration, I have examined ICE official records, not limited to, but including the Enforce Alien Removal Module (“EARM”). EARM is an electronic database ordinarily relied upon to ascertain an alien’s immigration history, current case status, and plans for removal, if any.

3. I am submitting this declaration in response to the Court’s February 13, 2026 order.
4. It is my understanding that the Petitioner will be placed on an ICE flight tomorrow, February 27, 2026, departing from San Pedro Sula, Honduras. The flight is scheduled to depart Honduras at 1pm, local Honduran time, and will land in Harlingen Texas. There will be an ERO point of contact in Honduras to help facilitate her return to the United States.

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

Signed on the 26th of February 2025.



Digitally signed by KEITH M
CHAN
Reason: I have reviewed this
document
Date: 2026.02.26 16:07:56 -05'00'

Keith Chan
Assistant Field Office Director
U.S. Department of Homeland Security
United States Immigration and Customs Enforcement
Burlington, Massachusetts