

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	No. 3:26-cv-0061
)	
v.)	
)	
MARTA ALICIA RAMIREZ VELIZ,)	
)	
Defendant.)	
)	

UNITED STATES' COMPLAINT

1. This is a civil action brought by the United States of America ("United States") against Marta Alicia Ramirez Veliz ("Veliz" or the "Defendant") to collect a civil penalty imposed by the United States Immigration & Customs Enforcement ("ICE") on Veliz for willfully failing or refusing to leave the United States pursuant to a final order of removal pursuant to 8 U.S.C. § 1324d and its implementing regulations.

PARTIES

2. Plaintiff is the United States of America, and it brings this action on behalf of its Department of Homeland Security, U.S. Immigration & Customs Enforcement.

3. Defendant Veliz is an individual and noncitizen residing in Chesterfield County, Virginia within this district and division.

JURISDICTION AND VENUE

4. This Court has jurisdiction over this matter under 28 U.S.C. §§ 1331, 1345, and 1335, and 8 U.S.C. § 1329.

5. Venue is proper in this district pursuant to 28 U.S.C. §§ 1391(b)(1), (b)(2) and 1395(a) because the Defendant resides or is found in this district and the penalty accrued in this district or the events or omissions giving rise to the claim occurred in this district.

FACTS

6. Defendant is indebted to the United States for a civil penalty assessed for willfully failing or refusing to leave the country during the period to do so.

7. The total principal amount of the civil penalty is \$941,114.00, as of April 24, 2025.

8. Defendant owes the civil penalty pursuant to section 274D(a) the Immigration and Nationality Act (“INA”), 8 U.S.C. § 1324d(a). That section provides that an alien who is subject to a final order of removal and willfully fails or refuses to depart shall pay a civil penalty. The civil penalty is set at \$998 for each day of the violation. 8 U.S.C. § 1324d(a); 8 C.F.R. § 280.53(b)(14).

9. Defendant lives in this country illegally and is subject to removal. On July 1, 2019, an immigration judge entered an Order of Removal to Defendant. The Order of Removal became final after the Board of Immigration Appeals dismissed Defendant’s appeal on September 23, 2022.

10. On April 29, 2025, the United States served a Notice of Intention to Fine on Defendant, which included a notice of Defendant’s right to contest the civil monetary penalty by, within 30 days from service, submitting a written defense setting forth the reasons why the penalty should not be imposed.

11. Defendant did not submit any written defense or other appeal in response to the Notice of Intention to Fine, and a final order imposing the penalty was entered on June 25, 2025.

12. Demand for payment has been personally served on the Defendant.
13. Defendant has not paid any of the penalty and remains liable to the United States for the full penalty amount plus statutory additions.

COUNT I
Civil Penalty
(Civil Penalties for Failure to Depart – 8 U.S.C. § 1324d(a))

14. The United States incorporates paragraphs 1 through 13 above as set forth fully herein.

15. Section 1324d(a) of Title 8 provides that “[a]ny alien subject to final order of removal who willfully fails or refuses to depart from the United States pursuant to the order shall pay a civil penalty of not more than \$500 to the Commissioner for each day the alien is in violation of this section.” This amount was adjusted for inflation to \$998 per day pursuant to 8 C.F.R. § 280.53(b)(14).

16. Defendant is subject to a civil penalty for failure to depart under 8 U.S.C. § 1324d(a) in the amount of \$941,114.00 in penalties plus accrued interest.

WHEREFORE, Plaintiff, the United States, requests that judgment be entered in its favor and against Defendant Veliz in the principal total amount of \$941,114.00, plus accrued interest,

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penalties, costs, and fees through the date of judgment; post-judgment interest at the legal rate until paid in full; and any other relief the Court deems just and proper.

Respectfully submitted,

Dated: January 23, 2026

TODD W. BLANCHE
DEPUTY ATTORNEY GENERAL

By:

/s/
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