UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
AT OWENSBORO

K.E.O. PETITIONER

v. CIVIL ACTION NO. 4:25-CV-00074-RGJ (*e-filed*)

Jason WOOSLEY, Grayson County Jailer; Samuel OLSON, Field Office Director for U.S. Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary, U.S. Department of Homeland Security RESPONDENTS

SHOW CAUSE WHY THE WRIT OF HABEAS CORPUS SHOULD NOT BE GRANTED

Petitioner is an inadmissible criminal alien, sentenced to 24 years in prison for her armed robbery and conspiracy convictions. (Doc. 1, PageID.6-7, ¶ 21.). She was removed from the United States after her release from prison, but she unlawfully re-entered the United States without authorization, was caught, and was convicted of another felony, illegal re-entry. (Doc. 1, PageID.6-7, ¶¶ 21-23, 25.). Congress enacted laws to remove criminal aliens from the United States, keep them out, and detain them until removal if they return. Such laws were explicitly aimed at criminal aliens like Petitioner, who was "convicted of 2 or more offenses … regardless of whether the conviction was in a single trial or whether the offenses arose from a single scheme of misconduct … for which the aggregate sentences to confinement were 5 years or more is inadmissible." 8 U.S.C. § 1182(a)(2)(B). "Under no circumstance during the removal period shall the Attorney General release an alien who has been found inadmissible under section 1182(a)(2)". 8 U.S.C. § 1231(a)(2)(A). Because Petitioner is an inadmissible criminal alien, our laws require that she be removed from the country and detained until her removal. *Id.* Petitioner's detention is both lawful and mandatory. Congress also enacted laws such as 8 U.S.C. § 1252(g) and 8 U.S.C. § 1252(b)(9) to preclude jurisdiction and judicial review of decisions and actions taken to execute removal orders against aliens, such as Petitioner's arrest and detention.

Petitioner's allegations are based on incorrect assumptions about the facts of this case and the applicable law. She bases her factual and legal arguments "on information and belief" that are inaccurate. (Doc. 1, PageID.11, 15, 18, ¶¶ 37, 54, 71.). Her petition is predicated on the false assumption that she is detained due to issuance of a revocation of supervised release pursuant to 8 C.F.R. § 241.4(l)(2). (Doc. 1, PageID.2, 3, 10-11, 12-13, 14, 15-16, 17, 18, ¶¶ 4, 7, 34, 36-37, 39, 42-46, 49, 50-51, 53-56, 60-61, 64-65, 71-72.). She is actually detained by operation of a Warrant of Arrest and a Notice of Custody Determination, pursuant to separate authority and procedure under 8 C.F.R. § 236.1(b) and (g). (Exh. 1, Warrant of Arrest; Exh. 2, Notice of Custody Determination.). Petitioner's arguments about supposed infirmities in a revocation of supervised release are without factual or legal basis or merit. She was given a temporary release to care for a newborn, but after more than a year of that child's aging and development, she was detained because the purpose of her release was completed, she had an executable final order of removal, and the law required her detention as an inadmissible criminal alien. (Exh. 4, Schilling Dec. at 2-3, ¶¶ 6-9; Doc. 1, PageID.8, ¶¶ 27-28; Doc. 1-4, PageID.37-38.).

Facts and applicable law

I. This court lacks jurisdiction over Petitioner's action

District courts have only that jurisdiction which Congress has provided. *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 377 (1994); *Sheldon v. Sill*, 49 U.S. 441, 448 (1850) ("Congress, having the power to establish the courts, must define their respective jurisdictions."). Pursuant to the 1996 Illegal Immigration Reform and Immigrant Responsibility Act and the 2005

REAL ID Act, this Court is deprived of jurisdiction over this case. Specifically, 8 U.S.C. § 1252(g) strips district courts of jurisdiction over "any cause or claim by or on behalf of any alien arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders against any alien under this chapter." This case arises out of the arrest of Petitioner for the execution of a removal order against her, and therefore this Court lacks jurisdiction to hear this case.

In full, 8 U.S.C. § 1252(g) states:

> Except as provided in this section and notwithstanding any other provision of law (statutory or nonstatutory), including section 2241 of title 28, or any other habeas corpus provision, and sections 1361 and 1651 of such title, no court shall have jurisdiction to hear any cause or claim by or on behalf of any alien arising from the decision or action by the Attorney General to commence proceedings, adjudicate cases, or execute removal orders against any alien under this chapter.

This section establishes that this action cannot be brought in this court because it arises from the execution of Petitioner's removal order. The Sixth Circuit has specifically held that district courts lack jurisdiction to hear claims that would seek to prevent the government from executing a valid order of removal. *Rranxburgaj v. Wolf*, 825 F. App'x 278, 282-3 (6th Cir. 2020) ("we do not have jurisdiction to decide claims that arise from the decision of the Executive Branch to execute a removal order").

Other provisions of the Immigration and Nationality Act also deprive this Court of jurisdiction over this action. For example, 8 U.S.C. § 1252(b)(9) states:

> Judicial review of all questions of law and fact, including interpretation and application of constitutional and statutory provisions, arising from any action taken or proceeding brought to remove an alien from the United States under this subchapter shall be available only in judicial review of a final order under this section.

Here, Petitioner's arrest is an "action taken . . . to remove an alien from the United States" and thus this Court lacks jurisdiction to review said action.

II. Petitioner bears the burden to establish that her custody is in violation of the Constitution or laws or treaties of the United States.

Petitioner's action before this Court is a habeas petition that cites 28 U.S.C. § 2241 as a jurisdictional basis. (Doc. 1, PageID.1, 4, ¶ 14.). To obtain habeas relief, Petitioner must not merely show that she is "in custody", but rather that she is "in custody in violation of the Constitution or laws or treaties of the United States". 28 U.S.C. § 2241(c)(3); *see also Dickerson v. United States*, 530 U.S. 428, 439, n. 3 (2000) ("Habeas corpus proceedings are available only for claims that a person 'is in custody in violation of the Constitution or laws or treaties of the United States'", quoting 28 U.S.C. § 2254(a).). "[I]n a habeas proceeding the petitioner 'has the burden of establishing his right to federal habeas relief and of proving all facts necessary to show a constitutional violation.'" *Caver v. Straub*, 349 F.3d 340, 351 (6th Cir. 2003), quoting *Romine v. Head*, 253 F.3d 1349, 1357 (11th Cir. 2001). Habeas relief is limited to "simple release", and habeas is not a vehicle through which an alien can challenge other aspects of their immigration proceedings or determinations. *Dep't of Homeland Sec. v. Thuraissigiam*, 591 U.S. 103, 117–20 (2020).

III. Petitioner's custody is not in violation of the Constitution or laws because her felony convictions render her an inadmissible alien for whom detention is mandatory.

Petitioner is a felon who was convicted and sentenced to 24 years in prison on two counts of Robbery While Armed with a Deadly Weapon and one count of Conspiracy. (Doc. 1, PageID.6-7, ¶¶ 20-21; 2011 WL 7574305.). Accordingly, Petitioner is an inadmissible criminal alien. 8 U.S.C. § 1182(a)(2)(B) states:

> Any alien convicted of 2 or more offenses (other than purely political offenses), regardless of whether the conviction was in a single trial or whether the offenses arose from a single scheme of misconduct and regardless of whether the offenses involved moral turpitude, for which the aggregate sentences to confinement were 5 years or more is inadmissible.

Petitioner was removed from the country after a grant of criminal parole that allowed her to avoid serving the remaining 13 years of her prison sentence for robberies. (Doc. 1, PageID.6-7, ¶ 21.). Approximately two months later by her telling, despite being inadmissible and having no authorization to re-enter the United States, she illegally re-entered the United States, committing another felony in the process. (Doc. 1, PageID.6-7, ¶¶ 21-23.). Petitioner, a felon and illegal alien who re-entered without authorization after her removal, was arrested for illegal re-entry, and convicted of that felony offense. (Doc. 1, PageID.7, ¶ 23, 25.).

8 U.S.C. § 1231(a)(2)(A) states:

> During the removal period, the Attorney General shall detain the alien. Under no circumstance during the removal period shall the Attorney General release an alien who has been found inadmissible under section 1182(a)(2) or 1182(a)(3)(B) of this title or deportable under section 1227(a)(2) or 1227(a)(4)(B) of this title.

8 U.S.C. § 1182(a)(2) states, in subparagraph (a)(2)(B),

> Any alien convicted of 2 or more offenses (other than purely political offenses), regardless of whether the conviction was in a single trial or whether the offenses arose from a single scheme of misconduct and regardless of whether the offenses involved moral turpitude, for which the aggregate sentences to confinement were 5 years or more is inadmissible.

Because Petitioner is an inadmissible criminal alien, she is subject to mandatory detention.

IV. Petitioner temporarily avoided custody at the conclusion of her second felony sentence on her then-proffered basis of temporary care for a 41 day old newborn.

Petitioner offers this Court the inaccurate assertion that "[t]wo federal judges had already concluded that release under supervision pending the completion of her immigration proceedings was appropriate, as had ICE". (Doc. 1, PageID.15, 18, ¶¶ 51, 67.). At the time, Petitioner described a need for a very limited amount of time before her removal, for purposes of caring for a newborn; she spoke to the Court of "a newborn who needs her mother for the care and nurturing in these critical first months of her life that only a mother can give", and how "[m]other-child bonding in the first months of a baby's life is critical for the baby's development both physically, mentally, and emotionally." (Exh. 3, Sentencing Memorandum, Doc. 36 at 12, 13.). *See also id.* at 10-11 ("during the first three months of life the infant should have one consistent primary caregiver"; "there is no fully adequate substitute for a mother caring for her infant in the first three months of life."). Petitioner represented to her sentencing court that she sought a merciful sentence and release to care for a then-41 day old newborn in the first three months of life, not an indefinite release for the duration of immigration proceedings.

Petitioner's sentencing court stated merely its anticipation that she would not be deported until after nursing of her then-newborn child until the age of six to nine months. (Doc. 1-4, PageID.37, "By policy, Ms. [redacted] will not likely be deported until after her nursing of her newborn concludes (usually six to nine months)".). The court also indicated its expectation that Petitioner would only remain out of custody until her newborn reached the age of six to nine months. (*Id.*, "ICE will keep Ms. [redacted] electronically monitored until then".). The court said nothing about Petitioner remaining in the United States or out of custody after that brief six to nine month period of time. (*Id.* at PageID.34-38.). The sentencing court issued its sentencing memorandum in March 2024, which means it only anticipated Petitioner being on supervised release until July 2024 to October 2024 if its anticipated six to nine month period ran from birth, or until September 2024 to December 2024 if from the time of sentencing. (Doc. 1-4, PageID.37, 38.). Consistent with that court's expressed expectations, Petitioner's child is now a year and a half old and Petitioner has now been in custody for more than three months, presumably not nursing her child in that time. (Doc. 1, PageID.7, 10, ¶¶ 24, 32.).

Petitioner tells this Court that she is pursuing an avenue to remain in the United States. (Doc. 1, PageID.2, 8-9, ¶¶ 5, 30.). This contrasts starkly with her reassurances to her sentencing court that leniency was warranted because of what she described as near-certain removal. Her sentencing memorandum included a section titled "Expected Deportation". (Exh. 3, Sentencing Memorandum at 10.). In that section, she told the Court: "Absent an immigration miracle (which is very unlikely here), [Petitioner] can expect to be deported upon the completion of her sentence in this case." (*Id.*). "Typically, persons convicted of illegal re-reentry are deported very shortly after completion of their custodial sentence. They are deported before service of any substantial portion of any court-imposed supervised release term. She will lose her life in the United States again." (*Id.*).

Petitioner went on to state, "[i]n this case, there would seem to be little reason to send [Petitioner] to federal prison to be incarcerated beyond the time that she has already served (four and half months in jail and 39 days in home incarceration) only to have her be deported following such period." (*Id.*). "That is, even if this court were to believe that she is any kind of danger, her deportation to Mexico will ensure that she poses no danger to any person or to this community in the United States. Stated another way, there is no good incapacitation rationale that is applicable in this case." (*Id.*). The leniency that Petitioner received from her sentencing court was predicated on her representations that she would quickly be removed from the country, such that "her deportation to Mexico will ensure that she poses no danger to any person or to this community in the United States", and that due to her certain removal, "there is no good incapacitation rationale that is applicable in this case". (*Id.*; see also Doc. 1-4 at 37, 38, noting the court's assumption that a short sentence was justified in part because Petitioner would soon be removed.).

Petitioner cites ICE Directive 11032.4: Identification and Monitoring of Pregnant, Postpartum, or Nursing Individuals (July 1, 2021), and her sentencing judge's reliance on it for the proposition that Petitioner would be allowed a brief time to nurse her newborn before being deported. (Doc. 1, PageID.8, ¶ 27.). ICE allowed Petitioner to be out for a brief period of time because her infant child was approximately two months old and breast feeding. (Exh. 4, Schilling Dec. at 2, ¶¶ 6-7.). Petitioner's time out of detention was always intended to last only a brief period of time so that a newborn could be nursed by its mother in the first months of its life; neither ICE nor her sentencing judge ever contemplated Petitioner to remain out of detention for longer than that short period, or for any other reason or purpose. (*Id.*; Doc. 1, PageID.8, ¶ 27.).

Petitioner mistakenly asserts that her "circumstances have not changed". (Doc. 1, PageID.12, ¶ 41.). Elsewhere, she argues that her post-conviction release was justified by nursing her newborn, which her sentencing judge in March 2024 (citing consistent ICE policy) expected would last only six to nine months. (Doc. 1, PageID.8, ¶ 27; Doc. 1-4, PageID.37.). That time period has lapsed; Petitioner's child is now more than a year and a half old. (Doc. 1, PageID.7, ¶ 24.). Even if this case were viewed through the lens of revocation of supervised release as Petitioner urges, she concedes that supervised release can be revoked where "the purposes of release have been served", or when "any other circumstance, indicates that release would no longer be appropriate." (Doc. 1, PageID.12-13, ¶ 43, citing 8 C.F.R. § 241.4(l).). The purpose of any release has been served, as she has nursed her child through the first year and a half of its life; the child's different age and needs present changed circumstances. Regardless, as explained below, Petitioner is an inadmissible criminal alien under 8 U.S.C. § 1182(a)(2)(B), 8 U.S.C. § 1231(a)(2)(A) mandates her detention, and she is lawfully detained subject to her lawfully issued Notice of Custody Determination and Warrant of Arrest.

V. Once the purpose of Petitioner's temporary release was completed, she was lawfully subjected to a Warrant of Arrest and a Notice of Custody Determination.

Consistent with her sentencing court's expectation that ICE policy would allow her six to nine months to nurse her 41-day newborn, Petitioner was not immediately taken into custody upon completion of her second felony sentence. (Doc. 4-1, PageID.37; Exh. 4, Schilling Dec. at 2, ¶¶ 6-7.). That was in March, 2024, and now in August, 2025, the once-newborn is a year and a half old. (Doc. 1-4, PageID.37-38; Doc. 1, PageID.7, ¶ 24.). The purpose of Petitioner's temporary release has lapsed, as has the time afforded by the ICE policy her sentencing judge cited. (*Id.*; Exh. 4, Schilling Dec. at 2, ¶¶ 6-7.).

A. Notice of Custody Properly Issued.

Immigration officials have authority to issue a Form I-286, Notice of Custody Determination, at any time up to the time removal proceedings are completed. 8 C.F.R. § 236.1(g). A Notice of Custody Determination can be issued by any official listed in 8 C.F.R. § 287.5(e)(2). 8 C.F.R. § 287.5(e)(2)(xxxii) grants that authority to supervisory detention and deportation officers. On April 28, 2025, a supervisory detention and deportation officer (SDDO) issued a Notice of Custody Determination (Form I-286) to Petitioner, because she had an executable final order of removal and her once-infant, nursing child was now 16 months old. (Exh. 2. Notice of Custody Determination; Exh. 4, Schilling Dec. at 2-3, ¶¶ 6-8). The SDDO determined that Petitioner would now be detained. (*Id.*).

B. Warrant of Arrest Properly Issued.

Inadmissible aliens may be arrested and taken into custody under the authority of a Form I-200, Warrant of Arrest. 8 C.F.R. § 236.1(b)(1). Warrants of Arrest may be issued by immigration officers listed in 8 C.F.R. § 287.5(e)(2). *Id.* 8 C.F.R. § 287.5(e)(2)(xxxii) authorizes SDDOs to issue Warrants of Arrest. On April 28, 2025, the same day ICE determined that an arrest was appropriate, an SDDO issued a Warrant of Arrest (Form I-200) for Petitioner. (Exh. 1, Warrant of Arrest; Exh. 4, Schilling Dec. at 2-3, ¶¶ 6-9.). The Warrant of Arrest was based on probable cause that Petitioner was removable from the United States, including that she had pending removal proceedings, and that identity checks, record checks, statements she made, and other evidence indicated that she lacked immigration status and was removable. (*Id.*). Petitioner's Notice of Custody Determination and Warrant of Arrest lawfully carried out statutes requiring her detention.

Petitioner's arrest and detention were and are consistent with her status as an inadmissible criminal alien with an executable order of removal, and as explained above, Petitioner's convictions and sentences for multiple offenses aggregating over five years make her inadmissible under 8 U.S.C. § 1182(a)(2)(B), and 8 U.S.C. § 1231(a)(2)(A) mandates her detention.

VI. Changed circumstances are not necessary to justify Petitioner's detention, but they are present.

Petitioner repeatedly insists that changed circumstances are necessary to justify revocation of supervised release. (Doc. 1, PageID.3,10, 12, 13, 15, 16, 18, ¶¶ 7-8, 33, 41, 44, 50, 55, 60, 70.). This is incorrect because Petitioner erroneously argues that she is detained by operation of a revocation of supervised release, when in fact she has been detained pursuant to a Notice of Custody Determination and Warrant of Arrest. (Exh. 2, Notice of Custody Determination; Exh. 3, Warrant of Arrest; Exh. 4, Schilling Dec. at 2-3, ¶¶ 6-9.).

However, even if the Court were to credit Petitioner's insistence that her custody must be justified by a change in circumstance, such a change is found in the Petition's factual recitations. Despite repeated, blanket denials of changed circumstances (Doc. 1, PageID.3, 10, 12, 15, 16, 18, ¶¶ 7, 8, 33, 41, 50, 55, 60, 70), the petition establishes that the 41-day old newborn in need of the care a nursing newborn needs was over a year old by the time ICE detained Petitioner. (Doc. 1, PageID.3, ¶¶ 24-25.). The federal judge who allowed her release from criminal custody and sentenced her to time served cited a period of six to nine months for newborn care. (Doc. 1, PageID.8, ¶ 27; Doc. 1-4, PageID.37-38.). Consistent with this, ICE contemporaneously allowed Petitioner to temporarily be with and nurse her newborn for this period of time. (Doc. 1, PageID.8, ¶¶ 27-28; Doc. 1-3, PageID.29; Exh. 4, Schilling Dec. at 2-3, ¶¶ 6-9.). Petitioner's child is now 18 months old, and was 15 months old at the time ICE took Petitioner into custody (Doc. 1, PageID.7, 10, ¶¶ 24, 33) – circumstances have changed.

Regardless, a change in circumstances is not necessary for an inadmissible criminal alien to be detained. Even for revocation of supervised release under 8 C.F.R. § 241.4(l), Petitioner could be detained "in the exercise of discretion", or because "revocation is in the public interest", or because "[t]he purposes of release have been served", or if "any other circumstance, indicates that release would no longer be appropriate"; all of those apply in this case, as do Petitioner's changed circumstances. 8 C.F.R. § 241.4(l)(2). Petitioner is detained due to a Notice of Custody Determination and Warrant of Arrest issued pursuant to separate provisions at 8 C.F.R. § 236.1(b) and (g), and that detention would be lawful whether or not changed circumstances were present.

VII. Petitioner's description of herself and her circumstances omits significant facts.

Petitioner's filing goes to great lengths to portray herself as a sympathetic figure. The only fact about Petitioner that is relevant to this case is that the received a 24 year sentence for robbery related offenses, rendering her an inadmissible alien under 8 U.S.C. § 1182(a)(2)(B), and mandating her detention under 8 U.S.C. § 1231(a)(2)(A). To the extent Petitioner's personal circumstances and characteristics might have any bearing on this case, the Court should recognize that Petitioner describes her criminal history and conduct very selectively, particularly the findings of the sentencing judge in her illegal re-entry case. (Doc. 1, PageID.7-8, ¶¶ 23-28.). If any of that is given any consideration, the Court should also consider the following:

- Petitioner's claim that "[y]oung men suggested robbing a gas station" (Doc. 1, PageID.7, ¶ 20) is contrary to facts established in her prosecution: Petitioner is the one who suggested, initiated, and organized the armed robberies for which she went to prison, and she solicited three others to commit those robberies for her financial benefit while she drove the getaway car. *[Petitioner] v. State*, 969 N.E.2d 1032, 1036 and 1047 (Ind. Ct. App. 2012).
- She now characterizes her robberies as "nonviolent" (Doc. 1, PageID.6, ¶ 20), but her convictions for Robbery While Armed with a Deadly Weapon were committed with threats and representations of imminent violence. 2011 WL 7574305; [*Petitioner*], 969 N.E.2d at 1036-1037.
- Petitioner's robberies were preceded by "eleven contacts with the juvenile justice system ... juvenile adjudications for battery resulting in bodily injury, operating a motor vehicle without ever receiving a license, conversion, operating while intoxicated causing endangerment, false informing". *Id.* at 1048; *see also* Doc. 1-4, PageID.34.
- She had previously violated probation and "dishonorably discharged from probation for lying to the juvenile court about being in college and submitting a falsified letter purporting to be from a college professor", and she "attempted to deceive electronic monitoring personnel by lying about being in school and trying to pass her boyfriend off

as her uncle." *Id.* The Court of Appeals of Indiana found that Petitioner's "character shows disrespect for the judicial process and disregard of the law." *Id.*

- While in prison, Petitioner racked up 63 violations, not all early in her tenure there, and including some for serious acts like battery, sexual harassment, and fleeing or interfering with staff. (Doc. 1-4, PageID.34.).
- After her release from prison, Petitioner re-entered this country in violation of the law, and then worked without authorization to do so. (*Id.*).
- As her sentencing court noted, her familial ties to the United States strongly suggest a real risk of recidivism. (Doc. 1-4, PageID.37.).
- As a repeat felony offender when prosecuted for illegal re-entry, Petitioner was subject to a sentence of 21-27 months under the sentencing guidelines, but the Court repeatedly explained its sympathy and leniency on the basis of her anticipated deportation. (Doc. 1-4, PageID.34, 36, 37, 38.).
- Petitioner avoided both supervised release and a fine on the basis of her anticipated deportation. (Doc. 1-4, PageID.38.).
- Having successfully portrayed her removal as near-certain in order to obtain the benefits of a shorter prison sentence, avoidance of a fine, and no supervised release, Petitioner now seeks to have it both ways and avoid that removal and the detention that goes along with it.

Petitioner makes other claims that are unlikely given the different narratives she offered when they suited her. Petitioner now claims she was trafficked by her grandparents (Doc. 1, PageID.5-6, ¶¶ 18-19), but her prior factual recitations cast serious doubt on that notion. Petitioner told her sentencing judge that her stepfather and mother abused her and made false claims to police about her. (Doc. 1-4, PageID.35.). Her mother and stepfather are also who showed up at the police station when she was arrested near her eighteenth birthday, and in an attempt to overturn her convictions, Petitioner litigated at length their role as her custodians in relation to her interrogation, without insinuating anything about her grandparents wresting her from her mother when she was eight years old or otherwise having custody or control over her. [*Petitioner*], 959 N.E.2d at 1037, 1040-1043. That alone is cause enough to severely doubt the veracity of her current claims about her grandparents wresting her from her mother at age eight and trafficking her up until the time of her arrest for her robberies, or any eligibility for immigration status based on that story. (Doc. 1, PageID.5-6, 9, ¶¶ 18-21, 30.).[1] Petitioner claims to have spent a total of approximately two months of her life in Mexico since the age of five, and to have no family or contacts in Mexico, making unlikely her belated claims that she would be subject to persecution or torture there. (Doc. 1, PageID.1, 7, ¶¶ 1, 22; Doc. 1-4, PageID.35, 36.).

Conclusion

The Court should dismiss the petition because Petitioner's detention is lawful and the Court lacks jurisdiction to review the claims she brings. Petitioner is an inadmissible criminal alien subject to mandatory detention after her removal and illegal re-entry. She was granted a temporary period of time out of custody to nurse a weeks-old newborn, but more than a year later the purpose of that temporary release was completed and she was lawfully detained pursuant to her lawfully issued Notice of Custody Determination and Warrant of Arrest.

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[1] As a convicted felon with a valid order of removal already issued against her, Petitioner's options for relief from removal are extremely limited. *Nwachukwu v. Holder*, 426 F. App'x 373, 375 (6th Cir. 2011) (aliens convicted of aggravated felonies or crimes of violence are not entitled to asylum or withholding of removal, only protection under the Convention Against Torture).

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CERTIFICATE OF SERVICE

I hereby certify that on August 5, 2025, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to the following:

/s/ Jason Snyder
Jason Snyder
Assistant United States Attorney