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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

Martin Coc Pacham,
Petitioner,

vs.

Gregory John Archambeault, ET AL,
Respondents.

Case No.: 3:25-cv-02081-TWR-KSC

**PETITIONER'S SUPPLEMENTAL
RESPONSE PURSUANT TO ECF
NO. 7**

Pursuant to the Court's Order dated November 21, 2025 (ECF No. 7), Petitioner hereby clarifies the factual history concerning his prior interactions with ICE. Petitioner has been apprehended by ICE only once. That apprehension occurred on August 14, 2025, when ICE agents detained Petitioner in Virginia after mistakenly attempting to arrest another individual at that same residence. Prior to August 14, 2025, Petitioner had never been arrested, detained, or taken into ICE custody, and he had never been released on his own recognizance by ICE or any immigration authority.

Paragraphs 51 and 89 of the Petition inadvertently created ambiguity by describing the government's broader practices of releasing similarly situated noncitizens on their own recognizance, but these paragraphs were not intended to represent that Petitioner personally had previously been detained or released by ICE. Rather, they referenced systemic practices relevant to the statutory analysis under 8 U.S.C. §§ 1225 and 1226.

/s/ Marcelo Gondim

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CERTIFICATE OF SERVICE

I hereby certify that on November 26, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record at the email addresses provided.

Date: November 26, 2025

/s/ Marcelo Gondim

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