

1 Emily L. Robinson Esq.
2 Law Office of Emily L. Robinson
3 5012 Eagle Rock Blvd.
4 Los Angeles, CA 90041
5 emily@lawofficeemilyrobinson.com
6 (323) 524-7611
7 (323) 524-4001

8 Counsel for Petitioner

9 UNITED STATES DISTRICT COURT FOR THE
10 EASTERN DISTRICT OF CALIFORNIA

11 JOSE PEDRO ORTEGA

12 Petitioner,
13 vs.

Case No. 1:25-CV-01663-DJC-CKD

14 Kristi NOEM, Secretary, U.S. Department of Homeland
15 Security;
16 Pamela BONDI, U.S. Attorney General; Todd LYONS,
17 Acting Director, Immigration and Customs
18 Enforcement; Sergio ALBARRAN, Acting Director, San
19 Francisco Field Office, Immigration and Customs
20 Enforcement, Enforcement and Removal Operations;
21 Minga WOFFORD, Warden, Mesa Verde ICE Processing
Center; EXECUTIVE OFFICE FOR IMMIGRATION
REVIEW; IMMIGRATION AND CUSTOMS
ENFORCEMENT; and U.S. DEPARTMENT OF
HOMELAND SECURITY,

Respondents

PETITIONER'S REPLY TO
RESPONDENT'S OPPOSITION
TO PETITIONER'S EX PARTE
APPLICATION FOR
TEMPORARY RESTRAINING
ORDER

1 Petitioner files this reply to address several factual inaccuracies and legal errors in
2 Respondents' opposition. Respondents' position depends on the premise that Petitioner's
3 classification as an "arriving alien" permanently eliminates the liberty interests that arise from
4 seven years of government-authorized release into the community. Courts have consistently
5 rejected this position. The Constitution protects "all persons" within the United States, and the
6 Supreme Court has repeatedly emphasized that physical detention constitutes a profound
7 deprivation of liberty that cannot be imposed without due process. Respondents' arguments
8 disregard this binding precedent, rely on inconsistent and unreliable factual assertions, and
9 misstate both the procedural obligations governing revocation of release and the scope of this
10 Court's habeas authority.

11 **I. RESPONDENTS ERRONEOUSLY CLAIM THAT ICE WAS JUSTIFIED IN**
REDETAINING HIM DUE VIOLATIONS OF THE ISAP PROGRAM

12 Respondents assert that revocation of Petitioner's ISAP/OREC was justified due to
13 "repeated violations" of the program. Respondents contend that ICE acted "reasonably"
14 in re-detaining Petitioner based on alleged ISAP violations. ECF 9 at 1, 4. The record
15 does not support this claim. Instead of providing contemporaneous or reliable evidence of
16 noncompliance, Respondents rely on post-hoc assertions that are internally inconsistent,
17 contradicted by their own evidence, and inconsistent with Petitioner's 7 years of
18 compliance under supervision.

19 It should be noted that Petitioner entered the United States in 2018. He was trusted
20 enough by ICE to have his ankle monitor removed over a period of about two years. He
21 had no notice or reason to believe that ICE had issues with his compliance with his
conditions for release, especially given that he himself reported right away when it was

1 requested of him on the day he was detained. Further, Petitioner furnished his own proof
2 of compliance and livescan results showing no criminal history. The government has not
3 alleged dangerousness.

4 Respondents' brief asserts that Petitioner committed "four" violations between
5 August 2023 and March 2025. ECF 9 at 4. They state in their introduction "Petitioner's
6 repeated violations of the Intensive Supervision Appearance Program ("ISAP") justified
7 Immigration and Custom Enforcement's ("ICE") decision to re-detain him" ECF 9 at 1.
8 The argument then later goes on to state that between August 2023 and March 2025
9 "Petitioner **incurred four compliance violations** including missing check-ins and
10 checking in from outside of the authorized zone." To support these claims, they file a
11 declaration from Christopher. T. Jerome (Jerome Decl.) which was created expressly for
12 the purpose of these proceedings and to justify Respondents violation of Petitioner's
13 administrative, procedural and constitutional rights. The Jerome Declaration that they
14 rely on as the source of evidence, however, states that Petitioner missed "**at least three**"
15 scheduled check-ins. Jerome Decl. ¶ 7. Neither the declaration nor the exhibits identify
16 four violations, describe their nature, or provide any documentation showing Petitioner
17 was informed of them. Nor do Respondents provide any evidence that Petitioner failed to
18 comply with reporting requirements on the date of his arrest; in fact, the record confirms
19 that he reported immediately when asked. The Jerome Declaration also makes no
20 reference at all to "authorized zones."

21 Even more problematic is Respondents' reliance on an I-213 created on September
20, 2025, which states only that Petitioner "violated the conditions" of ERO's ATD
program "from August 10, 2023, to March 21, 2025." ECF 9, Ex. 4. The document makes

1 no mention of “four violations” which is put forward in the brief, nor “three” violations
2 “at regularly scheduled check-ins” as stated in the Jerome declaration. It states no number
3 at all, nor the nature of those violations. No other sources of information regarding
4 violations are referenced.

5 This document cannot be relied upon for its purported purpose, because, amongst
6 other issues, it contains many material defects. Despite the Notice to Appear (produced
7 by both Petitioner and Respondent), the release documents produced by Respondents,
8 and conditions for release stating that Petitioner is an “arriving alien” and was “paroled.”
9 The I-213 dated September 20, 2025, incorrectly states that Petitioner last entered the
10 United States “without inspection,” even though ICE’s own parole and release documents
11 confirm he presented himself at a port of entry and was paroled as an arriving alien. It
12 also misgenders Petitioner and includes contradictory information about his entry and
13 parole status. These errors demonstrate that the I-213 was prepared hastily and cannot
14 serve as a reliable basis for revoking seven years of lawful release.

15 Respondents also rely on a supposed “authorized zone” violation, yet no document in
16 the record identifies any geographic restrictions applicable to Petitioner. The 2018 Notice
17 of Release and Proof of Service, provided by Respondents, contains no such limitation.
18 ECF 9, Ex. 3. Respondents therefore attempt to justify detention based on unstated
19 conditions that were never communicated to Petitioner.

20 Petitioner recalls isolated technical issues over the span of seven years, one involving
21 an ankle monitor and one involving the ISAP phone application. In these instances, he
immediately resolved the problem with ICE. Temporary technological issues are
common within ISAP and are not evidence of noncompliance. DHS’s own Privacy

1 Impact Assessment acknowledges that SmartLINK and GPS monitoring produce false
2 alerts, location drift, and other technical malfunctions. Respondents present no evidence
3 that any alleged violation was contemporaneously treated by ICE as noncompliance or
4 that it led to any modification of his supervision.

5 Respondents have therefore failed to identify any credible basis for concluding that
6 Petitioner violated the conditions of his release, much less that such alleged violations
7 justified the sudden deprivation of liberty after seven years of compliance. The
8 inconsistencies in Respondents' evidence, combined with the absence of
9 contemporaneous enforcement action, confirm that these allegations cannot support re-
detention.

10 **II. RESPONDENTS ERRONEOUSLY ALLEGE THAT PETITIONER HAD NO**
11 **LIBERTY INTEREST AND WAS THEREFORE NOT ENTITLED TO NOTICE**
OR A PRE-DEPRIVATION HEARING

12 Respondents argue that Petitioner's "arriving alien" status permanently deprives him of any
13 liberty interest, rendering due process protections inapplicable to the revocation of his release.
14 ECF 9 at 8. This argument is contrary to binding Supreme Court and Ninth Circuit precedent.
15 Petitioner has been released in the interior for a period of seven years. Petitioner has been living
16 freely in the community without issue for those years. He has a lawful spouse and three minor
17 children who he entered with but is now apart from. His children are enrolled in U.S. schools, he
18 and held a job to support his wife and children. Authorities made the decision to use their
19 discretion to parole Respondent and his family from custody following their entry. They
20 demonstrate that detention of Petitioner is a choice given that he entered with his family unit, yet
he is the only person now "mandatorily" detained without notice or explanation.

1 The “entry fiction” doctrine is a narrow legal construct developed for determining an
2 individual’s status at the threshold of admission. It has never been applied to eliminate
3 constitutional protections against physical confinement for individuals who have been living
4 openly within the United States for years. The Supreme Court has repeatedly held that
5 noncitizens physically present in the United States, regardless of their admission status, are
6 entitled to due process protections. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). The Ninth
7 Circuit has likewise made clear that any noncitizen detained inside the United States possesses a
8 liberty interest in freedom from physical restraint. *Hernandez v. Sessions*, 872 F.3d 976, 990 (9th
9 Cir. 2017).

10 Petitioner has been present in the United States since 2018. His children have truly grown up
11 here. He has complied with ICE for seven years, worked to support his family, and lived under
12 the very conditions that give rise to a constitutionally protected conditional liberty interest. He
13 has not yet had his individual hearing (which was to be a family unit case), and has not missed
14 any immigration obligations. Over the course of years, ICE repeatedly reviewed and renewed his
15 release, demonstrating its own longstanding view that he posed neither a danger nor a flight risk.
16 Courts evaluating re-detention after extended release have rejected the proposition that arriving-
17 alien status eliminates due process protections.

18 In *E.A.P.C. v. Wofford*, the court held that even a person processed under section 1225(b)
19 acquires a constitutionally protected liberty interest upon release and is therefore entitled to
20 procedural safeguards before that liberty may be revoked. *E.A.P.C. v. Wofford*, No. 1:25-cv-
21 01546, 2025 U.S. Dist. LEXIS 232066 (E.D. Cal. Nov. 25, 2025). It also stands for the
proposition that there must be judicial scrutiny in the retroactive application of mandatory
detention statutes. *Id.* Respondents’ argument collapses this established principle and would

1 permit ICE to re-detain any paroled noncitizen at any time without process, regardless of the
2 length of release or degree of integration into the community. The Constitution does not allow
3 such unfettered executive authority.

4 **III. RESPONDENTS INCORRECTLY CLAIM THAT MATHEWS CANNOT APPLY**
5 **AND MISSTATE THE BALANCING FRAMEWORK**

6 Respondents assert that *Mathews v. Eldridge* “does not appear to govern due process
7 claims raised by detained aliens.” ECF 9 at 9. That assertion is incorrect. The Ninth Circuit has
8 repeatedly applied *Mathews* to immigration detention, including in cases addressing bond
9 hearings, re-detention, and revocation of conditional liberty. Cases like *Singh v. Holder*,
10 *Hernandez v. Sessions* all rely on *Mathews* as the governing standard for determining what
11 process is due when the government deprives a noncitizen of liberty.

12 As argued in Petitioner’s Motion for TRO, *Mathews* requires courts to evaluate three
13 factors: the private interest affected by the official action, the risk of erroneous deprivation under
14 existing procedures, and the government’s interest. The private interest here is the most
15 fundamental recognized by the Constitution, freedom from physical confinement. Both the
16 Supreme Court and the Ninth Circuit have recognized that even brief civil detention constitutes a
17 significant deprivation of liberty requiring heightened procedural protection. The risk of
18 erroneous deprivation is exceptionally high where, as here, ICE relies on ambiguous,
19 unadjudicated, and internally inconsistent allegations of ISAP violations. Respondents’ evidence
20 consists of a defective I-213 and a declaration that contradicts their own brief and fails to identify
21 any verifiable noncompliance. Courts have recognized that reliance on ISAP data in the absence
of individualized review dramatically increases the risk of erroneous deprivation, particularly

1 given ISAP's known technical failures- should that even be the basis for Respondents assertions
2 of non-compliance.

3
4 The government's interest in detaining Petitioner is minimal. ICE itself determined for
5 seven years that Petitioner could be safely supervised in the community. He has never missed a
6 hearing, never absconded, and has deep family ties. The government's interest in avoiding a brief,
7 neutral pre-deprivation review does not outweigh Petitioner's liberty interest, particularly given
8 the absence of any evidence that he poses danger or is likely to flee. Respondents' suggestion that
9 mandatory detention provisions eliminate *Mathews* review conflates statutory authority with
10 constitutional permissibility. The Supreme Court has never held that section 1225(b) authorizes
11 the Government to disregard procedural due process in re-detention, and lower courts have
12 rejected such arguments in the context of revoking long-standing release. Respondents' assertion
13 that mandatory detention nullifies due process analysis is circular and conflates statutory silence
14 with constitutional permissibility.

15
16 **IV. RELEASE ON OREC CREATES A PROTECTED LIBERTY INTEREST THAT**
17 **CANNOT BE REVOKED ARBITRARILY**

18 When the Government releases an individual on parole, OREC, or other supervised status,
19 that person acquires a conditional liberty interest protected by the Due Process Clause. Courts
20 have consistently applied the teachings of *Morrissey v. Brewer*, *Gagnon v. Scarpelli*, *Young v.*
21 *Harper*, and *Zinerman v. Burch* to recognize that conditional liberty, once granted, may not be
revoked without notice and an opportunity to be heard. The same principle applies in the
immigration context. The Ninth Circuit has held that due process attaches to the revocation of
immigration release, and district courts have ordered pre-deprivation hearings when ICE attempts

1 to re-detain individuals who have lived for years at liberty. Respondents attempt to state that
2 Petitioner effectively has no due process rights that attach ever because he entered as an “arriving
3 alien,” which would give the government the authority to take any arriving alien into custody at
4 any time, without notice, irrespective of the ties they have made within the United States.

5 Section 1226(b) allows the Attorney General to revoke release, but that authority is
6 constrained by constitutional limits and by the long-established requirement that re-detention be
7 supported by changed circumstances. *Saravia v. Sessions*, 280 F. Supp. 3d 1168, 1197 (N.D. Cal.
8 2017), *aff’d*, 905 F.3d 1137 (9th Cir. 2018). Contrary to Respondents’ assertion that the
9 Government may revoke release “at any time” without any showing of changed circumstances,
10 see ECF 9 at [pinpoint], *Saravia* rejected that interpretation and held that § 1226(b)’s “at any
11 time” language is constitutionally constrained: ICE must demonstrate a material change in
12 circumstances, such as new evidence of dangerousness or flight risk, before re-detaining an
individual who has long lived at liberty.

13 Courts have found that even where the Government alleges prior violations, a noncitizen
14 is entitled to notice and an opportunity to contest those allegations before liberty is revoked.
15 *J.C.E.P. v. Wofford*, No. 1:25-cv-01559, 2025 WL 3268273, at *6 (E.D. Cal. Nov. 24, 2025).
16 Respondents’ attempt to avoid these requirements by invoking arriving-alien status has no basis
17 in law. The Supreme Court has identified only two valid purposes for civil immigration
18 detention: preventing danger to the community and ensuring appearance. Respondents have
19 offered no evidence that either purpose applies here. *Zadvydas*, 533 U.S. at 690–92; *Demore v.*
20 *Kim*, 538 U.S. 510, 519–20 (2003). Their reliance on section 1225(b) as an all-purpose
21 justification is misplaced.

1
2 V. **THE GOVERNMENT IGNORES CONTROLLING PRECEDENT**
3 **RECOGNIZING THAT RE-DETENTION AFTER YEARS OF RELEASE**
4 **TRIGGERS HEIGHTENED DUE PROCESS PROTECTIONS**

5 Respondents' opposition disregards the central constitutional principle that even in the
6 immigration context, individuals are entitled to procedural due process protections when their
7 liberty is at stake. The Ninth Circuit has recognized that the Executive's detention authority is not
8 limitless and that re-detention after prolonged release requires individualized review, notice, and
9 an opportunity to be heard. The recent decisions in this district and others reflect a consistent and
10 growing recognition that ICE may not summarily revoke long-standing conditional liberty based
11 on unadjudicated or temporally remote allegations.

12 In *Perez v. Albarran*, a case arising in this same district and involving materially similar
13 circumstances, the court reaffirmed that noncitizens living freely under government supervision
14 possess a constitutionally protected liberty interest in remaining outside of custody. *Perez v.*
15 *Albarran*, No. 1:25-cv-01540-DAD-CSK (HC), 2025 U.S. Dist. LEXIS 224966; 2025 WL
16 3187578 (E.D. Cal. Nov. 14, 2025). The court emphasized that years of compliance and
17 community integration cannot be undone arbitrarily and that re-detention without a pre-
18 deprivation hearing violates the Due Process Clause. *Perez* underscores that where liberty has
19 vested, the Government must provide meaningful process before revoking it. The Executive's
20 discretion in the removal context does not extinguish constitutional constraints once due process
21 protections have attached.

18 The same principle was applied in *P.T. v. Hermosillo*, where the court granted habeas relief
19 after ICE re-detained an individual based on allegations that were both unadjudicated and
20 temporally remote. *P.T. v. Hermosillo*, 2025 U.S. Dist. LEXIS 232755 (W.D. Wash. Nov. 26,
21 2025). The court found that the lack of a contemporaneous hearing and the absence of timely

1 notice rendered the re-detention constitutionally infirm. It ordered the petitioner's immediate
2 release and prohibited future re-detention without first providing a hearing before a neutral
3 decisionmaker. *P.T.* makes clear that due process is not satisfied by merely notifying an
4 individual that ICE intends to re-detain him; rather, the Constitution requires an individualized
5 determination of flight risk or danger before liberty may be withdrawn, particularly where the
6 alleged violations are old, disputed, or never previously deemed significant enough to warrant
7 enforcement action.

8 Both *Perez* and *P.T.* reject the Government's attempt to stretch *Demore v. Kim* beyond its
9 narrow context. *Demore* was expressly limited to the constitutionality of brief, initial detention of
10 recently apprehended noncitizens and did not authorize the Executive to resurrect detention years
11 after release without affording procedural protections. Attempting to expand *Demore* to justify
12 the sudden confinement of long-released individuals collapses the distinction between initial
13 apprehension and revocation of conditional liberty. Courts have refused to endorse such an
14 expansive reading. Judicial scrutiny is essential in this context, where the Government invokes
15 mandatory detention as a talisman to avoid the constitutional requirement of individualized
16 process.

17 These authorities collectively confirm that physical detention constitutes a severe deprivation
18 of liberty requiring careful procedural safeguards. Re-detention after years of government-
19 sanctioned liberty is an even more significant intrusion. Respondents' failure to confront this
20 body of law, and their insistence that arriving-alien status permits re-detention at will, is
21 inconsistent with the Constitution and with the decisions of courts that have considered these
precise issues. The Due Process Clause requires individualized findings, notice, and a meaningful
opportunity to contest the basis for re-detention. Respondents provided none.

1
2 **VI. THE FOURTH AMENDMENT PROHIBITS ICE FROM RE-ARRESTING**
3 **PETITIONER WITHOUT NEW PROBABLE CAUSE OR INDIVIDUALIZED**
4 **SUSPICION**

5 Respondents fail to address Petitioner's Fourth Amendment argument, which independently
6 renders his re-detention unlawful. Once Petitioner was released and allowed to live at liberty for
7 seven years, any authority to detain him again required new, particularized justification grounded
8 in individualized suspicion which is something not present in this case.

9 Courts have rejected attempts by the Government to rely on immigration status alone as an
10 ongoing basis for warrantless arrest. The Ninth Circuit has repeatedly held that detention must be
11 justified by specific, articulable facts at the moment of seizure rather than by status-based or
12 categorical assertions. Petitioner's seven-year period of lawful presence under ICE supervision
13 extinguished any claim that the Government may rely on his original apprehension to justify a
14 new seizure. During that time, ICE never alleged danger, never claimed Petitioner was a flight
15 risk, and never sought to modify or revoke his release. Conditions of release were only reduced,
16 which shows compliance. The only thing that has changed is the administration's new policy that
17 any and all noncitizen is mandatorily detainable or should have their supervision revoked without
18 process. Respondents now point only to ambiguous, unsubstantiated assertions of ISAP
19 noncompliance, none of which is supported by contemporaneous documentation or any indication
20 that ICE deemed them significant at the time. These allegations cannot retroactively supply the
21 probable cause required for a warrantless arrest.

Even assuming ICE has statutory authority to revoke parole or OREC, that authority cannot
override the Fourth Amendment's fundamental protections. The Government may not effectuate
a new arrest based solely on a years-old basis for custody, particularly where the individual has

1 demonstrated consistent compliance with supervision and where no new facts suggest danger or
2 flight risk. The implications of indicating someone entering as an arriving alien is forever
3 stripped of liberty interests would be devastating.

4 Respondents' silence on this issue underscores the constitutional deficiency of their position.
5 Nothing in the record supports a finding of probable cause for a new arrest on September 20,
6 2025. Petitioner's re-detention is unlawful for the independent reason that it was carried out
7 without the contemporaneous, individualized justification the Constitution demands.

8
9 **VII. THE BALANCE OF EQUITIES AND PUBLIC INTEREST FAVOR**
10 **PETITIONER, AND RESPONDENTS' ARGUMENTS REGARDING THE**
11 **SCOPE OF HABEAS RELIEF MISSTATE THE LAW**

12 Respondents argue that the balance of equities and the public interest weigh against granting
13 relief and further contend that the remedy Petitioner seeks exceeds the permissible bounds of
14 habeas jurisdiction. Both arguments overlook the fundamental principles governing unlawful
15 executive detention, the constitutional limits on ICE's authority, and the history and purpose of
16 habeas corpus as a safeguard against arbitrary confinement.

17 The public interest is best served when the Government complies with the Constitution.
18 Courts have repeatedly held that there is no public interest in the enforcement of an
19 unconstitutional policy or practice. The balance of equities weighs strongly in favor of Petitioner,
20 who has lived peacefully in the United States for seven years, raised his children here, complied
21 with supervision, and demonstrated no risk of flight or danger. Continued detention separates him
from his wife and three minor children, deprives them of financial and emotional stability, and
inflicts immediate and irreparable harm. In contrast, Respondents identify no concrete harm to the

1 Government from providing the minimal procedural protection Petitioner seeks. The Government
2 supervised Petitioner in the community for years and offers no explanation as to why a brief
3 hearing before a neutral arbiter would undermine immigration enforcement. The equities
4 therefore fall decisively on Petitioner's side.

5 The Supreme Court has long recognized that the deprivation of bodily liberty is a severe form
6 of state action requiring heightened procedural safeguards. This is particularly true when, as here,
7 the Government seeks to revoke conditional liberty already conferred after years of successful
8 compliance. The public interest is in ensuring that detention decisions are not executed arbitrarily.
9 The Constitution does not permit the Executive to subject individuals to sudden arrest and
10 confinement based on untested and remote allegations, nor does it grant ICE unlimited discretion
11 to revise past release determinations without meaningful review. Courts in this district and
12 throughout the Ninth Circuit have increasingly scrutinized such practices, recognizing that ICE's
13 recent pattern of re-detaining long-released individuals raises significant constitutional concerns.
14 Judicial oversight is especially critical when administrative mechanisms permit broad and
unreviewed exercises of executive power.

15 Respondents' contention that Petitioner's requested remedy exceeds the bounds of habeas
16 relief is also inaccurate. Petitioner seeks immediate release from unlawful custody or, in the
17 alternative, a pre-deprivation custody hearing. Both are well within the traditional scope of
18 habeas jurisdiction. The Supreme Court has consistently described the core purpose of habeas as
19 providing a mechanism for individuals to challenge unlawful physical restraint and obtain
20 release. Habeas courts routinely order individualized bond hearings as a remedy for due process
21 violations, recognizing that such hearings are necessary to cure an unlawful deprivation of liberty.

1 Nothing in *Department of Homeland Security v. Thuraissigiam* alters this principle.

2 *Thuraissigiam* addressed limitations on judicial review of removal orders and did not involve
3 detention, challenge the deprivation of physical liberty, or purport to narrow habeas courts'
4 authority to order release. Petitioner does not seek to control ICE's detention practices on a
5 systemic basis, nor to bind the agency's conduct with respect to individuals not before the Court.
6 He seeks relief only as applied to his individual case, consistent with longstanding habeas
7 jurisprudence.

8 Because Respondents cannot identify any statutory or constitutional impediment to release or
9 to a pre-deprivation hearing, and because the public interest overwhelmingly favors ensuring that
10 liberty is not withdrawn without due process, this factor supports granting the requested relief.

11 **VIII. RENEWED REQUEST FOR ORDER**

12 Petitioner has demonstrated a likelihood of success on the merits, irreparable harm, and the
13 balance of equities and public interest strongly favoring relief. For seven years, ICE determined
14 that Petitioner could reside safely in the community under minimal supervision. Respondents
15 now seek to revoke his liberty without credible evidence, without notice, and without any
16 procedural safeguards. The Constitution does not permit such an abrupt and unjustified
17 deprivation of liberty.

18 Petitioner respectfully renews his request that this Court order his immediate release under
19 the status quo conditions that existed prior to September 20, 2025 (which is no GPS monitoring),
20 and enjoin Respondents from re-detaining him absent further order of the Court or a pre-
21

1 deprivation hearing before a neutral decisionmaker at which Respondents bear the burden of
2 proving, by clear and convincing evidence that he is a flight risk or a danger to the community.
3
4

5 **RESPECTFULLY SUBMITTED**

6 /s/ Emily L. Robinson
7 Law Office of Emily L. Robinson
8 5012 Eagle Rock Blvd.
9 Los Angeles, CA 90041
10 (O) (323) 524-7611
11 Emily@lawofficeemilyrobinson.com
12
13
14
15
16
17
18
19
20
21