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Attorney for Petitioner

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

JORGE SERRATO HERRERA

Petitioner,

v.

Warden of ADELANTO DETENTION FACILITY; *Ernesto Santacruz Jr in his official Capacity as Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations* ADELANTO DETENTION FACILITY; KRISTI NOEM, *in her official capacity as Secretary of the U.S. Department of Homeland Security;* and PAM BONDI, *in her official capacity as Attorney General of the United States*,

Respondents.

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. This petition for Writ of Habeas Corpus filed on behalf of Petitioner Jorge Serrato Herrera ("Petitioner") to remedy his unlawful detention.
2. Petitioner is a 36-year-old citizen of Mexico. [*See* Exhibit A: "Birth Certificate for Petitioner Jorge Serrato Herrera]
3. On September 29, 2025, Petitioner was taken into custody and is currently detained at the Adelanto Detention Facility.
4. Petitioner is currently in removal proceedings at the Adelanto Immigration Court, Executive

Office for Immigration Review (EOIR). He intends to seek asylum relief before that court, on the basis of a well-founded fear of harm and persecution if returned to Mexico.

5. In addition, Petitioner is a former DACA recipient who has demonstrated good moral character. He graduated from Bell High School and has consistently shown himself to be a hardworking and responsible individual. He has lived in the United States since he was around a year old, entering in 1990. He has no meaningful ties in Mexico and fears harm and persecution if he were returned.

6. On November 04, 2025, he was denied release on bond due to "lack of authority," under the Board's intervening precedent in *Matter of Yajure Hurtado*, 29 I&N Dec. 216, 220-29 (BIA 2025), leaving him in continued custody without a constitutionally adequate opportunity to seek release. [*See* Exhibit C: "Order of the Immigration Judge Denying Redetermination of Custody"].

7. Accordingly, Petitioner respectfully requests that this Court order Respondents to provide him with a prompt and constitutionally adequate bond hearing before an Immigration Judge, or, in the alternative, to release him from custody if such a hearing is not provided within a reasonable period.

JURISDICTION

8. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq*.

9. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

10. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et. seq*., the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq*., and the All Writs Act, 28 U.S.C. § 1651.

VENUE

11. Venue is proper in this district and division pursuant to 28 U.S.C. § 2241(c)(3) and 28 U.S.C. § 1391(b)(2) and (e)(1) because Petitioner is detained within this district Adelanto Detention Facility in Adelanto, California, which is within the jurisdiction of this District.

12. Venue is proper in this District because a substantial part of the events or omissions giving rise to this action occurred and continue to occur Adelanto Detention Facility in Adelanto, California. 28 U.S.C. § 1391(e).

REQUIREMENTS OF 28 U.S.C. § 2243

13. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return "within *three days* unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added).

14. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

PARTIES

15. Petitioner was arrested by ICE officers on September 29, 2025, and was transferred to Adelanto Detention Center where he is currently detained. He is in custody, and under the direct control, of Respondents and their agents.

16. The acting Warden of Adelanto Detention Facility has immediate physical custody of Petitioner pursuant to the facility's contract with U.S. Immigration and Customs Enforcement to detain noncitizens and is a legal custodian of Petitioner. Respondent is a

legal custodian of Petitioner.

17. Respondent Ernesto Santacruz Jr is sued in his official capacity as the Acting Director of the Los Angeles Field Office of U.S. Immigration and Customs Enforcement. Respondent Santacruz is a legal custodian of Petitioner and has authority to release him.

18. Respondent Kristi Noem is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security (DHS). In this capacity, Respondent Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees U.S. Immigration and Customs Enforcement, the component agency responsible for Petitioner's detention and custody. Respondent Noem is a legal custodian of Petitioner.

19. Respondent Pam Bondi is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that capacity, she has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review (EOIR), which administers the immigration courts and the BIA. Respondent Bondi is a legal custodian of Petitioner.

EXHAUSTION OF REMEDIES

20. Petitioner has exhausted all administrative remedies available to him. He is currently detained at the Adelanto Detention Facility under the custody of U.S. Immigration and Customs Enforcement ("ICE"). After his arrest, Petitioner sought release from custody through a bond request, which was denied by an Immigration Judge on November 04, 2025.

21. No further administrative process exists to challenge his ongoing detention or to obtain the relief sought. Petitioner does not challenge the discretionary denial of bond itself but rather the legality of his continued detention without a meaningful opportunity for release. Accordingly, the filing of this habeas corpus petition under 28 U.S.C. § 2241 is proper. *See Singh v. Holder*, 638 F.3d 1196, 1203–04 (9th Cir. 2011); *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001).

STATEMENT OF FACTS

22. Petitioner is a 36-year-old citizen of Mexico. [*See* Exhibit A: "Birth Certificate for Petitioner Jorge Serrato Herrera].

23. Petitioner has resided continuously and permanently in the United States since approximately the year 1990, having entered the country at or around the age of one.

24. On September 28, 2016, Petitioner was convicted of violating California Vehicle Code § 23152(b).

25. On September 29, 2025, Petitioner was taken into custody. [*See* Exhibit B: "Declaration for Petitioner Jorge Serrato Herrera]. ICE officers approached him early that morning as he was leaving his home for work. *Id.* Multiple officers wearing ICE vests surrounded him without showing a warrant, despite claiming they were acting "on a warrant." *Id.*

26. Petitioner did not confirm his identity and asked why they were there, but officers immediately handcuffed him, confiscated his personal belongings, and forced him into an unmarked vehicle with blacked-out windows. *Id.*

27. Officers subsequently transported him to a park, further restrained him at the wrists, waist, and legs, and then transferred him first to ICE's downtown Los Angeles facility and later that same day to Adelanto. *Id.*

28. During his detention, he sustained dental injuries that were left unaddressed for around a week. *Id.*

29. After Petitioner was detained by U.S. Immigration and Customs Enforcement (ICE) he was transferred to Adelanto Detention Facility where he has remained for almost two months, with no end in sight.

30. He is currently in removal proceedings and is in the process of submitting an asylum application filed with the Adelanto Immigration Court, EOIR. He seeks asylum relief before that court, on the basis of a well-founded fear of harm and persecution if returned to Mexico.

31. On November 04, 2025, he was denied release from custody under bond by the Immigration Judge based on the Courts alleged "lack of authority to conduct the bond hearing." under the Board's intervening precedent in *Matter of Yajure Hurtado*, 29 I&N Dec. 216, 220-29 (BIA 2025). [*See* Exhibit C: "Order of the Immigration Judge Denying Redetermination of Custody"].

32. ICE has not identified any exceptional circumstances warranting Petitioner's continued detention under ICE policy.

LEGAL FRAMEWORK

33. The Due Process Clause requires that the deprivation of Petitioners' liberty be narrowly tailored to serve a compelling government interest. See Reno v. Flores, 507 U.S. 292, 301–02 (1993) (holding that due process "forbids the government to infringe certain 'fundamental' liberty interests at all, no matter what process is provided, unless the infringement is narrowly tailored to serve a compelling state interest"). As the Supreme Court held in *Zadvydas*, indefinite detention, and detention without adequate procedural protections, would raise a "serious constitutional problem" and run afoul of the Due Process Clause. 533 U.S. at 690.

34. Section 1226(a) authorizes the Attorney General to arrest and detain a noncitizen "pending a decision on whether the alien is to be removed." Detention under § 1226(a) is discretionary and permits release on bond or conditional parole unless the person falls within the limited mandatory detention provisions of § 1226(c). The Ninth Circuit has held that individuals detained under § 1226(a) are entitled to individualized bond hearings where the government bears the burden to show, by clear and convincing evidence, that continued detention is justified by flight risk or danger. *Rodriguez v. Robbins*, 804 F.3d 1060, 1078 (9th Cir. 2015), vacated on other grounds, *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018). When detention under § 1226(a) becomes prolonged, it must remain reasonably related to its purposes of

ensuring appearance and protecting the community. See *Demore v. Kim*, 538 U.S. 510, 531 (2003); *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Continued detention without a final order of removal, absent these justifications, is arbitrary, excessive, and violates the Due Process Clause.

35. On September 5, 2025, the Board of Immigration Appeals issued *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (B.I.A. 2025). The Board held that any noncitizen present in the United States without inspection or admission is subject to detention under INA § 235(b)(2) (8 U.S.C. § 1225(b)(2)), rather than § 236(a) (8 U.S.C. § 1226(a)). This interpretation treats all such noncitizens as "applicants for admission" and places them in mandatory detention without bond eligibility before immigration judges.

36. The decision overruled longstanding agency practice that classified interior arrests of noncitizens who entered without inspection under INA § 236(a) (8 U.S.C. § 1226(a)), which permits discretionary release on bond or parole. Under Yajure Hurtado, only those noncitizens who have been formally "admitted," as defined in INA § 101(a)(13)(A), retain bond eligibility.

CLAIMS FOR RELIEF

COUNT ONE
Violation Of Immigration and Nationality Act, 8 U.S.C. § 1226(a)

37. Petitioner realleges and incorporates by reference the paragraphs above.

38. 8 U.S.C. § 1226(a) authorizes the Attorney General to arrest and detain a noncitizen "pending a decision on whether the alien is to be removed," but expressly permits release on bond or conditional parole. This provision governs the detention of individuals, like Petitioner, who have not been ordered removed and whose proceedings remain pending.

39. Detention under § 1226(a) must remain reasonably related to its purposes of ensuring appearance at removal proceedings and protecting the community. When those justifications

no longer apply, continued custody exceeds the scope of the statute. See *Demore v. Kim*, 538 U.S. 510, 529–31 (2003); *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

40. The Supreme Court in *Jennings v. Rodriguez,* 583 U.S. 830 (2018), distinguished between the discretionary detention authority in § 1226(a) and the mandatory detention provisions of § 1226(c). *Jennings* held that § 1226(a) allows for release on bond or conditional parole and does not itself impose mandatory custody. While the Court rejected the imposition of automatic, periodic bond hearings as a matter of statutory interpretation, it left open the constitutional question of whether prolonged detention without an individualized hearing violates due process. *See id.* at 851 (remanding to consider constitutional claims).

41. Subsequent courts have recognized that such prolonged detention without a hearing raises serious due process concerns. See *Hernandez-Lara v. Lyons,* 10 F.4th 19, 41 (1st Cir. 2021) (holding that due process requires the government to justify continued § 1226(a) detention by clear and convincing evidence of danger or by a preponderance of evidence of flight risk).

42. Petitioner is detained under 8 U.S.C. § 1226(a), which governs pre-final-order detention for individuals in ongoing removal proceedings. Respondents' continued detention of Petitioner without affording a bond hearing violates § 1226(a)'s plain language and structure. Detention under § 1226(a) must be justified by legitimate governmental interests, however Respondents have not demonstrated that Petitioner presents a flight risk or danger to the community, making his continued detention is arbitrary, excessive, and contrary to law.

43. Following *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (B.I.A. 2025), Respondents have adopted a blanket interpretation that classifies all noncitizens who entered without inspection as subject to mandatory detention under § 1225(b), thereby denying bond eligibility to those properly detained under § 1226(a). This interpretation is inconsistent with the statute and longstanding practice, resulting in the unlawful denial of individualized bond determinations.

44. Notably, The Central District of California has rejected DHS's attempt to treat interior-arrest

noncitizens as mandatory detainees under § 1225(b). (*Maldonado Bautista v. Santacruz*, No. 5:25-cv-01873, TRO Order (C.D. Cal. July 28, 2025)). In *Maldonado Bautista v. Santacruz*, the court granted a Temporary Restraining Order enjoining DHS from detaining similarly situated individuals without providing an individualized § 1226(a) bond hearing, holding that DHS's reliance on § 1225(b) for interior arrests was unconvincing and inconsistent with the statutory framework. *Id.* The court concluded that individuals arrested inside the United States and detained under § 1226(a) were being unlawfully deprived of the procedural protections guaranteed by that statute, including a bond hearing before a neutral adjudicator. *Id.*

45. Here, Petitioner is in the same posture as the Petitioners in *Maldonado Bautista*. He was arrested in the interior and denied a bond hearing solely because DHS asserted § 1225(b) applied. Under *Maldonado Bautista*, such detention is unlawful, and Petitioner is entitled to habeas relief directing the government to provide a prompt § 1226(a) bond hearing or order his release.

46. Petitioner has strong family and community ties in the United States. He has lived in the United States nearly his entire life. [*See* Exhibit D: "Good Moral Character Documents for Petitioner Jorge Serrato Herrera"]. He is an active member of his church. He has one DUI conviction that does not render him a danger to the community and does not fall within the mandatory-detention provisions of § 1226(c). Because Petitioner is detained under § 1226(a), the statute affords him the right to seek release on bond upon an individualized determination. Respondents' refusal to provide such a hearing contravenes § 1226(a)'s discretionary framework and exceeds the limited detention authority Congress provided.

47. Accordingly, the Court should declare that Respondents lack statutory authority to detain Petitioner under § 1226(a) without providing a constitutionally adequate bond hearing and should order either (1) a prompt bond hearing before an Immigration Judge at which the

government bears the burden of proof, or (2) Petitioner's release from custody pursuant to 28 U.S.C. § 2241.

COUNT TWO
Violation of Fifth Amendment Due Process Clause

48. The allegations in the above paragraphs are realleged and incorporated herein.

49. The Due Process Clause of the Fifth Amendment forbids the government from depriving any person of liberty without due process of law. U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty" that the Due Process Clause protects. *Zadvydas*, 533 U.S. at 690 (citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)). Civil immigration detention violates due process if it is not reasonably related to its statutory purpose. See id. at 690 (citing *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). In the immigration context, the Supreme Court has recognized only two valid purposes for civil detention: to mitigate the risk of flight and prevent danger to the community. Id.; *Demore v. Kim*, 538 U.S. 510, 514–15, 528 (2003). Courts have further held that prolonged detention under 8 U.S.C. § 1226(a) implicates due process and requires the government to justify continued confinement at a meaningful bond hearing. See *Hernandez-Lara v. Lyons*, 10 F.4th 19, 41 (1st Cir. 2021) (requiring the government to prove danger by clear and convincing evidence or flight risk by a preponderance of the evidence).

50. The due process concerns identified in *Maldonado Bautista v. Santacruz* further demonstrate that Respondent's continued detention without a bond hearing is unconstitutional. In granting the TRO, the court found that DHS's misapplication of § 1225 deprived interior-arrest noncitizens of the legal protections guaranteed under § 1226(a), raising "serious question[s]" as to whether DHS had permissibly altered its detention practices to withhold statutory and constitutional safeguards. TRO Order at 5–7. The court emphasized that continued detention

under an unlawful policy serves "neither equity nor the public interest," and "potentially arbitrarily violates .... due process rights." *Galvez v. Jaddou*, 52 F.4th 821, 832 (9th Cir. 2022); see also *Xuyue Zhang v. Barr*, 612 F. Supp. 3d 1005, 1017 (C.D. Cal.) (public interest is implicated whenever constitutional rights are denied). As in *Maldonado Bautista*, Respondent's detention under the incorrect statutory framework deprives him of the procedural protections mandated by § 1226(a), rendering his continued detention fundamentally inconsistent with the Fifth Amendment. This concern is heightened because Respondent was previously denied a bond hearing based on *Matter of Yajure-Hurtado*, which relied on the same misapplication of § 1225(b) that the district court rejected.

51. First, Petitioner does not pose a danger to the community. Petitioner has lived in the United States almost his entire life, arriving at approximately one year old, and has built deep ties to his family, community, and church. He previously held DACA status, reflecting both his strong equities and his compliance with U.S. immigration requirements. Petitioner is a high-school graduate, a consistent and reliable worker, and an active member of his church community. [*See* Exhibit D: "Good Moral Character Documents for Petitioner Jorge Serrato Herrera"]. He has a DUI conviction that does not render him a danger to the community and falls outside the mandatory-detention provisions of § 1226(c). However, overall, these long-standing connections highlight his stability, responsibility, and commitment to remaining in lawful contact with the court. *Id.*

52. Second, Petitioner does not pose a risk of flight. He has maintained a consistent residence and strong familial and community support network. *Id.* He has fired counsel, Alfonso Morales, to represent him in his immigration matters. He is currently in the process of submitting an asylum application, further demonstrating his compliance with immigration procedures and his commitment to resolving his case lawfully through the judicial process. Prior to his detention, he worked regularly. *Id.* His family's reliance on him for financial and

emotional support demonstrates stability, accountability, and deep roots in the community. *Id.* These factors establish that Petitioner can and will comply with any conditions of release set by the Court or an Immigration Judge.

53. For these reasons, Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment, and he must be immediately released. The Court should order Respondents to provide Petitioner with a prompt and constitutionally adequate bond hearing before an Immigration Judge, at which the Government bears the burden of demonstrating flight risk or danger.

COUNT FOUR
Request for Attorney's Fees Under the Equal Access to Justice Act

54. If he prevails, Petitioner requests attorney's fees and costs in the amount of $5,000 under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

(1) Assume jurisdiction over this matter.

(2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.

(3) Declare that Petitioners' detention violates the Immigration and Nationality Act, Due Process Clause of the Fourth Amendment, Due Process Clause of the Fifth Amendment.

(4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately.

(5) Enjoin Respondents from further unlawfully detaining Petitioners.

(6) Grant a writ of habeas corpus ordering Respondents to immediately release Petitioners from custody.

(7) In the alternative, grant a writ of habeas corpus ordering Respondents to immediately release Petitioners from custody under reasonable conditions of supervision.

(8) In the alternative, grant a writ of habeas corpus ordering Respondents to provide Petitioner with a prompt and individualized bond determination hearing pursuant to 8 U.S.C. § 1226(a), before a neutral Immigration Judge, at which the Government bears the burden of proving that Petitioner is a danger to the community by clear and convincing evidence or a flight risk by a preponderance of the evidence.

(9) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law and

(10) Grant any further relief this Court deems just and proper.

Respectfully submitted,

/s/Alfonso Morales
Alfonso Morales, Esq.
Attorney for Jorge Serrato Herrera

Dated: November 26, 2025

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Jorge Serrato Herrera, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 26 day of November, 2025.

/s/Alfonso Morales
Alfonso Morales, Esq.
Attorney for Jorge Serrato Herrera

INDEX IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

JORGE SERRATO HERRERA

EXHIBIT	DESCRIPTION
A	COPY OF BIRTH CERTIFICATE WITH ENGLISH TRANSLATION FOR PETITIONER JORGE SERRATO HERRERA
B	COPY OF DECLARATION OF PETITIONER JORGE SERRATO HERRERA
C	COPY OF ORDER OF THE IMMIGRATION JUDGE DENYING REDETERMINATION OF CUSTODY
D	COPY OF GOOD MORAL CHARACTER DOCUMENTS FOR PETITIONER JORGE SERRATO HERRERA

EXHIBIT B

DECLARATION OF JORGE SERRATO HERRERA (PREPARED BASED ON TELEPHONIC CONVERSATION)

1. On the morning of my arrest, I left my home between approximately 6:30 and 7:30 a.m. I exited my house as usual and walked toward my car. As I reached my vehicle and was about to open the driver's door, the incident occurred.
2. A man suddenly approached me and asked if I was "Jorge Serrato." I did not answer yes or no and instead asked him what the situation was.
3. When I turned to face him, I saw that he was wearing an ICE vest. When I looked around, I realized there were at least six additional officers surrounding me, all wearing ICE vests.
4. The officer told me they were there "for a warrant," but he never showed me any warrant or any documentation at all.
5. I remained quiet, and the officers immediately handcuffed me. They took my backpack and the wallet that was inside. They then escorted me to an unmarked vehicle with no license plates.
6. One of the officers shoved me and forced me into the vehicle, which had completely blacked-out windows.
7. The officers drove me to a nearby park parking lot. There, they removed me from the vehicle, placed restraints on my wrists, waist, and legs, and transported me to the ICE facility in downtown Los Angeles. Later that same day, I was transferred to the Adelanto detention center.
8. During my time in detention, I became sick, and my health has declined.
9. I developed cuts on my teeth, and for about a week I repeatedly asked to see a dentist but received no timely care.

Executed on November 25, 2025

This declaration was prepared by declarant for Petitioner based on a telephonic conversation with Petitioner, who is currently detained and unable to sign in person. Petitioner has reviewed the contents orally and affirmed their truth to the best of his knowledge.

Respectfully submitted,

/s/ Tanya Reyes

Tanya Reyes, Declarant on behalf of JORGE SERRATO HERRERA, Petitioner

EXHIBIT C

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
ADELANTO IMMIGRATION COURT

Respondent Name:
SERRATO HERRERA, JORGE

To:
Morales, Alfonso
8131 ROSECRANS AVE
SUITE 200
PARAMOUNT, CA 90723

A-Number:
[redacted]

Riders:
In Custody Redetermination Proceedings

Date:
11/04/2025

ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

☑ Denied, because
No Jurisdiction - Applicant for Admission

The Board held that based on the language of section 235(b)(2) (A) of the Immigration and Nationality Act, Immigration Judges lack authority to hear bond requests or to grant bond to aliens like the respondent who are present in the United States without admission. Matter of Yajure Hurtado, 29 I&N Dec. 216, 220-29 (BIA 2025). Based on the respondent's presence in the United States without admission and the Board's intervening precedent in Yajure Hurtado, the Court lacks the authority to conduct the Bond hearing.

☐ Granted. It is ordered that Respondent be:
- ☐ released from custody on his own recognizance.
- ☐ released from custody under bond of $
- ☐ other:

☐ Other:

Immigration Judge: HALPERIN, RAVIT 11/04/2025

Appeal: Department of Homeland Security: ☐ waived ☐ reserved
Respondent: ☐ waived ☐ reserved

Appeal Due: 12/04/2025

Certificate of Service

This document was served:
Via: [M] Mail | [P] Personal Service | [E] Electronic Service | [U] Address Unavailable
To: [ ] Alien | [ ] Alien c/o custodial officer | [E] Alien atty/rep. | [E] DHS
Respondent Name : SERRATO HERRERA, JORGE | A-Number : [redacted]
Riders:
Date: 11/04/2025 By: CHAMBERS, KARINA, Court Staff

EXHIBIT D

PRIMERA IGLESIA BAUTISTA HISPANA

DE MONTEBELLO

August ,24,2012

To Whom it May Concern: USCIS OFFICER

This letter serves to verify the participation of Jorge Serrato in the primeraiglesiabautistahispana de Montebello Church of 904 oakwoodst, Montebello, CA 90640. Jorge Serrato was a member of our congregationfrom 2002 to 2010.

Jorge Serrato and his family were key in helping build our ministries throughout the years that they were involved. Their service led to outreach activities in the spiritual growth of our congregation's members. They are service oriented individuals who give of themselves to others in our community. Jorge serrato played an instrument in the musical group as well.

If you have any questions, please do not hesitate to contact me at [redacted]

Sincerely,

Pastor
PRIMERA IGLESIA BAUTISTA HISPANA DE MONTEBELLO

First Spanish
904
Montebello
A Church With A Vision