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Attorney for Petitioner

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

FRISCA INYI RAMIREZ CLAVIJO *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 Frisca Inyi Ramirez Clavijo ("Petitioner") to remedy her unlawful detention.
2. Petitioner is a 33-year-old citizen of Colombia and the mother of two children.
3. On September 23, 2025, Petitioner was taken into custody and is currently detained at the Adelanto Detention Facility. [*See* Exhibit A: "Declaration for Frisca Inyi Ramirez Clavijo"].

4. Petitioner is currently in removal proceedings and has a pending asylum application filed on June 30, 2023, with the Executive Office for Immigration Review (EOIR). She sought asylum relief before that court, on the basis of a well-founded fear of harm and persecution if returned to Colombia. [*See* Exhibit D: "Receipt for Petitioners Asylum Application"].
5. On November 18, 2025, she was denied release on bond by Order of an Immigration Judge, citing no jurisdiction under INA § 235(b) leaving her in continued custody without a constitutionally adequate opportunity to seek release. [*See* Exhibit B: "Order of the Immigration Judge Denying Redetermination of Custody"].
6. Accordingly, Petitioner respectfully requests that this Court order Respondents to provide her with a prompt and constitutionally adequate bond hearing before an Immigration Judge, or, in the alternative, to release her from custody if such a hearing is not provided within a reasonable period.

JURISDICTION

7. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq*.
8. 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).
9. 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

10. 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.

11. 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

12. 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).

13. 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

14. Petitioner was arrested by ICE officers on September 23, 2025, and was transferred to Adelanto Detention Center where she is currently detained. She is in custody, and under the direct control, of Respondents and their agents.

15. 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.

16. 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 her.

17. 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.

18. 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

19. Petitioner has exhausted all administrative remedies available to her. She is currently detained at the Adelanto Detention Facility under the custody of U.S. Immigration and Customs Enforcement ("ICE"). After her arrest, Petitioner sought release from custody through a bond request, which was denied by an Immigration Judge on November 26, 2025.

20. No further administrative process exists to challenge her ongoing detention or to obtain the relief sought. Petitioner does not challenge the discretionary denial of bond itself but rather the legality of her 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

21. Petitioner is a 33-year-old citizen of Colombia.

22. Petitioner has resided continuously and permanently in the United States since she entered on or around October 2022.

23. She is the mother of two young children. She has a 13-year-old son and an 11-year-old daughter.

24. Petitioner was taken into ICE custody on September 23, 2025. Ten days prior, Petitioner had appeared for a routine ICE check-in, as required. Five days after that appointment, ICE contacted Petitioner again and instructed her to report for an additional, unscheduled check-in at the San Jose office on the following Tuesday.

25. At that appointment, ICE officers informed Petitioner that she had allegedly failed to submit required photographs through a DHS mobile application.

26. This assertion was incorrect. Petitioner had submitted the photographs as instructed, had attended all scheduled ICE check-ins, and had appeared at every immigration court hearing.

27. However, ICE officers presented documents alleging to show violations, despite Petitioner's full compliance with monitoring and reporting requirements over several years.

28. Without further explanation, officers informed Petitioner that she would be taken into custody. She was handcuffed on her hands and feet

29. She was transported first to San Francisco and later transferred to the Adelanto ICE Processing Center where she has remained for over two months, with no end in sight. *Id.*

30. Petitioner is currently in removal proceedings and has a pending asylum application filed on June 30, 2023, with EOIR. She seeks asylum relief before that court, on the basis of a well-founded fear of harm and persecution if returned to Colombia. [*See* Exhibit D: "Receipt for Petitioners Asylum Application"].

31. On September 26, 2025, she was denied release from custody under bond by the Immigration Judge, reasoning "no jurisdiction. INA § 235(b)." [*See* Exhibit B: "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 her 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*. She 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 her release.

46. Petitioner has strong family and community ties in the United States. She is active in her children's schooling. [*See* Exhibit E: "Letters of Support for Petitioner Frisca Inyi Ramirez Clavijo"]. She is described by her children's teacher as "a mother with the wellbeing of her child at the forefront." *Id.* She is also described as a mother who communicates with her children's teachers, sets up meetings, arranges for translators all to ensure her children are successful. *Id.* Her daughter's teacher explains that her daughter moved up three grade levels in reading and accredited this achievement to Petitioners attention. *Id.* She is also a registered and active parishioner at [redacted] *Id.* She is also steadily employed. *Id.* Because Petitioner is detained under § 1226(a), the statute affords her 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 her of the procedural protections mandated by § 1226(a), rendering her continued detention fundamentally inconsistent with the Fifth Amendment. This concern is heightened because Respondent was previously denied a bond hearing based on an incorrect statute, 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. The government has offered no evidence that Petitioner poses a danger to the community or is likely to flee. To the contrary, Petitioner has deep family and community ties in the United States, including two young children and numerous letters of support attesting to her character, integrity, and devotion as a mother, employee, and parishioner. [*See* Exhibit D: "Letters of Support for Petitioner Lucio Gutierrez Garcia"].

52. Second, Petitioner does not pose a risk of flight. She has maintained a consistent residence and strong family and community support network. *Id.* Her young children and community advocates depend on her presence, giving her every incentive to appear for her immigration proceedings. *Id.* Petitioner has no history of failing to appear in court,

evading law enforcement, or absconding from supervision. Prior to her detention she regularly appeared to her scheduled and unscheduled ICE check-ins. She currently has a pending asylum application, further demonstrating her compliance with immigration procedures and her commitment to resolving her case lawfully through the judicial process. Prior to her detention, she worked regularly and was a caretaker for her children. *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 she 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

54. If she 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 and the 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 Frisca Inyi Ramirez Clavijo

Dated: November 26, 2025

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

I represent Petitioner, Frisca Inyi Ramirez Clavijo, and submit this verification on her 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 Frisca Inyi Ramirez Clavijo

INDEX IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

FRISCA INYI RAMIREZ CLAVIJO

EXHIBIT	DESCRIPTION
A	COPY OF DECLARATION OF PETITIONER FRISCA INYI RAMIREZ CLAVIJO
B	COPY OF ORDER OF THE IMMIGRATION JUDGE DENYING REDETERMINATION OF CUSTODY
C	COPY OF ASYLUM APPLICATION FILED FOR PETITIONER FRISCA INYI RAMIREZ CLAVIJO
D	COPY OF LETTERS OF SUPPORT FOR PETITIONER FRISCA INYI RAMIREZ CLAVIJO

EXHIBIT A

DECLARATION OF FRISCA INYI RAMIREZ CLAVIJO (PREPARED BASED ON TELEPHONIC CONVERSATION)

1. On September 23, 2025, I was taken into custody by ICE. Ten days earlier, I had gone to a routine ICE check-in. Five days after that appointment, ICE called me again and told me I needed to report for an additional check-in. They said I had to appear at the San Jose office by that Tuesday between 8:00 and 9:00 a.m.
2. At the appointment, the officers told me that I had failed to take a required photograph on time through a DHS application that was previously set up on my phone. This was not true; I had taken the photograph when they asked me to, attended all my scheduled ICE check-ins, and was present at every immigration court hearing. They pulled out papers that they claimed showed violations, even though I had complied with everything they required of me for years.
3. Then they told me that I was being detained. I felt sick and started to cry. They handcuffed my hands and feet, took me to San Francisco, and later transferred me to Adelanto.
4. I have an asylum application pending, and I am the mother of two children: a 13-year-old son and an 11-year-old daughter.

Executed on November 25, 2025

This declaration was prepared for Petitioner based on a telephonic conversation conducted in Spanish. The contents have been translated into English and accurately reflect Petitioner's statements. Because Petitioner is currently detained and unable to sign in person, Petitioner reviewed the declaration orally and affirmed its truth to the best of her knowledge.

Respectfully submitted,

/s/ Tanya Reyes

Tanya Reyes, Declarant on behalf of Frisca Inyi Ramirez Clavijo, Petitioner

EXHIBIT B

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

Respondent Name:
RAMIREZ CLAVIJO, FRISCA INYI

To:
Pope, Nathan Michael
1301 U St NW #321
Washington, DC 20009

A-Number:
[redacted]

Riders:
In Custody Redetermination Proceedings

Date:
11/18/2025

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. INA § 235(b).

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

☐ Other:

EXHIBIT C

RESPONDENT'S NOTICE OF FILING ASYLUM APPLICATION

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OFFICE OF THE IMMIGRATION JUDGE
SAN FRANCISCO, CALIFORNIA

In the Matter of:	
TURRIAGO GUTIERREZ, JOSE WILSON RAMIREZ CLAVIJO, FRISCA INYI [redacted]	**File No.: A#** [redacted] **File No.: A#** **File No.: A#** **File No.: A#**
In Removal Proceedings	

Immigration Judge: Dillon, Chloe S. **Next Master Hearing:** October 4, 2023, at 9:00 am

RESPONDENT'S NOTICE OF FILING ASYLUM APPLICATION

COMES NOW, Respondents, TURRIAGO GUTIERREZ, JOSE WILSON and respectfully form I-589, Application of Asylum and Withholding of Removal with the Immigration Court.

Respectfully submitted,

Date: 06-29-23

TURRIAGO GUTIERREZ, JOSE WILSON

Name: TURRIAGO GUTIERREZ, JOSE WILSON
File No.: A [redacted]

Respondent: TURRIAGO GUTIERREZ, JOSE WILSON **File No.: A** [redacted]

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EXHIBIT D

10/17/25

To Whom it may concern,

I am writing this letter on behalf of Frisca Inyi Ramirez Calvijo, a person currently in the custody of ICE in Santa Clara County, California. Ms. Ramirez is the parent of a student I had in my classroom last year and I got to know her as a dedicated mother with the best interests of her child at heart. I first met the family in the spring of 2022 when they moved to the district. Ms. Ramirez's older son was in my colleague's class that year, and he was a hard worker who, despite his limited English skills at the time, pitched right in to a grade-level project we were working on. Then, in the 2024-25 school year, I had Ms. Ramirez's youngest child in my class. Ms. Ramirez was apprehensive about our trip to Science Camp, which happened early in the school year, but she overcame her hesitation, attended the information meeting, and connected there with one of our district translators who was able to answer her questions. She then felt comfortable making sure her child had the opportunity to attend science camp. This is a mother with the well being of her child at the forefront. Ms. Ramirez attended our parent-teacher conference in September, and we had such a productive discussion about how to support her child that we set up another meeting the following week to continue our plan for supporting her daughter. Later in the year, the student had had some issues adjusting to school and wasn't making the progress her mom expected in reading and math. At every turn, Ms. Ramirez communicated with me, set up meetings, arranged for translators, and did all she could to help her daughter be successful. Ms. Ramirez insisted that all of the support teachers at school meet as a team to help ensure the student's success. Due to her mother's care, support, and communication with the school, the student made phenomenal progress in school last year, increasing 3 grade levels in reading and becoming much more comfortable sharing her math learning in class. Again, this growth was due to a mother who has the best interests of her child at heart. From my observations, Ms. Ramirez is a mother who wants her children to have every opportunity, and she is making that happen. Please consider the extremely detrimental effect it will have if this mother is separated from her children.

Yours,
Beth Stauter
Central Park Elementary



Elisabeth Gallegos
[redacted]

October 17, 20205

Re: Frisca Inyi Ramirez Calvijo (ICE Detainee)

I am writing on behalf of Frisca Inyi Ramirez Calvijo (parent of [redacted]). I don't usually take the time to write letters in support of people who are not family. However, in the case of Mrs. Ramirez I am writing because I have seen her character first hand in the life of her daughter. I was able to help with interpreting her daughter's educational school conference last year. During the meeting I saw a mother who was caring, motivating, and deeply involved in her daughter's success. In the education realm we see many families who seem too busy to care about anything else other than work. Mrs. Ramirez was different, she took the time to stay in contact with her teacher and implement the study plan that the teacher recommended. This isn't always an easy task with a language barrier. I saw an impressive mother daughter relationship where the child was able to voice her likes and dislikes without retribution.

What I see is a woman who is needed by her children and makes a huge difference in their lives. She is the driving force behind her children's success. Their lives will be forever changed for the worse if their mother is not a part of it. Please consider Frisca's character as a go-getter who pushes herself and children to be the best. It is very challenging to come to a new country not having the language but knowing in the long run your children will be better for it.

I respectfully request you consider releasing her even with an ankle monitor if necessary to allow her to be with her children who need her.

Respectfully,

Elisabeth Gallegos
Secretary
Central Park Elementary School
[redacted]

SAINT Clare PARISH COMMUNITY

725 Washington Street • Santa Clara, CA • 95050-4935
408.248.7786 • fax 408.248.8150

Santa Clara, CA

October 20, 2025

To whom it may concern,

My name is Francisco Daniel Rios, I am the Parochial Vicar at St. Clare's Roman Catholic Church in Santa Clara, CA. I know FRISCA INYI RAMIREZ CLAVIJO, who was born [redacted] in Acacias, Meta, Colombia and lives at [redacted] She is a registered parishioner in our church since December 2022. She attends St. Clare Parish regularly. The whole family is involved in our church; she is a lector and reads at our Sunday Masses. She is a very devoted and committed parishioner.

She deserves my highest recommendation. Should you have any question do not hesitate to call me at [redacted]

Sincerely yours,

Francisco D. Río

Msgr. Francisco D. Rios

Parochial Vicar

SAINT CLARE PARISH Santa Clara, CA 1777

Marilyn Palermo
[redacted]

To Whom It May Concern:
I have known Friscainyi Ramirez for nearly three years. I have met with the family many times. She has been a woman who lives a model life as wife and mother. Her hard work ethic has served her and the family well.

She sees to the education and upbringing of her children; She has followed the local and national laws and is an asset to our country. I attest to her character and await the day she willl become a United States citizen.

Sincerely,
Marilyn Palermo

Eurest

Date: 10.14.2025
Name: Ryann Stevenson
Title: Assistant General Manager
Company: Eurest @ Intuitive Surgical
Address: [redacted]

To Whom It May Concern:
I am writing regarding Frisca Clavijo, one of our team members here at Intuitive Surgical cafes.

Frisca has been with us for nearly a year and has quickly become an invaluable member of our team. She has taken the initiative to truly understand our operations and consistently goes above and beyond in supporting her teammates and delivering exceptional service to our guests. Her positive attitude is infectious and deeply appreciated by all. Frisca's reliability and willingness to step in—whether to assist with tasks or cover shifts—demonstrate her strong commitment to the team. We've been proud to witness her growth and are actively considering her for a well-deserved promotion

Frisca's absence over the past few weeks has been deeply felt by our entire team. While we fully respect and uphold the law, and encourage all employees to do the same, we also recognize that mistakes can happen. Frisca has shown genuine dedication to her role and to those around her, and we believe in her potential for growth and redemption. We sincerely hope you'll consider giving her the opportunity to return to her team and family—where she is truly valued and missed.

Sincerely,
Ryann Stevenson

October 14, 2025

To Whom It May Concern,

I am writing on behalf of Frisca Inyi Ramirez Calvijo, a mother who is currently being detained by ICE. Ms. Ramirez is a wonderful mom, and her children truly need her at home.

I had the privilege of having her daughter in my class two years ago. During that time, it was clear how deeply she cared about her daughter's education and well-being. She consistently communicated with me, always wanting what was best for her child. I sent books home every week with her daughter so she could support her daughter's reading skills.

I especially remember an overnight class trip we took, during which her mom stayed in contact to ensure her daughter was doing well and felt comfortable. Her love, involvement, and dedication as a parent were evident in every interaction.

It is my sincere hope that she can be reunited with her children soon. They need their mother's care, guidance, and support.

Sincerely,

Jennifer Zeitler

Fourth Grade Teacher

Central Park Elementary School

Santa Clara Unified School District

October 13, 2025

To whom it may concern:

My name is Karen Trayer. My husband and I have been renting a condominium to Frisca Ramirez and her family since November 2022. I can unequivocally state that they are a wonderful family who want nothing but to be upstanding members of the community and provide a better life for themselves and their children. They are respectful and reliable, devout Catholics, extremely hard workers, and an asset to the community.

In the three years they have been our tenants, Frisca and Jose have never once been late with their rent payment. They take excellent care of the property, even making improvements like painting and shampooing rugs without ever being asked. They are unfailingly polite and respectful, expressing gratitude for any small thing we do for them. In the 15 years we have rented out the property, they are without a doubt the best tenants we have ever had.

Faith is very important to the family. They pray together every night and teach their children strong moral values, by example and instruction. They are active members of their church, and both children are altar servers. The respect and kindness their children show for others reflects the values they learned at home.

Both Frisca and Jose have worked full time since they came to this country while at the same time providing a stable and loving environment for the children. They have instilled in their children a strong work ethic, and both children are doing well in school while also helping at home.

In every respect the family is an asset to the community. They are capable and reliable workers who are valued by their employers. The children are loved by their teachers and classmates alike because of their dedication to their studies and their willingness to help others. But the family is suffering now, both emotionally and financially, because of Frisca's detention. Returning her to her family would benefit the family and the community alike.

Thank you.

Respectfully yours,

James Trayer
Karen Trayer

James and Karen Trayer

MARYKNOLL SISTERS - MONROVIA
340 Norumbega Drive, Monrovia, CA 91016
Tel: (626) 358-1825

October 14, 2025

To Whom It May Concern:

My name is Sr. Arlene Trant. I am a Maryknoll Sister currently on Family Leave caring for my 100-year-old mother in Santa Clara, California.

While here in Santa Clara, I met a Colombian family who came to the States three years ago seeking asylum. Their mother, Frisca Ramirez, asked if I would tutor her two young children in English. Frisca was very concerned that her children learn English, so that they would excel in their studies, so I was very happy to tutor them. The children were always very respectful and eager to learn, so it is clear that they have been taught strong moral values.

I tutored the children in their apartment and was able to see firsthand what a caring and responsible mother Frisca is. Their home was always neat and tidy. She is an excellent cook and makes very nutritious meals for the family. From my encounters with Frisca I can see that she is a very dedicated and caring mother.

I have seen the children since Frisca was detained by ICE, and their mother's absence has clearly had a very negative impact on the children. They are not focusing well and are having a hard time keeping up with their studies. For the sake of the family, I sincerely hope that Frisca can be released from detention and returned to her family, as soon as possible.

Respectfully yours,

Sr Arlene Trant

Sister Arlene Trant
Maryknoll Sister