**Alfonso Morales, State Bar No. 235314**
LAW OFFICE OF ALFONSO MORALES, ESQ.
8131 Rosecrans Ave., Ste. 200
Paramount, CA 90723
Telephone: (310) 669-8700

Attorney for Petitioner

**UNITED STATES DISTRICT COURT**
**CENTRAL DISTRICT OF CALIFORNIA**

CINTHYA STEPHANIE ARIAS SALAZAR

*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 Cinthya Stephanie Arias Salazar ("Petitioner") to remedy her unlawful detention.
2. Petitioner is a 22-year-old citizen of El Salvador. [*See* Exhibit A: "Declaration for Petitioner Cinthya Stephanie Arias Salazar].
3. On October 03, 2025, Petitioner was taken into custody and is currently detained at the Adelanto Detention Facility. *Id.*

4. Petitioner currently has an appeal pending before the Board of Immigration Appeals. [*See* Exhibit C: "Filing Receipt for BIA Appeal"].

5. On November 11, 2025, she was denied release on bond due to "no jurisdiction," per INA section 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 October 03, 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 18, 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 22-year-old citizen of El Salvador. [*See* Exhibit A: "Declaration for Petitioner Cinthya Stephanie Arias Salazar].

22. Petitioner has resided continuously and permanently in the United States since approximately the year 2019. *Id.*

23. On October 03, 2025, Petitioner was taken into custody. *Id.*

24. Petitioner was arrested on October 3, 2025, while accompanying her mother to her mother's yearly scheduled ICE check-in at the Downtown Los Angeles ICE office. *Id.* She attended the appointment with her mother, sister, and brother. *Id.* Upon entering the building, all four family members were immediately informed by ICE officers that they were being detained and would be transferred to a detention facility. *Id.*

25. Petitioner's mother and her younger siblings were separated from her and later transported to the South Texas Family Residential Center in Dilley, Texas. *Id.* Her mother and siblings have since been released on their own recognizance. *Id.*

26. Petitioner, however, remains detained, even though she has no criminal history, has an active appeal pending before the BIA, has strong community ties, poses no flight risk, and has a documented record of educational achievement and community involvement.

27. On November 18, 2025, she was denied release from custody under bond by the Immigration Judge based on the Courts alleged lack of jurisdiction per INA section 235(b). [*See* Exhibit B: "Order of the Immigration Judge Denying Redetermination of Custody"].

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

## LEGAL FRAMEWORK

29. 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.

30. 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.

31. 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.

32. 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.

33. 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.*

## CLAIMS FOR RELIEF

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

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

35. 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.

36. 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).

37. 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).

38. 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).

39. 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.

40. 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.

41. 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.*

42. 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 INA section 235(b) 8 U.S.C § 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.

43. Petitioner has strong family and community ties in the United States. She has lived in the United States since 2019 and has built her life, education, and support network here. She is actively involved in her church and has consistently demonstrated responsibility and service to her community. Petitioner has no criminal history, and nothing in her record places her within the mandatory-detention provisions of § 1226(c). She is also not subject to post-final-order detention under § 1231(a) because her 2020 removal order remains on appeal and is therefore not final. As a noncitizen detained under § 1226(a), she is entitled to an individualized bond determination. Respondents' refusal to provide such a hearing contradicts the discretionary framework Congress established in § 1226(a) and exceeds the limited detention authority permitted by statute.

44. 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**

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

46. 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).

47. 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 "No jurisdiction, per INA section 235(b)" relying on the same misapplication of § 1225(b) that the district court rejected.

48. First, Petitioner does not pose a danger to the community. Petitioner has lived in the United States since 2019 and has developed strong ties to her family, church, and community. [*See* Exhibit D: "Letters of Support for Petitioner Cinthya Stephanie Arias Salazar]. She has a diploma from Robert Fulton College Preparatory School and has passed the Nurse Assistant (NAAP) skills evaluation. *Id.* She is a nursing student. *Id.* She is active in her church's summer camp program and has consistently demonstrated responsibility, stability, and positive engagement with her community. *Id.* Petitioner has no criminal history, and nothing in her record places her within the mandatory-detention provisions of § 1226(c). *Id.* Her background shows a sustained pattern of good moral character, service, and compliance with legal obligations.

49. Second, Petitioner does not pose a risk of flight. She has a stable residence, strong family ties, and a reliable support network in the United States. *Id.* She is represented by counsel in her immigration proceedings and has a pending appeal before the Board of Immigration Appeals, demonstrating her commitment to pursuing her case through lawful channels. *Id.* Prior to her detention, she was focused on her education and community involvement, further reflecting her stability and dedication to remaining engaged with the legal process. *Id.* These factors collectively establish that Petitioner can and will comply with any conditions of release set by the Court or an Immigration Judge.

50. 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**
**Request for Attorney's Fees Under the Equal Access to Justice Act**

51. 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 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 Petitioner from custody.

(7) In the alternative, grant a writ of habeas corpus ordering Respondents to immediately release Petitioner 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 Cinthya Stephanie Arias Salazar*

Dated: December 02, 2025

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

I represent Petitioner, Cinthya Stephanie Arias Salazar, 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 02 day of December, 2025.

/s/Alfonso Morales
Alfonso Morales, Esq.
*Attorney for Cinthya Stephanie Arias Salazar*

# INDEX IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

## CINTHYA STEPHANIE ARIAS SALAZAR

| EXHIBIT | DESCRIPTION |
|---|---|
| A | COPY OF DECLARATION OF PETITIONER CINTHYA STEPHANIE ARIAS SALAZAR |
| B | COPY OF ORDER OF THE IMMIGRATION JUDGE DENYING REDETERMINATION OF CUSTODY |
| C | COPY OF FILING RECIPET FOR APPEAL FROM BIA FILED FOR PETITIONER CINTHYA STEPHANIE ARIAS SALAZAR |
| D | COPY OF LETTERS OF SUPPORT AND GOOD MORAL CHARACTER DOCUMENTS FOR PETITIONER CINTHYA STEPHANIE ARIAS SALAZAR |

# EXHIBIT A

I Cinthya Stephannie Arias Salazar declare:

My Name is Cinthya Stephannie Arias Salazar I was born on [redacted].

I enter the Unite States on 2019 for the first time Cinse then I have never travel out side of the United States of America.

I have no criminal Record.
I ~~Am~~ a nurse student, I have my certificate in Nursing Assistan (CAN).

I was arested on Octeber 03, 2025 in my mother's Yearly Presentation at the ICE Bulding in down town Los Angeles CA, with my Mother, my sister and my brother. Before the arested day My mom already had an ankele bracelet (an ICE oficer put it to her) and we; My mom and I were in a checking program with ICE. The day we were arested Me and My family were separated.

I declare under the oath what was previus mentione is truth and corsect under the laws of the Unite States of America.

Date: November 05, 2025

[redacted]

# EXHIBIT B

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

Respondent Name:
ARIAS-SALAZAR, CYNTHIA STEPHANIE

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

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., per INA section 235(b).

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

☐ Other:

Immigration Judge: Maury, Carlos 11/18/2025

Appeal: Department of Homeland Security: ☑ waived ☐ reserved
Respondent: ☐ waived ☑ reserved
Appeal Due: 12/18/2025

**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 : ARIAS-SALAZAR, CYNTHIA STEPHANIE | A-Number : [redacted]
Riders:
Date: 11/18/2025 By: Anthony Madera, Court Staff

# EXHIBIT C

**U.S. Department of Justice**

Executive Office for Immigration Review

*Board of Immigration Appeals*
*Office of the Clerk*

*5107 Leesburg Pike, Suite 2000*
*Falls Church, Virginia 22041*

**Frost, Jeremy Robin**
**Jeremy**
**643 S. Olive St., #850**
**Los Angeles, CA 90014**

**DHS/ICE Office of Chief Counsel - NLA**
**606 S Olive St, 8th floor**
**Los Angeles, CA 90014**

**Name: SALAZAR-DE ARIAS, SANDRA ...** [redacted]

**Riders:** [redacted]

**Type of Proceeding: Removal**

**Date of this notice: 3/13/2020**

**Type of Appeal: Case Appeal**

**Filed by: Alien**

**FILING RECEIPT FOR APPEAL**

The Board of Immigration Appeals acknowledges receipt of your appeal and fee or fee waiver request (where applicable) on 3/10/2020 in the above-referenced case.

**WARNING:** If you leave the United States after filing this appeal but before the Board issues a decision your appeal will be considered withdrawn and the Immigration Judge's decision will become final as if no appeal had been taken (unless you are an "arriving alien" as defined in the regulations under 8 C.F.R. § 1001.1(q)).

**WARNING:** If you have been granted voluntary departure by the Immigration Judge, you must submit sufficient proof of having posted the voluntary departure bond set by the Immigration Judge to the Board of Immigration Appeals. Your submission of proof must be provided to the Board within 30 days of filing this appeal. If you do not timely submit proof to the Board that the voluntary departure bond has been posted, the Board cannot reinstate the period of voluntary departure. 8 C.F.R. § 1240.2(c)(3)(ii).

**PLEASE NOTE:**
In all future correspondence or filings with the Board, please list the name and alien registration number ("A" number) of the case (as indicated above), as well as all of the names and "A" numbers for every family member who is included in this appeal.

If you have any questions about how to file something at the Board, you should review the Board's Practice Manual at www.justice.gov/eoir.

Proof of service on the opposing party at the address above is required for ALL submissions to the Board of Immigration Appeals – including correspondence, forms, briefs, motions, and other documents. If you are the Respondent or Applicant, the "Opposing Party" is the District Counsel for the DHS or the Director of HHS/ORR at the address shown above. Your certificate of service must clearly identify the document sent to the opposing party, the opposing party's name and address, and the date it was sent to them. Any submission filed with the Board without a certificate of service on the opposing party will be rejected.

cc:

Sisler A

Userteam: West

# EXHIBIT F

Michelle Alexia Bacha
[redacted]

Date: October 15, 2025
Subject: Character Reference for Ms. Cinthya Stephany Arias Salazar

Dear Honorable Judge,

My name is Michelle Alexia Bacha, and I am writing this letter in support of Ms. Cinthya Arias, who is currently being detained by immigration authorities. I have been friends with Cinthya for about 5 years now and I have come to know her to be a dedicated, hard working, and kind woman that is always there for those around her.

She has consistently proven her dedication in helping others. I've witnessed it in her personal life as she is a main contributor in providing for her family. In addition to financial support, she is constantly caring for her two younger siblings, attentive and full of love. Apart from her close family circle she also extends another helping hand in every family and church event. Whether that's making food, serving food or even helping clean up, she's always there. I've also known it present by the way she speaks highly of her professional work. I know she has a true passion for assisting others in need and has always been motivated to do her best and learn to be better.

I have also had the pleasure to begin teaching her how to play the bass guitar. Learning an instrument is not a simple task and requires patience and dedication, both of which she demonstrated to me from the beginning. She always tries her best and wants to do right with others, always appreciative of the gift of time.

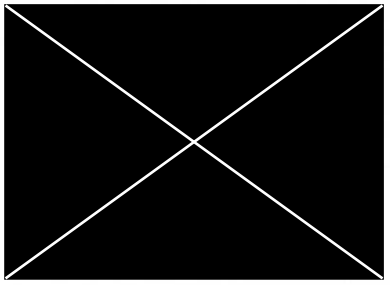
Cinthya is kind and tender. She never wants anyone to feel left out and tries to include everyone in group conversations. Additionally, she is always there for any mother who needs help, always lending a hand with children. I believe that speaks to her consideration of others and the way she values each person that comes her way.

I believe that her presence betters our community with her warmth and dedication. She is a provider, parent figure, contributor to our community, and a positive individual. I genuinely believe she deserves the opportunity to remain in the United States, to continue to be the reliable person she is in the lives of her family, community and myself.

Thank you for your time and I hope you take my account into consideration.

Sincerely,
Michelle Alexia Bacha

Elizabeth Oliva



Date: October 14, 2025

Honorable Immigration Judge

or

To Whom It May Concern

Subject: Character Reference for Ms. Cynthia Arias

Dear Honorable Judge,

My name is Elizabeth Oliva, and I am writing this letter in support of Ms. Cynthia Arias, who is currently being held in immigration detention. I have had the privilege of knowing Cynthia for four years as both a dear friend and a valued member of our community.

During the time I have known her, I have seen Cynthia embody kindness, responsibility, and unwavering dedication to her family and to those around her. She is always the first to offer help to others and never hesitates to give her time and energy to make our community stronger. I truly

believe that if she is allowed to remain in the United States, she will continue to make a positive and lasting impact on everyone she meets.

One of the best examples of Cynthia's character is her involvement in our church's summer camp. Every summer, we host a camp for children to learn about the Lord and to be guided on the right path. Cynthia is always there—ready to help, organize, and support without being asked. When I worked with her one summer, I saw how naturally she connected with the children. Her patience, compassion, and leadership left a deep impression on me and on everyone involved. She has a gift for inspiring others through her actions and her faith.

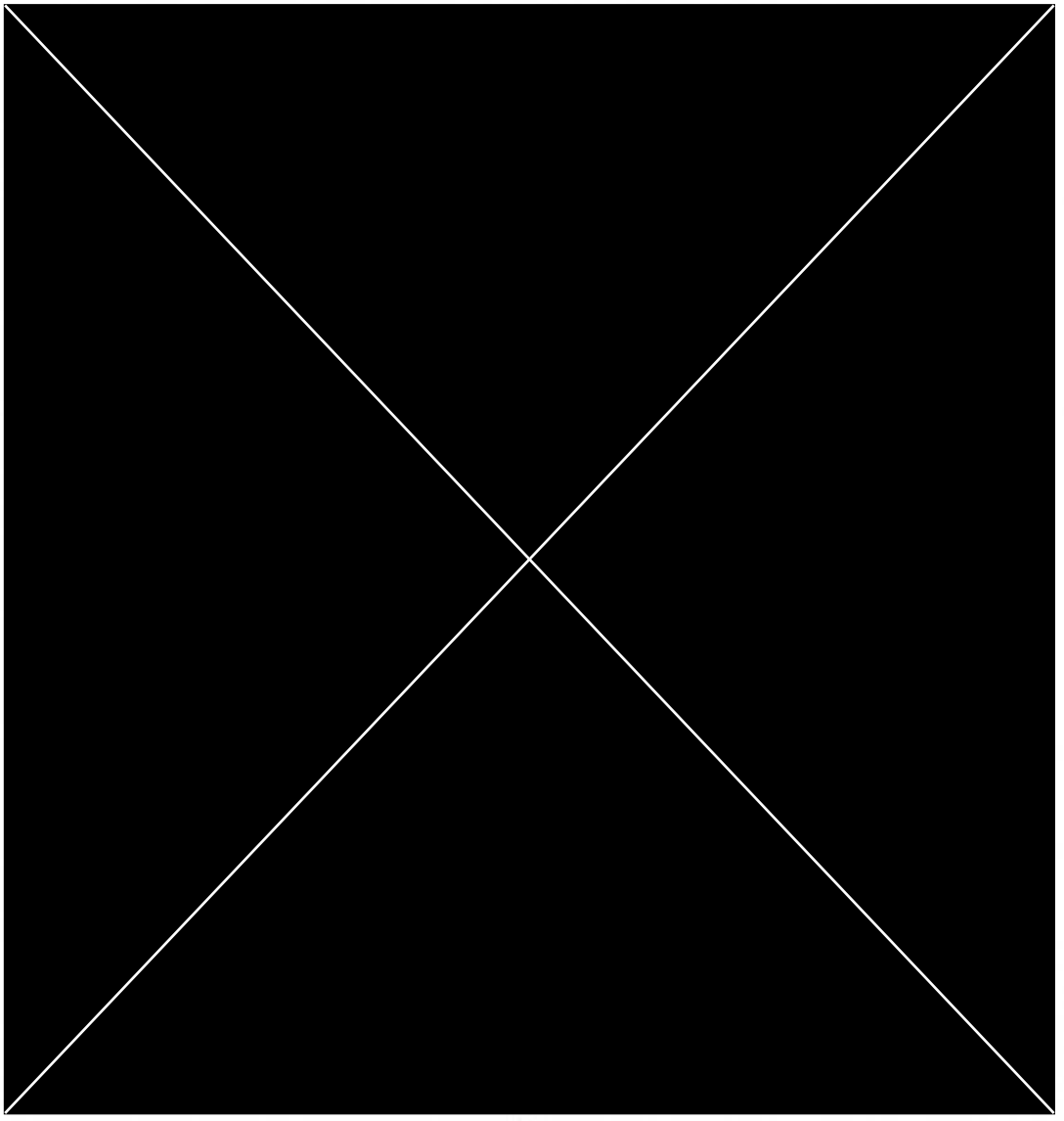
Cynthia is someone I deeply admire. She is selfless, dependable, and incredibly hardworking. Many people in our community rely on her, and since her absence, we have all felt her loss deeply. On a personal level, Cynthia is my closest friend—someone I love and respect deeply. Her presence brought joy and light into my life. I miss the laughter we shared and the conversations that always left me feeling hopeful and encouraged. She has taught me so much about resilience, humility, and faith, and I carry those lessons with me every day.

I kindly and respectfully ask that you take into consideration Cynthia's outstanding character, her strong family and community ties, and her positive influence on those around her when making a decision in her case. She is truly loved and supported by so many of us who are praying for her return home.

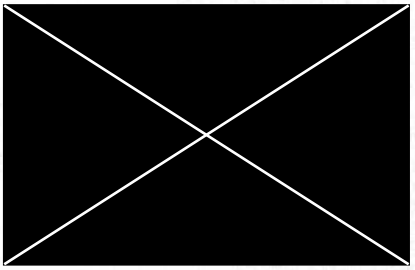
Thank you very much for your time, understanding, and compassion.

Sincerely,

Elizabeth Oliva



Melida Ralda



Date: October 14, 2025

Honorable Immigration Judge

or

To Whom It May Concern

Subject: Character Reference for Ms. Cynthia Arias

Dear Honorable Judge,

My name is Melida Ralda, and I am writing this letter in support of Ms. Cynthia Arias, who is currently being detained by immigration authorities. I have known Cynthia for approximately four years as a friend, coworker, and fellow member of our church community. Throughout this time, I have come to know her as a kind, hardworking, and responsible woman who deeply cares about her family and those around her.

Cynthia consistently demonstrates strong values of respect, compassion, and dedication. She has played an essential role in supporting her family, as her mother is a single parent raising two younger children. Despite her many responsibilities at home, Cynthia remains actively engaged in our community. She regularly attends and participates in church activities, where she serves as a teacher and a positive role model for others.

I have had the privilege of working closely with Cynthia both at work and at church. She is one of the teachers I collaborate with in our church programs, and I have witnessed her dedication, patience, and genuine desire to help others grow. Cynthia is a young woman with clear goals, strong values, and a deep commitment to making a difference. Even while managing significant responsibilities at home, she continues to prioritize learning, serving, and giving back to her community.

Cynthia's absence has been deeply felt by those who know and depend on her. She brings warmth, reliability, and positivity wherever she goes. Her compassion and work ethic are qualities that truly set her apart.

I respectfully ask that you consider her outstanding character, community involvement, and the hardship her detention has caused her family and loved ones. I sincerely believe that Ms. Arias deserves the opportunity to remain in the United States, where she can continue pursuing her goals and contributing positively to her family, her church, and our broader community.

Thank you for your time and for considering this request with fairness and compassion.

**Iglesia de Cristo Aposento Alto**
Ministerios Ebenezer
[redacted]

**October 15, 2025**

**To Whom It May Concern:**

My name is **Pastor Luis F. Lotan,** and I am a **U.S. citizen**. I have had the privilege of knowing **Ms. Cinthya Stephannie Arias Salazar** and her family since 2020. As Pastor of **Iglesia de Cristo Aposento Alto,** part of **Ministerios Ebenezer,** I have personally come to know Cinthya through her faithful and consistent involvement in our church community.

Throughout the years, I have witnessed Cinthya's remarkable growth both spiritually and personally. She, along with her sister Emily and brother Dennis, are young people of good moral character who demonstrate strong family values, humility, and respect for others. Cinthya, in particular, has distinguished herself as a dedicated and compassionate individual who serves as a positive example for her peers.

Cinthya volunteers regularly on our **worship team,** where she contributes her talents through **singing, playing an instrument, and participating in the dance ministry**. Her joyful attitude, reliability, and commitment to service make her an invaluable member of our congregation. Beyond her musical contributions, she often assists with church events and outreach activities, always willing to lend a hand where needed. Her willingness to serve and her kindhearted nature have earned her the admiration and respect of our entire church community.

In my many years of ministry, I have come to recognize individuals who genuinely strive to live out their faith and values—Cinthya is one of those rare individuals. She is **dependable, conscientious, honest, and peace-loving**. Her dedication to her family, her faith, and her desire to build a meaningful and productive life are evident in everything she does.

It is my sincere belief that Cinthya Stephannie Arias Salazar will

continue to be a valuable and positive presence in any community she becomes part of. Please feel free to contact me should you require any additional information.

Thank you for your time and consideration.

Sincerely,
**Pastor Luis F. Lotan**
Iglesia de Cristo Aposento Alto
Ministerios Ebenezer