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15 UNITED STATES DISTRICT COURT
16 FOR THE CENTRAL DISTRICT OF CALIFORNIA
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18 MELISA AGUILAR CENTES AND
19 MARIBEL CATALAN RAMIREZ
20 Plaintiffs and Petitioners,
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22 vs.
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25 JAMES JANECKA, Warden of the Adelanto
26 Detention Center; ERNESTO SANTACRUZ,
27 Jr., Acting Director of the Los Angeles Field
28 Office, United States Immigration and
Customs Enforcement; PAM BONDI,
Attorney General, United States Department
of Justice; KRISTI NOEM, Secretary, United
States Department of Homeland Security;
TODD LYONS, Acting Director of United
States Immigration and Customs
Enforcement; and DOES 1-5

Defendants-Respondents

Case No.:

Hon:

**PETITION FOR HABEAS
CORPUS AND COMPLAINT
FOR DECLARATORY AND
INJUNCTIVE RELIEF;**

INJUNCTIVE RELIEF; - 1

JURISDICTION AND VENUE

1. This action arises under the Constitution of the United States; the Immigration and Nationality Act, 8 U.S.C. § 1101 et seq., as amended by the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (“IIRIRA”), Pub. L. No. 104-208, 110 Stat. 1570 [hereinafter ‘INA’]; and Administrative Procedure Act, 5 U.S.C. §§ 701 et seq [hereinafter “APA”].

2. This Court has further jurisdiction under 28 U.S.C. § 2241, 2243, art. I § 9, cl. 2 of the United States Constitution (“Suspension Clause”), and 28 U.S.C. § 1331, as Petitioners are presently in custody under color of the authority of the United States based on the service of a Notice to Appear, and such custody is in violation of the Constitution, laws, or treaties of the United States.

3. This Court also may grant relief pursuant to 28 U.S.C. § 2241, 5 U.S.C. § 702, and the All Writs Act, 28 U.S.C. § 1651.

4. This court has further remedial authority pursuant to the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq..

5. The use of the Writ of Habeas Corpus to challenge detention by ICE is not foreclosed by the REAL ID Act. The REAL ID Act of 2005, Pub. L. 109-13, 119 Stat. 231 (May 11, 2005), Title I, Section 106(c), amending INA §§ 242(a)(2)(A), (B), (C) and § 242(g), only deprives the district court of habeas jurisdiction to review orders of removal, not challenges to detention or the denial of constitutional rights. *See INS v. St. Cyr*, 533 U.S. 289, 364-65 (2001) (“The writ of habeas corpus has always been available to review the legality of executive detention.”).

1 6. This Court could enjoin federal officials pursuant to *Ex Parte Young*, 209
2 U.S. 123 (1908). See *Philadelphia Co. v. Stimson*, 223 U.S. 605, 619–21 (1912)
3 (applying *Ex Parte Young* to federal official); *Goltra v. Weeks*, 271 U.S. 536, 545
4 (1926) (same).
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7 7. Plaintiffs-Petitioners have exhausted all administrative remedies to the
8 extent available and required by law.
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11 8. Venue properly lies within the Central District of California, because each
12 named Defendant-Respondent is present in this district and a substantial part of the
13 events or omissions giving rise to this action occurred and continue to occur in this
14 District. See 28 U.S.C. §1391(b). Petitioners are currently detained within this
15 district to wit, at the Adelanto Detention Facility located at 10400 Rancho Road,
16 Adelanto, CA 92301. Accordingly, the “restraint complained of” is occurring
17 within the Court’s territorial jurisdiction. See 28 U.S.C. § 2241(a)
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20 9. No petition for habeas corpus has previously been filed in any court to
21 review the legality of the named Plaintiffs-Petitioners’ respective detention.
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PARTIES

10. Plaintiff-Petitioner Melisa Aguilar Centes is a 23-year-old national and
citizen of El Salvador who had resided in the United States for over 12 years prior
to her detention by Respondents.

11. Plaintiff-Petitioner Maribel Catalan Ramirez is a 52-year-old national and
citizen of Guatemala who had resided in the United States for over 19 years prior
to her unlawful arrest and detention by Respondents.

PETITION FOR HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND
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1 12. The U.S. Department of Homeland Security (“DHS”) is a cabinet
2 department of the United States federal government with the primary mission of
3 securing the United States.
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7 13. ICE is an agency within DHS with the primary mission of arresting,
8 detaining, and removing non-citizens physically present within the territory of the
9 United States. ICE is also responsible for the custody and care of all detained non-
10 citizens awaiting resolution of their immigration cases or removal after a final
11 order of removal had been entered.
12
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17 14. Defendant Kristi Noem is the Secretary for DHS. In this capacity, Ms. Noem
18 has responsibility for the administration of immigration laws pursuant to 8 U.S.C.
19 §1103(a), has authority over ICE and its field offices, and has authority to order the
20 release of Plaintiffs-Petitioners. At all times relevant to this Complaint,
21 Defendant Noem was acting within the scope and course of her position as the
22 Secretary for DHS. Defendant Noem is sued in her official capacity.
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15. Defendant-Respondent Todd Lyons is the Acting Director and Senior
Official Performing the Duties of the Director of ICE. Defendant Lyons is
responsible for the implementation of all ICE’s policies, practices, and procedures,
including those relating to detention of non-citizens. Defendant Lyons is a legal
and immediate custodian of Petitioners. At all times relevant to this Complaint,
Defendant Lyons was acting within the scope and course of his position as an ICE
official. He is sued in his official capacity.

1 16. Defendant-Respondent Ernesto Santacruz, Jr. is the Acting Director of the
2
3 Los Angeles Field Office of ICE, which has immediate custody of Plaintiffs-
4
5 Petitioners. He is sued in his official capacity.
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7 17. Defendant James Janecka is the warden of the Adelanto Detention Facility in
8
9 San Bernardino County, where Plaintiffs-Petitioners are currently detained.
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11 Defendant Janecka is the immediate, physical custodian of Petitioners. He is
12
13 named in his official capacity.
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15 18. The true names or capacities, whether individual, corporate, associate or
16
17 otherwise, of the Defendants-Respondents named herein as Does 1 through 5 are
18
19 unknown to Plaintiffs-Petitioners, who therefore sues said Respondents by such
20
21 fictitious names, and Petitioners will amend this Complaint to show their true
22
23 names and capacities when ascertained. Does 1 through 5 are the immediate,
24
25 physical custodians of Plaintiffs-Petitioners
26

27 **FACTS RELEVANT TO ALL CAUSES OF ACTIONS**
28

19. Petitioner Maribel Catalan Ramirez is a fifty-two-year-old woman who was
born in, and is a citizen of, Guatemala. She has no criminal arrests or convictions. See
Exhibit A.

20. Petitioner entered the United States without inspection in 2006, 19 years ago,
and has resided in the country continuously ever since. Id.

21. On 12 November 2025 Petitioner, who is a street vendor, was selling her goods
and interacting with her customers when several masked individuals swarmed the
sidewalk and started to grab vendors indiscriminately. Id. The individuals did not
identified themselves in any way, did not present a warrant ,or ask any questions of
PETITION FOR HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF; - 5

1 Petitioner to ascertain probable cause as to her immigration status or flight risk.

2
3 Petitioner believes and hereby alleges that the arresting individuals were Border Patrol
4
5 officers engaged in a raid sanctioned by Respondents and had no reason to believe that
6
7 Petitioner was unlawfully present in the United States other than her occupation and
8
9 Latino appearance.

10
11 22. Respondents arrested Petitioner and three other Hispanic individuals. Id.

12
13 23. At the time of her arrest Petitioner was not armed, attempting to flee, resisting
14
15 arrest, or engaged in any other actions to endanger the officers. Yet, she accosted
16
17 aggressively by the officer and was “slammed [] on the ground” Id. ¶8.

18
19 24. The officers handcuffed Petitioner and took her to their car without conducting
20
21 any pre-deprivation interview or questioning.

22
23 25. Petitioner has no prior immigration record.

24
25 26. Upon her arrest Respondents transferred Petitioner to the B-18 temporary
26
27 detention site on 300 North Los Angeles Street for processing. Id. She was held in
28
B-18 for over 48 hours before being transferred to the Adelanto Detention Facility
where she remains detained.

27. Ms. Ramirez suffers from co-morbidities Her conditions have aggravated
significantly while in detention due to insufficient medical care and poor diet
resulting in her being rushed to the hospital for an emergency. Id. ¶10.

28. Petitioner was not allowed to apply for or post a bond and remain in
custody.

1 29. The Respondents have refused to release Petitioner from custody on
2
3 either conditional or humanitarian parole and have denied his request for
4
5 reasonable accommodation under the Rehabilitation Act.
6

7
8 30. On 25 November 2025 Respondents issued a Notice To Appear (NTA)
9
10 and placed Petitioner in section 240 proceedings as a person present in the
11
12 United States without having been admitted or paroled but claim that they have
13
14 no authority to release her under either section 212(d)(5) or section 236(a).
15
16

17 31. No expedited order of removal was ever entered and served on Petitioner.
18

19 32. Petitioner's section 240 removal proceedings are ongoing before the
20
21 EOIR, Adelanto, CA. Exhibit A at p. 2.
22

23
24 33. Petitioner Melisa Aguilar Centes is a twenty-three-year-old woman who was
25
26 born in, and is a citizen of, El Salvador. She entered without inspection 12 years ago
27
28 when she was only 11 years old. See Exhibit B.

34. On 17 September 2025 while at her boyfriend's home Petitioner received a
phone call from law enforcement requesting that she return to her house. Exhibit B at
1, ¶7. Petitioner complied with the request.

35. When she arrived at her house, she met with around 10 armed officers who
took her into custody without any issue. She was booked and arraigned based on a
criminal complaint alleging violation of 18 U.S.C. § 1029(a)(5) (Access Device Fraud
\$1,000+ in loss). See Exhibit C. On 17 September 2025 Petitioner was granted a
\$10,000 bond by an United States magistrate. See Exhibit D.

1 36. Petitioner posted bond but was taken into ICE custody based on a detainer
2
3 lodged by ICE before release. Respondents issued a Notice to Appear charging
4
5 respondents as a non-citizen present in the United States without admission or parole.
6
7 See Exhibit A at page 12.
8

9 37. An indictment was filed against Petitioner and she plead non-guilty on all
10
11 charges. Her criminal trial is scheduled for June 2026.
12

13 38. Petitioner has no prior immigration record.
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15 39. Upon her arrest Respondents transferred Petitioner the Adelanto Detention
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17 Facility where she remains detained.
18

19 40. Petitioner was not allowed to apply for or post an immigration bond and
20
21 remain in custody.
22

23 41. The Respondents have refused to release Petitioner from custody
24
25 asserting that she is subject to mandatory detention under section 1225(b).
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42. No expedited order of removal was ever entered and served on Petitioner.

43. Petitioner's section 240 removal proceedings are ongoing before the
EOIR, Adelanto, CA. Exhibit B at p. 2.

RELEVANT IMMIGRATION STATUTORY SCHEME

Section 1225(b)(1) Expedited Removal Proceedings

44. The expedited removal process, created by the Illegal Immigration Reform
and Immigrant Responsibility Act of 1996, is codified in INA § 235(b)(1), 8
U.S.C. §1225(b)(1). The INA permits the DHS to summarily remove non-citizens
PETITION FOR HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND
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1 arriving at a designated U.S. port of entry ('arriving aliens') "without further
2 hearing or review" if they are inadmissible either because they (1) lack valid entry
3 documents, or (2) tried to procure their admission into the United States through
4 fraud or misrepresentation. INA § 235(b)(1) also authorizes—but does not
5 require—DHS to extend application of expedited removal to "certain other aliens"
6 inadmissible on the same grounds if they (1) were not admitted or paroled into the
7 United States by immigration authorities and (2) cannot establish at least two years'
8 continuous physical presence in the United States at the time of apprehension.
9

10
11 45. Respondents have implemented expedited removal mainly for three
12 overarching categories of aliens who lack valid entry documents or attempted to
13 falsely procure admission: (1) arriving aliens (defined by regulation as aliens
14 arriving at U.S. ports of entry); (2) aliens who entered the United States by sea
15 without being admitted or paroled into the United States, and who have been in the
16 country less than two years; and (3) aliens apprehended within 100 miles of the
17 U.S. border within two years of entering the country, and who have not been
18 admitted or paroled.
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46. Respondents could not and have not invoked the expedited removal process
when they first apprehended Petitioner. See Exhibit A & B.

Regular or 'Section 240' Removal Proceedings

47. The second option for Respondents under the INA is to initiate what is
commonly referred to as "section 240" proceedings, the standard mechanism for
removing inadmissible and removable noncitizens. Section 240 removal
proceedings take place before an immigration judge (IJ), an employee of the
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1 Department of Justice who must be a licensed attorney and has a duty to develop
2 the record in cases before them. 8 U.S.C. § 1229a(a)(1), (b)(1); 8 C.F.R. §
3 1003.10(a). These are adversarial proceedings in which the noncitizen has the right
4 to hire counsel, file for all relief from removal within the jurisdiction of the
5 immigration judge, examine and present evidence, and cross-examine witnesses. 8
6 U.S.C. § 1229a(b)(4). Section 240 proceedings typically take place over the course
7 of multiple hearings., thus allowing time for individuals to gather and present
8 evidence in support of petitions for relief available in immigration court (like
9 asylum, adjustment of status, cancellation of removal, etc.) and to seek collateral
10 relief from other components of the Department of Homeland Security (like
11 U and T visa). See 8 U.S.C. §§ 1229a(b)(4)(B), (c)(4), 1229b.

12 **48.** After an IJ renders a decision, either party may appeal to the Board of
13 Immigration Appeals. 8 C.F.R. §§ 1240.15, 1003.1. If the Board upholds a removal
14 order, the noncitizen can appeal that decision to a federal court of appeals via a
15 petition for review. 8 U.S.C. § 1252.

Immigration Detention

16 **49.** The INA governs the use of immigration detention both pre- and post-final
17 order. Post-final-order immigration detention is governed by 8 U.S.C. § 1231(a);
18 pre-final-order detention by 8 U.S.C. § 1226.

19 **50.** In 8 U.S.C. §§ 1226 and 1231 Congress created different, but interrelated,
20 comprehensive frameworks for detaining criminal and non-criminal non-citizens.

21 **51.** Section 1226 authorizes the detention of non-citizens during removal
22 proceedings: section 1226(a) controls non-criminal aliens' detentions, while
23 PETITION FOR HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND
24 INJUNCTIVE RELIEF; - 10

1 section 1226(c) controls criminal aliens' detentions. *See* 8 U.S.C. § 1226(a)&(c).

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3 Once a non-citizen's removal proceedings are completed ICE's detention authority
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5 is controlled by section 1231, which also distinguishes between non-criminal and
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7 criminal non-citizens. *See* 8 U.S.C. § 1231.

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10 *Section 1226(a) and Non-Criminal Non-citizens*
11 *During Removal Proceedings*

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13 52. The Attorney General has discretion to detain a non-criminal non-citizen
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15 "pending a decision on whether the alien is to be removed from the United States."

16
17 *See* 8 U.S.C. § 1226(a). The Attorney General may detain the non-citizen for the
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19 duration of the removal proceedings or release him on bond or conditional parole.

20
21 *See* 8 U.S.C. § 1226(a)(1)-(2).

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23 53. In connection with § 1226(a), the DHS promulgated regulations setting out
24
25 the process by which a non-criminal non-citizen may obtain release. The
26
27 regulations provide that, in order to obtain bond or conditional parole, the "alien
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must demonstrate to the satisfaction of the officer that such release would not pose
a danger to property or persons, and that the alien is likely to appear for any future
proceeding." *See* 8 C.F.R. § 1236.1(c)(8).

Section 1226(c) and Criminal Non-citizens
During Removal Proceedings

54. Although the Attorney General has broad discretion to release non-criminal
non-citizens during the pendency of their removal proceedings, the INA limits the
Attorney General's discretion in the case of criminal non-citizens. Specifically,
section 1226(c) mandates that "[t]he Attorney General shall take into custody any

1 alien who . . . is deportable by reason of having committed [certain specified
2 offenses].” See 8 U.S.C. § 1226(c)(1)(B).

3
4
5 55. Section 1226(c) provides that the Attorney General may release a criminal
6 non-citizen “only if” necessary for narrow witness protection purposes. See 8
7 U.S.C. § 1226(c)(2). Under § 1226(c), custody is mandatory for criminal non-
8 citizens throughout the entirety of their removal proceedings, and there is no
9 statutory possibility for release on bond.
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14 56. Neither Petitioner was detained under the authority of section 1226(c).

15 57. When a non-citizen is released on bond or under supervision, the non-citizen
16 must periodically appear before an immigration officer, obey written restrictions,
17 and comply with other requirements provided for by regulation. See 8 U.S.C. §
18 1231(a)(3).
19
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23 58. When a non-citizen is released on supervision ICE must issue and serve on
24 the individual a standardized form I-220 which imposes the conditions on release.
25 Petitioner has no criminal record, prior immigration record and has complied with
26 all conditions on release.
27
28

Detention Pursuant to 8 U.S.C. § 1225(b)(2)

59. Under § 1225(b)(2), “in the case of an alien who is an applicant for
admission, if the examining immigration officer determines that an alien seeking
admission is not clearly and beyond a doubt entitled to be admitted, the alien shall
be detained.” 8 U.S.C. § 1225(b)(2). By contrast, an alien arrested on a warrant
issued by the Attorney General “may” be detained but is also eligible for release on
bond. 8 U.S.C. § 1226(a). Courts have repeatedly held that § 1225 applies to
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1 arriving aliens, while § 1226 governs detention of “aliens already in the country.”
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3 *Jennings v. Rodriguez*, 583 U.S. 281, 281 (2018). Neither Petitioner is an arriving
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5 alien under § 1225 and in fact Respondents charged both Petitioners as an “alien
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7 present in the United States who has not been admitted or paroled” rather than an
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9 “arriving alien.” See Exhibit A& B [Notice to Appear] (stating Petitioner is
10
11 charged under INA 212(a)(6)(a), codified at 8 U.S.C. § 1226(a)(6)(a)).
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13 60. The Courts to have addressed the issue have found the Government
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15 invocation of the mandatory detention provision under section 1225 unlawful and
16
17 have ordered release of non-citizens held in detention based of such erroneous
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19 reading of the Immigration and Nationality Act and application of § 1225(b) to
20
21 noncitizens who, like Petitioner, are not apprehended upon arrival in the United
22
23 States. *See Maldonado Bautista v. Santacruz Jr.*, No. 5:25-cv-01873-SSS-BFM,
24
25 Dkt 81 (C.D. Cal. Nov 20, 2025); *Rodriguez Vasquez v. Bostock*, No. 3:25-CV-
26
27 05240-TMC,---F.Supp.3d---, 2025 WL 1193850 (W.D.Wash. Apr. 24, 2025); *see*
28
also Gomes v. Hyde, No. 1:25-CV- 11571-JEK, 2025 WL 1869299, at *8 (D.
Mass. July 7, 2025) granting habeas based on same ground); *Diaz Alartinez v.*
Hyde, No. CV 25-11613-BEM,---F.Supp. 3d---2025 WL 2084238, at *9 (D. Mass.
July 24, 2025) (ordering release where noncitizen was redetained based on ICE's
assertion of detention authority under§ 1225(b)); *Helal v. Janecka*, No. 5:25-CV-
02650-HDV-JC, 2025 WL 3190132, at *3 (C.D. Cal. Oct. 24, 2025) (same).

61. Under *Loper Bright v. Raimondo*, this Court should independently interpret
the statute and give the BIA’s expansive interpretation of § 1225(b)(2) no weight,
as it conflicts with the statute, regulations, and precedent. 603 U.S. 369 (2024).

1 62. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of
2 the Illegal Immigration Reform and Immigrant Responsibility Act (“IIRIRA”) of
3 1996, Pub. L. No. 104-208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009-582 to
4 3009-583, 3009-585. Following IIRIRA, the Executive Office for Immigration
5 Review (“EOIR”) issued regulations clarifying that individuals who entered the
6 country without inspection were not considered detained under § 1225, but rather
7 under § 1226(a). *See Inspection and Expedited Removal of Aliens; Detention and*
8 *Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures*, 62 Fed.
9 Reg. 10312, 10323 (Mar. 6, 1997) (“Despite being applicants for admission, aliens
10 who are present without having been admitted or paroled (formerly referred to as
11 aliens who entered without inspection) will be eligible for bond and bond
12 redetermination”).

13 63. The statutory context and structure also make clear that § 1226 applies to
14 individuals who have not been admitted and entered without inspection. In 2025,
15 Congress added new mandatory detention grounds to § 1226(c) that apply only to
16 noncitizens who have not been admitted. *See The Laken Riley Act*, Pub. L. No. 119-1,
17 § 2, 139 Stat. 3, 3 (2025) (8 U.S.C. § 1226(c)(1)(E)).

18 64. By specifically referencing inadmissibility for entry without inspection under 8
19 U.S.C. § 1182(6)(A), Congress made clear that such individuals are otherwise covered
20 by § 1226(a). Thus, § 1226 plainly applies to noncitizens charged as inadmissible,
21 including those present without admission or parole.

22 65. The Supreme Court has explained that § 1225(b) is concerned “primarily [with
23 those] seeking entry,” and is generally imposed “at the Nation’s borders and ports of
24 PETITION FOR HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND
25 INJUNCTIVE RELIEF; - 14

1 entry, where the Government must determine whether [a noncitizen] seeking to enter
2 the country is admissible.” *Jennings v. Rodriguez*, 583 U.S. 281, 297, 2987 (2018). In
3 contrast, Section 1226 “authorizes the Government to detain certain aliens *already in*
4 *the country* pending the outcome of removal proceedings.” *Id.* at 289 (emphases
5 added).
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11 66. Furthermore, § 1225(b)(2) specifically applies only to those “seeking
12 admission,” and the implementing regulations at 8 C.F.R. § 1.2 address noncitizens
13 who are “coming or attempting to come into the United States.” The use of the present
14 progressive tense would exclude noncitizens like Petitioner who are apprehended in
15 the interior years after they entered, as they are no longer “seeking admission” or
16 “coming [...] into the United States.” *See Martinez v. Hyde*, 2025 WL 2084238 at *6
17 (D. Mass. July 24, 2025) (citing the use of present and present progressive tense to
18 support conclusion that INA § 1225(b)(2) does not apply to individuals apprehended
19 in the interior); *see also Al Otro Lado v. McAleenan*, 394 F. Supp. 3d 1168, 1200
20 (S.D. Cal. 2019) (construing “is arriving” in INA § 235(b)(1)(A)(i) and observing that
21 “[t]he use of the present progressive, like use of the present participle, denotes an
22 ongoing process”).
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67. Accordingly, the mandatory detention provision of § 1225(b)(2) does not apply to Petitioners, who each had entered the U.S. approximately yeas ago.

COUNT ONE

Detention in Violation of the Fifth Amendment (substantive due process) Against all Defendants

1 68. Petitioners repeat and incorporate by reference all allegations in paragraphs
2 19 to 67 above.

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4
5 69. The Fifth Amendment guarantees that no person shall be deprived of liberty
6 without due process of law. U.S. Const. Amend. V. “Freedom from
7 imprisonment—from government custody, detention, or other forms of physical
8 restraint—lies at the heart of the liberty that Clause protects.” *Zadvydas v. Davis*,
9 533 U.S. 678, 690 (2001).

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15 70. “Government detention violates the Due Process Clause unless it is ordered
16 in a criminal proceeding with adequate procedural safeguards, or in certain special
17 and non-punitive circumstances ‘where a special justification, . . . outweighs the
18 individual’s constitutionally protected interest in avoiding physical restraint.’”
19 *Zavala v. Ridge*, 310 F. Supp. 2d 1071, 1076 (N.D. Cal. 2004) (quoting *Kansas v.*
20 *Hendricks*, 521 U.S. 346, 356 (1997)).

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27 71. Respondents cannot show any “special justification” or compelling
28 governmental interest which would outweigh Petitioners’ constitutional liberty.

72. Neither Petitioner is a danger to anyone or flight risk.

73. The governmental interest in the continued detention of these least-dangerous individuals does not and cannot outweigh the liberty interest at stake.

COUNT TWO
Violation of Fifth Amendment Right
Procedural Due Process
Against All Defendants

74. Petitioners repeat and incorporate by reference all allegations in paragraphs
19 to 67 above.

1 75. The Fifth Amendment's Due Process Clause prohibits the federal government
2 from depriving any person of "life, liberty, or property, without due process of law."
3
4
5 U.S. Const. Amend. V.

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7 76. The Supreme Court has repeatedly emphasized that the Constitution generally
8 requires a hearing before the government deprives a person of liberty or property.
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11 Zinerman v. Burch, 494 U.S. 113, 127 (1990).

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13 77. Under the *Mathews v. Eldridge* framework, the balance of interests strongly
14 favors Petitioner's release.

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17 78. Petitioners' private interest in freedom from detention is profound. The interest
18 in being free from physical detention is "the most elemental of liberty interests." *Hamdi*
19 *v. Rumsfeld*, 542 U.S. 507, 529 (2004); *see also Zadvydas v. Davis*, 533 U.S. 678, 690
20 (2001) ("Freedom from imprisonment—from government custody, detention, or other
21 forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause
22 protects.").

23
24
25 79. The risk of erroneous deprivation is exceptionally high. Petitioner Ramirez has
26 never been arrested and has deep ties to the community. Petitioner Aguilar Centes was
27 arrested for violation of section 1029(a) but was found eligible for bond of \$10,000 by a
28 magistrate of this Court and is subject to restrictions that assure her appearance for all
future proceedings.

80. The government's interest in detaining Petitioners without due process is
minimal. Immigration detention is civil, not punitive, and may only be used to prevent
danger to the community or ensure appearance at immigration proceedings. *See*
Zadvydas, 533 U.S. at 690.

1 81. Furthermore, the “fiscal and administrative burdens” of providing Petitioner
2 with a bond hearing are minimal, particularly when weighed against the significant
3 liberty interests at stake. *See Mathews*, 424 U.S. at 334–35.
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7 82. Considering these factors, Petitioner respectfully requests that this Court order
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1 88. In 1997, after Congress amended the INA through IIRIRA, EOIR and the
2 then-Immigration and Naturalization Service ("INS") issued an interim rule to
3 interpret and apply IIRIRA. Specifically, under the heading of "Apprehension,
4 Custody, and Detention of [Noncitizens]," the agencies explained that "[d]espite
5 being applicants for admission, [noncitizens] who are present without having been
6 admitted or paroled (formerly referred to as [noncitizens] who entered without
7 inspection) will be eligible for bond and bond redetermination." 62 Fed. Reg. at
8 10323. The agencies thus made clear that individuals who had entered without
9 inspection were eligible for consideration for bond and bond hearings before IJs
10 under 8 U.S.C. § 1226 and its implementing regulations.

11 89. The application of § 1225(b)(2) to Petitioners unlawfully mandates their
12 continued detention and violates 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

COUNT FIVE

Non-Statutory Ultra Vires Action/Accardi Doctrine Violation Against all Defendants

13 90. Petitioners repeat and incorporate by reference all allegations in paragraphs
14 19 to 67 above.

15 91. There is no statute, constitutional provision, or other source of law that
16 authorizes Respondents to detain Petitioners under the circumstances of this case.

17 92. Petitioners have a non-statutory right of action to declare unlawful, set aside,
18 and enjoin Respondents' ultra vires actions in holding them in punitive
19 immigration detention without an opportunity to be heard and apply for a bond.

1 93. Under the *Accardi* doctrine, Petitioners also have a right to set aside agency
2 action that violated agency procedures, rules, or instructions. *See United States ex*
3 *rel. Accardi v. Shaughnessy*, 347 U.S. 260 (“If petitioner can prove the allegation
4 [that agency failed to follow its rules in a hearing] he should receive a new
5 hearing”).
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11 94. Respondents violated agency regulations governing who and upon what
12 findings it may holding individual without an opportunity for release.
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15 ***

16
17 **SUBSTANTIAL LIKELIHOOD OF SUCCESS**
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19 95. Petitioner repeats and incorporates by reference all allegations in paragraphs
20 1 to 94 above.
21

22
23 96. As shown above Petitioners has shown substantial likelihood of success on
24 her statutory and constitutional claims.
25

26
27 **NOTICE AND IRREPARABLE HARM**
28

97. Pursuant to Federal Rule of Civil Procedure 65(b)(1) and Local Rules 7-19
and 65-1, immediately after filing this Petition, Petitioners’ Counsel will provide a
copy of the Petition and notice of intent to move ex parte for an application for
relief under Rule 65(a).

98. Petitioners have resided in the United States for extended periods of time
and have established deep roots in the communities. Because of their respective
unlawful detention Petitioners has been separated from family members. Each is
experiencing severe emotional distress. See Exhibit A & B.

1 99. “It is well established that the deprivation of constitutional rights
2 unquestionably constitutes irreparable injury.” *Melendres v. Arpaio*, 695 F.3d 990,
3 1002 (9th Cir. 2012). “When an alleged deprivation of a constitutional right is
4 involved, most courts hold that no further showing of irreparable injury is
5 necessary.” *Warsoldier v. Woodford*, 418 F.3d 989, 1001–02 (9th Cir. 2005)
6 (cleaned up). Permitting continued violations of federal law would serve “neither
7 equity nor the public interest.” *Galvez v. Jaddou*, 52 F.4th 821, 832 (9th Cir. 2022).
8 Thus, the public interest weighs in favor of the Petitioners because continued
9 detention without the legal protections afforded by the INA, Due Process, and the
10 prohibition against non-refoulement potentially violates his due process and
11 statutory rights. *See Xuyue Zhang v. Barr*, 612 F.Supp.3d 1005, 1017 (C.D. Cal.
12 2019) (“Generally, public interest concerns are implicated when a constitutional
13 right has been violated, because all citizens have a stake in upholding the
14 Constitution.”).

PRAYER FOR RELIEF

WHEREFORE, Petitioners pray that this Court grant the following relief:

- (1) Issue a Temporary Restraining Order ordering release of Petitioners pending resolution of this case or in the alternative that Respondents provide them with a constitutionally valid bond hearing before an Immigration Judge;
- (2) Issue a Writ of Habeas Corpus on the ground that Petitioners’ continued detention violates the Due Process Clause and order Petitioners’ immediate release on reasonable conditions of supervision;

PETITION FOR HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF; - 21

- 1 (3) In the alternative, issue injunctive relief ordering Respondents to
2 immediately release Petitioners, on the ground that their respective continued
3 detention violates Plaintiff's constitutional due process rights;
4
5 (4) Issue an injunction ordering Respondents not to arrest and detain Petitioners
6 without a proper finding that each has committed a violation of the
7 conditions of release or bond;
8
9 (5) Issue an injunction ordering Respondents not revoke Petitioners' grant of
10 release without providing prior written notice, an opportunity to respond, and
11 be represented by counsel prior to deprivation of liberty when the individual
12 is not yet subject to a final order of removal;
13
14 (6) Issue an injunction prohibiting the transfer of Petitioners outside of the
15 jurisdictional limits of this Court;
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17 (7) Enter a judgment declaring that Respondents' detention of Petitioners
18 is and will be unauthorized by statute and contrary to law;
19
20 (8) Award Petitioners reasonable costs and attorney fees.
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Date: 12/14/2025

Verified and Submitted by

s/ Nicolette Glazer Esq.

Nicolette Glazer Esq.

LAW OFFICES OF LARRY R GLAZER

2121 Avenue of the Stars #800

Century City, CA 90067

T: 310-407-5353

F: 310-407-5354

nicolette@glazerandglazer.com

ATTORNEY FOR PETITIONERS

PETITION FOR HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF; - 22

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PETITION FOR HABEAS CORPUS AND COMPLAINT FOR DECLARATORY AND
INJUNCTIVE RELIEF; - 23

My name is Maribel Catalan Ramirez and I am over 18 years old and the following is my declaration is truth and correct to the best of my knowledge

1. My name is Maribel Catalan Ramirez
2. I am from Guatemala.
3. I am 52 years old.
4. I have entered in the United States over 19 years ago.
5. I speak Spanish.
6. I escaped from my country because I have fear to return to my country.
7. I have court proceeding pending with the immigration court.
8. On 11/12/2025, I was selling items on the street and there was a lot of people on the street buying items. There were few masked people who were unidentified grabbing people on the street. They grabbed 4 people including me. It was a chaos and all of us were Hispanic. They slammed me on the ground and being very aggressive towards me. I didn't know what was going on. They handcuffed me and took me to their car. I didn't know who these people were and didn't know if they were officers or criminals.
9. I stayed in Los Angeles for 2 days then they transferred me to Adelanto.
10. I am very sick now at detention center. They took me to the hospital and I stayed there for 8 days. I was there for an emergency. It is very cold there and I didn't have enough clothes and blankets. I have so much fear inside and I worry so much about my life.
11. There are a lot of people together stayed in the same room.
12. They gave us food that is not eatable at all.
13. I am very depressed and I am under a lot of stress inside.
14. I could not sleep because of my medical condition. It is a nightmare to me about what happened on 11/12/2025. I came to this country to seek refugee because of the country condition in my country. I never expected to have those inhuman treatments like this. When I slept at night, I would have nightmare about what happened on 9/3/2025
15. I miss my family and my child.
16. I feel very helpless and vulnerable under this circumstance and I am so afraid of my life if I continue to stay inside.
17. I need to get out of there since my family needs me.
18. I miss my family and I need your help

Juan Catalan FOR Maribel Catalan



An official website of the United States government
Here's how you know



EOIR Automated Case Information

Court Closures Today December 6, 2025

Please check <https://www.justice.gov/eoir-operational-status> for up to date closures.

[Home](#) > CATALAN RAMIREZ, MARIBEL



Automated Case Information

Name: CATALAN RAMIREZ, MARIBEL | A-Number:



| Docket Date: 11/21/2025



Next Hearing Information

Your upcoming **MASTER** hearing is on **December 16, 2025** at **8:00 AM**.

JUDGE

Maury, Carlos E.

COURT ADDRESS

10400 RANCHO ROAD
ADELANTO, CA 92301

My name is Melisa Aguilar Centes and I am over 18 years old and the following is my declaration is truth and correct to the best of my knowledge

1. My name is Melisa Aguilar Centes
2. I am from El Salvador.
3. I am 23 years old.
4. I have entered in the United States over 12 years ago.
5. I escaped from my country because I have fear to return to my country.
6. I have court proceeding pending with the immigration court.
7. On 11/17/2025, I was at my boyfriend's home and got a phone call from the law enforcement and told me to go back to my house. When I arrived at my house, there were 10 people there and armed. The law enforcement arrested me at that time and I went to the Federal court for another case and they released me on bond. However, they never released me but turned me to the ICE. They didn't explain to me why I was being arrested by ICE. They took me to Los Angeles ICE detention center.
8. I stayed in Los Angeles for 1 day then they transferred me to Adelanto.
9. I am very sick now at detention center. It is very cold there and I didn't have enough clothes and blankets. I have so much fear inside and I worry so much about my life.
10. There are a lot of people together stayed in the same room.
11. They gave us food that is not eatable at all.
12. I could not sleep at night because I have a lot of pains at my back. My mental health is deteriorating because of the situation
13. I am very depressed and I am under a lot of stress inside.
14. I could not sleep because of my medical condition. It is a nightmare to me about what happened on 11/17/2025. I came to this country to seek refugee because of the country condition in my country. I never expected to have those inhuman treatments like this. When I slept at night, I would have nightmare about what happened on 11/17/2025
15. I miss my family.
16. I feel very helpless and vulnerable under this circumstance and I am so afraid of my life if I continue to stay inside.
17. I need to get out of there since my family needs me.
18. I miss my family and I need your help

- Josue Zuniga for Melisa Aguilar Centes

NOTICE OF HEARING IN REMOVAL PROCEEDINGS
IMMIGRATION COURT
10250 RANCHO RD., SUITE 201A
ADELANTO, CA 92301

RE: AGUILAR-CENTES, MELISA

FILE: 

DATE: Nov 18, 2025

TO: Law offices of Vivian N Szawarc
Szawarc, Vivian Noemi
4929 Wilshire Blvd.
Suite 820
Los Angeles, CA 90010

Please take notice that the above captioned case has been scheduled for a VIDEO hearing before the Immigration Judge on Dec 23, 2025 at 08:00 A.M.. The alien will be present via tele/video. All other parties and witnesses should report to:

10400 RANCHO ROAD
ADELANTO, CA 92301

You may be represented in these proceedings, at no expense to the Government, by an attorney or other individual who is accredited to represent persons before an Immigration Judge. Your hearing date has not been scheduled earlier than 10 days from the date of service of the Notice to Appear in order to permit you the opportunity to obtain an attorney or representative. If you wish to be represented, your attorney or representative must appear at the hearing prepared to proceed. You can request an earlier hearing in writing.

Failure to appear at your hearing except for exceptional circumstances may result in one or more of the following actions: (1) You may be taken into custody by the Department of Homeland Security and held for further action. OR (2) Your hearing may be held in your absence under section 240(b)(5) of the Immigration and Nationality Act. An order of removal will be entered against you if the Department of Homeland Security established by clear, unequivocal and convincing evidence that you or your attorney have been provided this notice and you are removable.

IN THE EVENT YOU ARE RELEASED FROM CUSTODY, WITHIN FIVE DAYS OF YOUR RELEASE, YOU MUST PROVIDE TO THIS IMMIGRATION COURT A WRITTEN NOTICE/EOIR-33 OF THE ADDRESS AND TELEPHONE NUMBER AT WHICH YOU CAN BE CONTACTED REGARDING THESE PROCEEDINGS. CORRESPONDENCE FROM THE COURT, INCLUDING HEARING NOTICES, WILL BE SENT TO THE MOST RECENT ADDRESS YOU HAVE PROVIDED, AND WILL BE CONSIDERED SUFFICIENT NOTICE TO YOU AND THESE PROCEEDINGS CAN GO FORWARD IN YOUR ABSENCE.

A list of free legal service providers has been given to you. For information regarding the status of your case, call toll free 1-800-898-7180 or 304-625-2050.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL [M] PERSONAL SERVICE [P] ELECTRONIC SERVICE [E]
TO: [] ALIEN [] ALIEN c/o Custodial Officer [] ALIEN's ATT/REP [] DHS
DATE: 11/18/25 BY: COURT STAFF A. Madera

Attachments: [] EOIR-33 [] EOIR-28 [] Legal Services List [] Other
VW



An official website of the United States government

Here's how you know



EOIR Automated Case Information

Court Closures Today December 6, 2025

Please check <https://www.justice.gov/eoir-operational-status> for up to date closures.

[Home](#) > **AGUILAR-CENTES, MELISA**



Automated Case Information

Name: AGUILAR-CENTES, MELISA | A-Number:



| Docket Date: 9/22/2025



Next Hearing Information

Your upcoming **MASTER** hearing is on **December 23, 2025 at 8:00 AM.**

JUDGE

Maury, Carlos E.

COURT ADDRESS

10400 RANCHO ROAD

ADELANTO, CA 92301

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

DOB: [REDACTED]

Even: [REDACTED]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

FINS: 1387244861

File No: [REDACTED]

In the Matter of:

Respondent: MELISA AGUILAR-CENTES

currently residing at:

(Number, street, city, state and ZIP code)

(Area code and phone number)

- ☐ You are an arriving alien.
- ☒ You are an alien present in the United States who has not been admitted or paroled.
- ☐ You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of EL SALVADOR and a citizen of EL SALVADOR;
3. You entered the United States at or near Unknown, on or about unknown date;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- ☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- ☐ Section 235(b)(1) order was vacated pursuant to: ☐ 8CFR 208.30 ☐ 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

10400 RANCHO RD, ADELANTO, CA 92301

(Complete Address of Immigration Court, including Room Number, if any)

on 11/18/2025 at 8:00 AM to show why you should not be removed from the United States based on the charge(s) set forth above.

V. TSARKOV - SDDO

(Signature and Title of Issuing Officer)

Date: September 18, 2025

Los Angeles, CA

(City and State)

Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the Internet at <http://www.ice.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(a)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

(Signature of Respondent)

Date: _____

(Signature and Title of Immigration Officer)

Certificate of Service

This Notice To Appear was served on the respondent by me on September 18, 2025, in the following manner and in compliance with section 239(a)(1) of the Act.

- ☒ in person ☐ by certified mail, returned receipt # _____ requested ☐ by regular mail
☐ Attached is a credible fear worksheet.
☒ Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the English language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

REFUSED TO SIGN
(Signature of Respondent if Personally Served)

B 9523 DOMINGUEZ - Deportation Officer
(Signature and Title of officer)

Privacy Act Statement

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or Individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

U.S. Department of Homeland Security

Continuation Page for Form I-862

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