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6 UNITED STATES DISTRICT COURT
7 CENTRAL DISTRICT OF CALIFORNIA
8 EASTERN DIVISION

9 Yessenia Alvarez Cabanillas,
10
11 Petitioner,

12 v.

13 GEO Group, Inc., a Florida corporation,
14 operating the Adelanto ICE Processing Center;
15 Kristi NOEM, Secretary of the Department of
16 Homeland Security; Pamela BONDI, U.S.
17 Attorney General; in their official capacity;
18 Moises BECERRA, in his official capacity as
19 Field Office of Immigration and Customs
20 Enforcement, Enforcement and Removal
21 Operations.

22 Respondents.

Case Number: 5:25-cv-03484-ODW-PVC

**NOTICE OF NONCOMPLIANCE WITH
TRO**

23 PLEASE TAKE NOTICE, this Court issued a Temporary Restraining Order on
24 December 24, 2025 ordering Petitioner's "IMMEDIATE RELEASE." Respondents have
25 released Petitioner from physical detention at the California City Detention, but had her report
26 for the outfitting of a GPS ankle monitor on December 26, 2025. *See* Document 8-2. For
27 purposes of habeas corpus relief, a GPS ankle monitor is a substantial restraint on her liberty
28 meaning that she is still "in custody" and has not been released. Petitioner seeks an
"IMMEDIATE RELEASE" from Respondents' GPS monitoring pursuant to the TRO.

Date: January 2, 2026

Respectfully Submitted,
/s/ Mario Salgado
Mario Salgado, Esq.

CERTIFICATE OF SERVICE

I, Mario Salgado, am over the age of 18 years and maintain a business address located at 605 Market Street Suite 1111 in San Francisco, California 94105. I mailed the **NOTICE OF NONCOMPLIANCE WITH TRO** to:

GEO Group, Inc. Attn: Corporate Creations Network Inc. [C2250455] 7801 Folsom Boulevard, #202 Sacramento, CA 95826

I served Respondent's BONDI, NOEM, and BECERRA through the U.S. Attorney's Office
Via this electronic filing system.

I swear under penalty of perjury under the laws of the United States of America that the foregoing is true and correct:

Date: January 2, 2026

/s/ Mario Salgado
Mario Salgado, Esq.