

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ROSA PADILLA PAZ,

Petitioner,

v.

HERNANDEZ, et al.,

Respondents.

Case No. 2:26-cv-01394

DECLARATION OF

JARVIN LI

I, Jarvin Li, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am a Deportation Officer ("DO") employed by the U.S. Department of Homeland Security ("DHS"), U.S. Immigration and Customs Enforcement ("ICE"), Enforcement and Removal Operations ("ERO"). I am currently assigned to the ERO San Francisco Field Office.
2. In my official capacity, I manage the detention and removal of noncitizens, including executing removal orders, coordinating with foreign governments, and maintaining case records in official DHS systems. I make this declaration based on my review of those systems and records, and on my familiarity with the case of Rosa Padilla Paz ("Petitioner").
3. Petitioner is a native and citizen of Honduras who, who entered the United States on an unknown date and at an unknown location, without being admitted or paroled.
4. On June 15, 2007, Petitioner was convicted of merchandise theft in San Mateo, California, and sentenced to 12 months probation.
5. On February 3, 2010, Petitioner was arrested in San Francisco, California for cocaine distribution.

- 1 6. On February 11, 2010, Petitioner was encountered by ICE officers at the San Francisco
2 County Jail. The ICE officers determined Petitioner was an alien present in the United
3 States without being admitted or paroled and detained him. Based on her
4 representations, Petitioner was issued a Notice to Appear ("NTA") alleging her to be a
5 native and citizen of Mexico and charging removability under Immigration Nationality
6 Act ("INA") § 212(a)(6)(A)(i), and placed in removal proceedings in the San Francisco,
7 California Immigration Court.
- 8 7. On February 11, 2010, Petitioner, pro se, signed a sworn statement claiming the factual
9 allegations in the NTA were true, waiving any relief from removal, and requesting her
10 removal to Mexico.
- 11 8. On February 11, 2010, Petitioner was ordered removed to Mexico by an Immigration
12 Judge ("IJ") in San Francisco, California. Petitioner was removed to Mexico at the San
13 Ysidro, California Port of Entry and prohibited from entering, or attempting to enter, the
14 United States for a period of 10 years.
- 15 9. On an unknown date after being removed, Petitioner again entered the United States at
16 an unknown location, without being admitted or paroled.
- 17 10. On October 5, 2010, Petitioner was arrested in San Francisco, California for cocaine
18 distribution.
- 19 11. On October 8, 2010, Petitioner was encountered by ICE officers at the San Francisco
20 County Jail. Petitioner, pro se, signed a sworn statement claiming to being born in, and a
21 citizen of, Mexico.
- 22 12. On October 8, 2010, ICE reinstated Petitioner's prior removal order to Mexico.
23 Petitioner was removed to Mexico at the San Ysidro, California Port of Entry and
24

1 prohibited from entering, or attempting to enter, the United States for a period of 20
2 years.

3 13. On an unknown date after being removed, Petitioner once again entered the United
4 States at an unknown location, without being admitted or paroled.

5 14. On March 1, 2011, Petitioner was convicted of cocaine distribution in San Francisco,
6 California, and sentenced to 4 days imprisonment and 3 years probation.

7 15. On April 16, 2014, Petitioner was arrested for cocaine distribution in San Francisco,
8 California. The charges were not pursued.

9 16. On June 2, 2025, Petitioner was identified by ICE officers outside her residence in San
10 Francisco, California and detained pursuant to an arrest warrant. Petitioner claimed fear
11 of returning to her country of citizenship and was issued a Notice to Appear ("NTA")
12 charging removability under Immigration Nationality Act ("INA") § 212(a)(6)(A)(i),
13 and placed in removal proceedings in the Tacoma, Washington Immigration Court

14 17. On October 10, 2025, Petitioner, with counsel, appeared at a merits hearing before an IJ
15 in Tacoma, Washington. The IJ denied applications for relief from removal and ordered
16 Petitioner removed to Honduras. Petitioner, through counsel, appealed the IJ's order of
17 removal to the Board of Immigration Appeals ("BIA"). That appeal is still pending.

18 18. On October 21, 2025, Petitioner, with counsel, appeared at a bond hearing before an IJ
19 in Tacoma, Washington. The IJ ruled that there is no jurisdiction to consider bond. The IJ
20 ruled, in the alternative, that if the IJ had jurisdiction, then the IJ would deny bond based
21 on danger and flight risk. The IJ found drug trafficking activities to be a danger to the
22 community. The IJ also found, citing multiple false statements and illegal entries, the
23 Petitioner to be, "an extremely poor bail risk. No amount of bail or condition of parole
24 will ensure her presence at future hearings (or her surrender to immigration officers for

1 removal if her appeals are not successful)." Petitioner, through counsel, appealed the IJ's
2 denial of bond to the BIA. That appeal is still pending.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed at San Francisco, California, dated May 8, 2026.

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6 Jarvin Li
7 Deportation Officer
8 U.S. Department of Homeland Security
9 U.S. Immigration and Customs Enforcement
10 Enforcement and Removal Operations
11 San Francisco Field Office
12 San Francisco, California
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