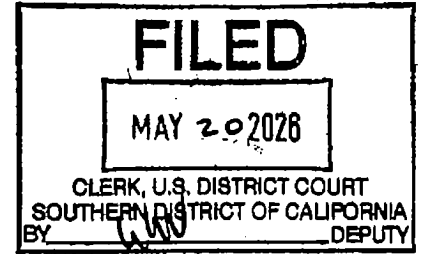


**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**



Rafael Gonzalez-Ramos

Petitioner,

v.

**INJUNCTIVE RELIEF
TEMPORARY RESTRAINING ORDER**

Todd Blanche, U.S. Attorney General,
Markwayne Mullin, Secretary of DHS,
Todd Lyons, Director of ICE,
Christopher LaRose Warden of Otay Mesa Detention Center
Respondent's

'26CV3159 JLS GC

**MOTION FOR TEMPORARY RESTRAINING ORDER,
AND
INJUNCTIVE RELIEF**

TEMPORARY RESTRAINING ORDER

Petitioner-Plaintiff, Rafael Gonzalez-Ramos moves this court ex parte for a Temporary Restraining Order that would among other things, require his immediate release from his ongoing detention by agents of Immigration and Customs Enforcement (ICE) and prohibit his re-arrest without pre-detention hearing before an "IJ" Immigration Judge at which ICE establishes by clear convincing evidence that his detention is necessary to prevent his flight risk or protect the public.

Background :

The evidence before this court establishes that Rafael Gonzalez-Ramos is a 35-year old from Mexico who entered the United States on year 2002 with his older brother since Petitioner was just a kid of 11 years of age, Petitioner immediately enrolled into school and learned the American language. Petitioner studied up to the 11th grade and dropped out of school to work and help with the house bills. Petitioner began working in construction and began developing good working skills plus responsibility towards his family. At age 18 Petitioner was arrested in San Diego to later be given a voluntary departure. Petitioner returned to the United States and remained out of trouble and to working. At age 21 Petitioner suffered another arrest for a prior arrest warrants. Petitioner was released by ICE with an ankle monitor for 1 year period. Petitioner was released on a ICE program called I-sap were Petitioner would constantly receive an agent at his house and once a month would have to check-in at the office. Petitioner never violated the I-sap program or conditions. Petitioner has a pending USCIS marriage process which Petitioner will highly succeed on. On 1-14-2026 Petitioner was detained and released under own recognizance, to later show up to his hearings. Here ICE violated Petitioner's Due Process Right under the U.S. Constitution by arresting Petitioner without a warrant after Petitioner was walking out of the court house from his

3rd court appearance in San Diego . Petitioner did nothing wrong and here it is clear that ICE is and has been abusing the Authority which is illegal. Here Petitioner has no Attempt of Escape clearing him from a "Flight Risk" and also has no, Violent or Aggravated Convictions on his criminal history which clears him for the "Danger to the Community". Petitioner here request that this Honorable Court to approve this Habeas Corpus and Temporary Restraining Order since the "IJ" Court Judges are under pressure from the "DOJ" Department of Justice and President Donald J. Trump to deny bonds and Asylum cases. There is evidence that establishes this information that President Donald J. Trump through the "DOJ" has fired over 100 Immigration Judges over the United States. Donald trump's administration has fired or forced out roughly 100 immigration judge's since the president took office, including more than a dozen in the last two weeks alone. The administration purged at least eight immigration judges from New York city Monday, according to the union that represents them. another five judges in San Francisco were fired last month without explanation. Unlike Federal District courts, Immigration Courts operate under the Department of Justice and at the direction of the Attorney General. Trump's radical overhaul of the nation's immigration system has upended the courts that keep it running to expedite his mass deportation agenda. One of the judges in New York is Amiena khan, the assistant chief immigration judge at 26 federal plaza, a federal complex in Manhattan that houses immigration agencies and courtrooms. the departures have whittled the number of immigration judges down from 715 to roughly 600, marking a 16 percent drop within 11 months. Dozens of the other judges have retired or resigned since the start of the Trump's administration That is why Petitioner request that this Honorable Court through his Habeas Corpus be approved for a Immediate Release.

Petitioner request that this court grant the Temporary Restraining Order so Respondent's cannot transfer Petitioner out of the Jurisdiction of the court or from Otay Mesa Detention Center until the Habeas Corpus is adjudicated. My health has worsen because I have developed depression,

anxiety, and major stress disorder because of the prolonged detention I have spent in custody and not being able to be by my immediate family. I have not received any incident reports for misbehavior since I have been detained here at Otay Mesa Detention Center and have been in good behavior while in ICE custody. I am requesting for this Temporary Restraining Order to be put in place so ICE won't be able to transfer me or deport me.

CITING CASE LAW: Jose Antonio Ambrocio Garcia case No. 25-cv-03319 (2025)
Carmen Araceli Pablo Sequen Case No. 25-cv-06487
and F.T.C. v. Dean Foods and many more other cases that are
being gathered.

Date: 5-13-2026

Sincerely

Rafael Gonzalez-Ramos


Otay Mesa Detention Center
P.O. Box 439049
San Diego, CA 92143