OMAIRA ALEXANDRA JAIMES GÓMEZ

FILED
JUL 0 8 2026
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____ DEPUTY CLERK

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

Case No. SA26CA4293

OG

Omaira Alexandra Jaimes Gómez,	§	
	§	
Petitioner,	§	
	§	
v.	§	**No.** [redacted]
	§	
The Warden (Facility director),	§	
Dilley Immigration Processing Center,	§	
The Field Office Director, ICE	§	
San Antonio Field Office	§	
Alejandro Mayorkas.	§	
Secretary *of the Department*	§	
of Homeland Security.	§	
	§	
Respondents.		

PETITION FOR WRIT OF HEBEAS CORPUS
APPLICATION FOR IMMEDIATE RELEASE HUMANITARIAN PAROLE FOR PREGNANCY AND ACUTE MEDICAL CONDITION

28 U.S.C. § 2241

This petition challenges the legality of Petitioner's continued immigration detention. Petitioner respectfully requests release from detention, or in the alternative bond hearing before an Immigration Judge. Petitioner is not a danger to the community and not a flight risk. Petitioner has a custodian, a residence and strong family support. Petitioner will attend all immigration court proceedings as required.

07, 02, 2026

Office of the Clerk
United States District Court for the Western District of Texas
San Antonio Division
John H. Wood, Jr. United States Courthouse
262 West Nueva Street
San Antonio, Texas 78207
Email: txwd_habeas_sa@txwd.uscourts.gov

RE: EMERGENCY PRO SE SUBMISSION – PETITION FOR WRIT OF HABEAS CORPUS (28 U.S.C. § 2241)
Petitioner: OMAIRA ALEXANDRA JAIMES GÓMEZ
Alien Registration Number (A-Number): [redacted]
Current Location: Dilley Immigration Processing Center (Dilley, TX)

Dear Clerk of the Court,

I am writing to formally file the enclosed **Petition for a Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241 and Complaint for Emergency Declaratory and Injunctive Relief.** I am submitting this action *Pro Se*, as I do not currently have legal representation.

Please take administrative notice that this is an **urgent and time-sensitive emergency submission.** I am a twenty-year-old Colombian national, currently **three months pregnant, and severely ill** under administrative immigration custody at the Dilley Immigration Processing Center since June 21. My ongoing confinement and the lack of specialized external obstetric and gynecological care pose an immediate, irreparable risk of miscarriage and a direct threat to my life and physical integrity.

Enclosed in this filing packet, please find the following documents for immediate registration and review by a District Judge:

1. This Formal Cover Letter.
2. The Completed Petition for a Writ of Habeas Corpus (Caption Page, Introduction, Jurisdiction, Venue, Statement of Facts, Claims, and Prayer for Relief).
3. Supporting Exhibits *(Copy of identity documents and sponsor support letter).*

Because I am currently incarcerated and facing an active medical emergency, I respectfully request the Clerk's Office to process this petition immediately, assign a case number, and forward these pleadings to the duty judge for emergency consideration.

Thank you for your prompt attention and assistance in this urgent matter.

Respectfully submitted,



Omaira Alexandra Jaimes Gómez
Petitioner, Pro Se
Dilley Immigration Processing Center
Dilley, Texas

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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
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San Antonio Field Office	§	
Alejandro Mayorkas.	§	
Secretary *of the Department*	§	
of Homeland Security.	§	

PETITION FOR WRIT OF HEBEAS CORPUS
APPLICATION FOR IMMEDIATE RELEASE HUMANITARIAN PAROLE FOR PREGNANCY AND ACUTE MEDICAL CONDITION

This is a petition for habeas corpus and immediate release under the figure of **Humanitarian Parole** or **Parole (Release on Recognizance / Mandate of Supervision)** for the Colombian citizen **Omaira Alexandra Jaimes Gómez**. This request is based on urgent humanitarian reasons due to his critical and vulnerable medical condition, seeking relief to remedy his illegal detention. Defendants are detaining Ms. **Omaira Alexandra Jaimes Gómez,** pending execution of her final order to appear before the judge for pending asylum hearing. Ms. **Omaira Alexandra Jaimes Gomez,** has cooperated fully with the defendants, has been detained for more than eight (8) days. Ms. **Omaira Alexandra Jaimes Gomez,** does not pose a flight risk or a danger to the community. Prior to his arrest, he reported to the Immigration Service and had not committed any crime. Ms. **Omaira Alexandra Jaimes Gómez** submits this request based on the following:

FACTUAL BASIS

1. **Pregnancy Status**: The petitioner is currently in her first trimester of gestation (3 months of pregnancy).

2. **Health Condition:** The petitioner is severely ill within the facility. The lack of immediate access to specialized gynecological and continuous prenatal care puts the well-being of the pregnancy and her own physical integrity at imminent risk.

3. **Date of Arrest**: She was taken into ICE custody on **June 21.** As he does not have legal representation or a criminal record, his detention contravenes the principle of minimum restriction of liberty for vulnerable people.

LEGAL GROUNDS

1. **ICE's National Pregnancy Directive:** ICE's current policies explicitly instruct that pregnant, postpartum, or breastfeeding women should not be subject to immigration detention, except under exceptional national security circumstances that do not apply in this case.

2. **Section 212(d)(5)(A) of the Immigration Act (INA):** Empowers the Director of the Field Office to grant *Parole* for severe medical reasons and urgent humanitarian grounds.

ASSISTANCE PLAN ABROAD:

If released, the petitioner will not be a public charge and will attend all of her mandatory immigration appointments. You will reside at the address of your sponsor, who will ensure your transportation to the necessary medical services and compliance with your supervisions.

1. **U.S. Sponsor Name:** JACQUELINE OLQUIN
2. **Residence Address:** [redacted]
3. **Contact Phone:** [redacted]

My prolonged detention may result in:

Danger of miscarriage: The first trimester (3 months) is the most vulnerable stage of fetal development. The extreme stress of confinement, dehydration and the lack of specialized monitoring drastically increase the risk of pregnancy loss.

Malnutrition and poor development: The diet of a detention center does not cover the nutritional requirements or vitamin supplements (such as folic acid) essential to prevent

malformations or low birth weight.

Severe untreated infections: An active disease without a clear diagnosis can escalate quickly. Infections in pregnant women increase the risk of preterm birth or direct damage to fetal organs.

CUSTODY

1. Ms. Omaira Alexandra Jaimes Gomez is in the custody of Dilley, Immigration Processing Center, The Department Homeland Security (DHS).

   San Antonio Field Office, For the Western District of Texas San Antonio Division.

At the time of filing this petition, the Petitioner is being held at **the Dilley immigration processing center,** Texas, Mr. Omaira Alexandra Jaimes Gomez is under the direct control of the Defendants and their agents.

JURISDICTION

1. This action arises under the Constitution of the United States, the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1101 et seq., as amended. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 2241; Article I, § 9, cl. 2 of the United States Constitution (the "Suspension Clause"); and 28 U.S.C. § 1331, because the Petitioner is currently in custody under color of the authority of the United States, and such custody is in direct violation of the Constitution, laws, treaties, and binding executive directives of the United States. This Court has the authority to grant declaratory and injunctive relief pursuant to 28 U.S.C. § 2241, the All-Writs Act, 28 U.S.C. § 1651, and the Declaratory Judgment Act, 28 U.S.C. §§ 2201–2202.

VENUE

1. Venue is proper in the United States District Court for the Western District of Texas, San Antonio Division, pursuant to 28 U.S.C. § 1391(e) and 28 U.S.C. § 2241. The Western District of Texas is the judicial district where the Petitioner is currently and physically

detained at the Dilley Immigration Processing Center, and where the Respondents exercise their official duties and maintain legal custody over the Petitioner.

PARTIES AND RESPONDENTS

1. Petitioner **Omaira Alexandra Jaimes Gómez** is a national and citizen of Colombia who was allowed to enter through the border on May 3, 2024, after which she began her asylum process, which is currently pending.

2. Respondent **Miguel Vergara** is the Field Office Director for Enforcement and Removal Operations (ERO), U.S Immigration and Customs and Customs Enforcement (ICE) San Antonio Field Office. Respondent Vergara is a custodial officer acting within the judicial district of the United States District Court for the Western District of Texas, San Antonio Division. Respondent Vergara has constructive and ultimate legal custody over the Petitioner, and Petitioner remains detained pursuant to the policies and orders issued under Respondent's authority.

1. Respondent **The Warden (Facility Director) of the Dilley Immigration Processing Center** is the immediate physical custodian of the Petitioner. Respondent operates and manages the detention facility located in Dilley, Texas, within the judicial district of the United States District Court for the Western District of Texas, San Antonio Division. Pursuant to federal habeas corpus jurisprudence, Respondent is the proper immediate custodian because he exercises day to day physical control over the Petitioner's confinement.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

1. The Petitioner, **Omaira Alexandra Jaimes Gómez**, has exhausted all available administrative remedies to the extent required by law.

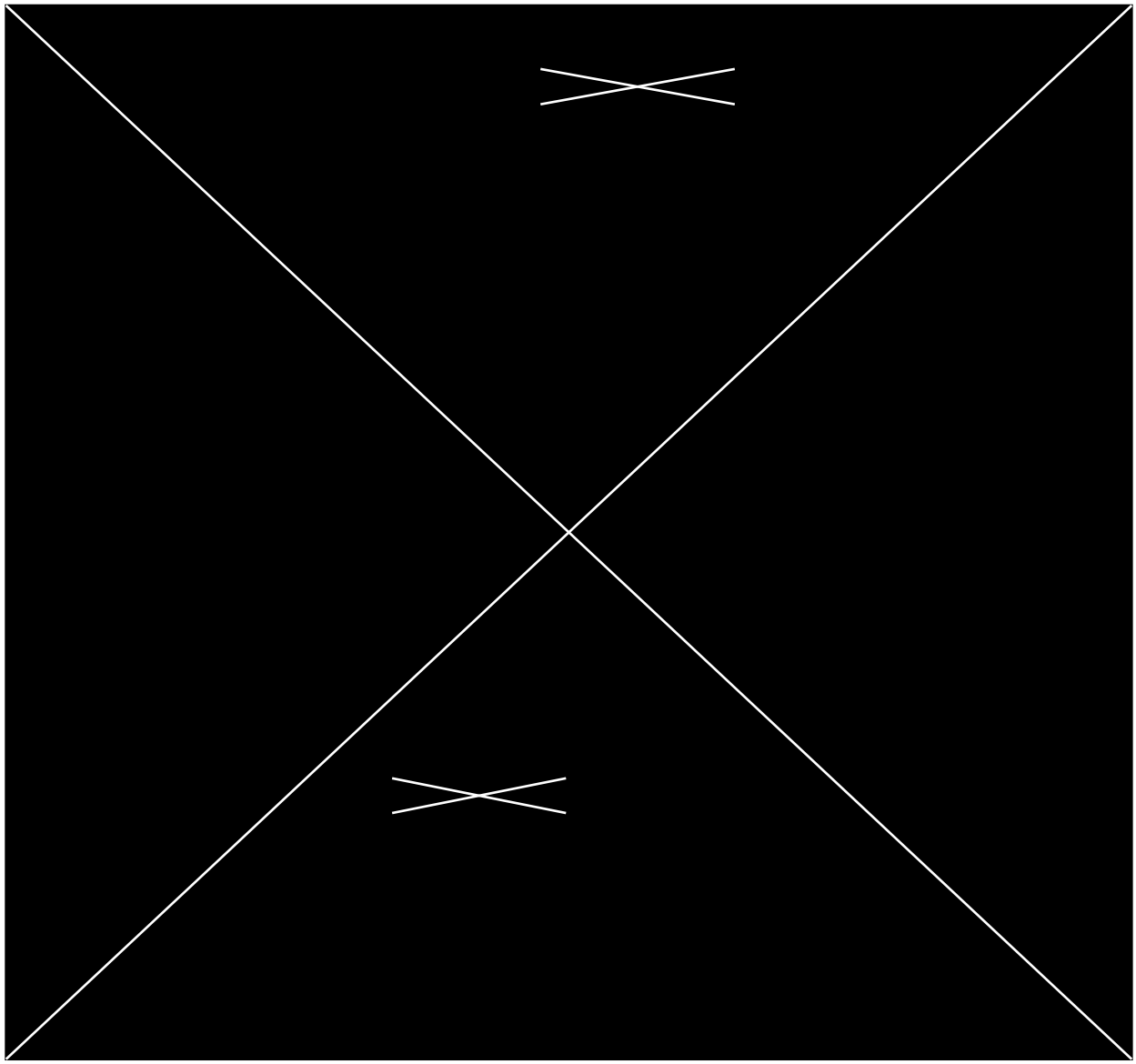
2. Petitioner has cooperated fully with Respondents at all times and has not delayed, obstructed, or impeded her immigration proceedings or her detention since her arrival on June 21.

3. The Petitioner's sole and extraordinary remedy to protect her constitutional rights and bodily integrity

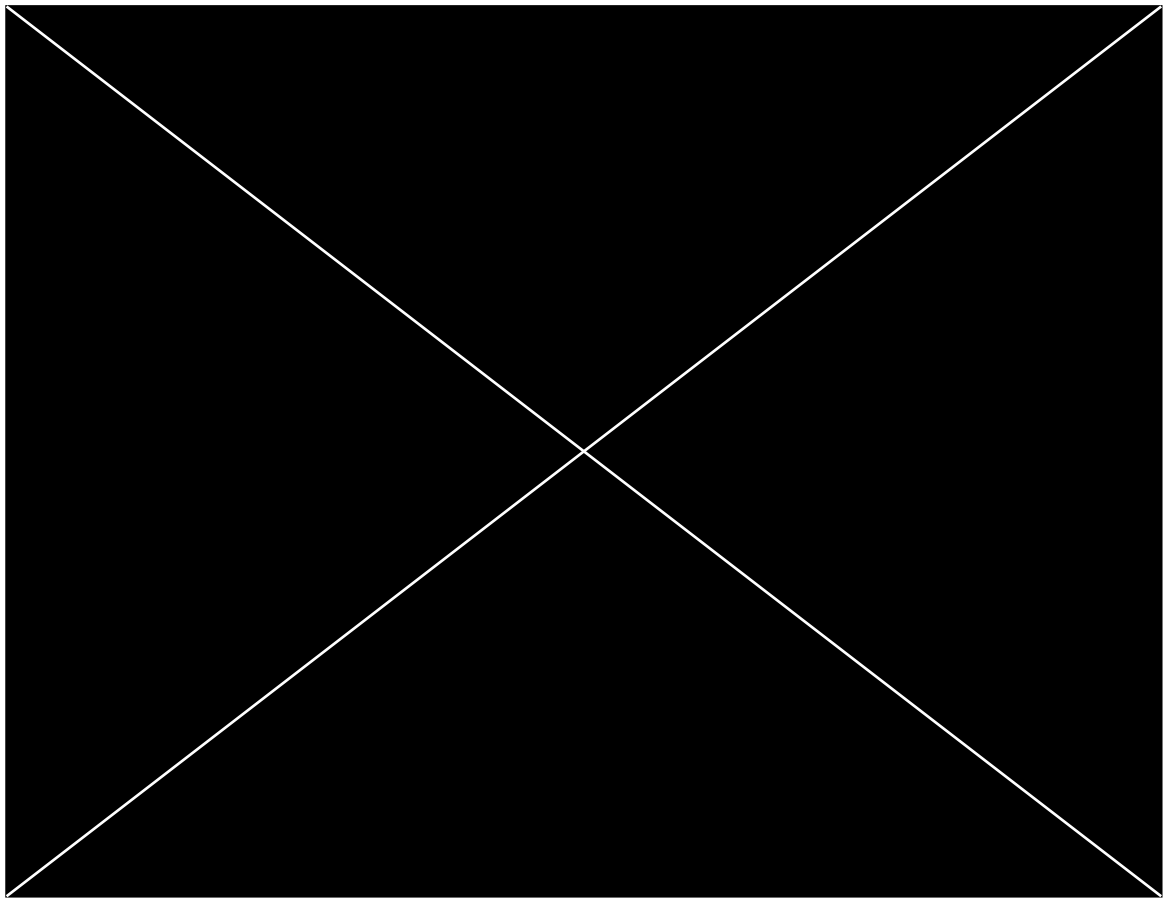
is through the filing of this federal judicial action.

STATEMENT OF FACTS

1. I, **Omaira Alexandra Jaimes Gómez** ([redacted]), am a twenty-year-old citizen and national of Colombia, born on [redacted], in Cúcuta, Norte de Santander. Prior to fleeing my country of origin, I maintained a long-term domestic partnership since 2018 with Luis Alejandro Díaz Vélez, and actively worked in a family-owned supermarket and retail enterprise managed alongside my mother-in-law, Margiore Vélez Ortiz.



3.



4.

5. Realizing that internal relocation was impossible due to the national and transnational reach of the "[redacted]," and with no effective protection from the Colombian state, I liquidated my remaining personal belongings. On April 29, 2024, I fled Colombia toward Mexico, encountering further extortion during transit. On May 3, 2024, I reached the United States border to formally surrender to federal immigration authorities and seek asylum.

6. On **June 21,** I was placed in administrative detention at the Dilley Immigration Processing Center. I am currently **three months pregnant and suffering from an active, severe medical illness** within the facility. Despite my high-risk gestational status, I am being denied access to adequate, continuous prenatal care and specialized obstetrical

evaluation. Confinement under these substandard conditions during my first trimester threatens my life and the life of my unborn child. I have no criminal record and I have a lawful sponsor in the United States ready to receive me.

PRAYER FOR RELIEF

WHEREFORE, I respectfully pray that this Court:

1. Issue a Writ of Habeas Corpus and order Respondents to release me immediately from administrative immigration custody under reasonable conditions of parole, supervision, or recognizance, so that I may receive proper medical care outside of a carceral environment.
2. Alternatively, issue an immediate injunction ordering Respondents to provide me with comprehensive, continuous, and specialized prenatal, gynecological, and urgent medical evaluation by a licensed external specialist while my release is being processed;
3. Enter a declaratory judgment stating that my ongoing administrative detention while three months pregnant and acutely ill violates my Fifth Amendment rights to Due Process and bodily integrity, as well as ICE's own binding Policy Directive 11032.4;
4. Grant any other further statutory, equitable, or injunctive relief that this Court deems just, proper, and necessary to protect my life and the safety of my pregnancy.

PETITIONER'S VERIFICATION AND DECLARATION UNDER PENALTY OF PERJURY

I, **Omaira Alexandra Jaimes Gómez**, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 and 28 U.S.C. § 2242, that I am the Petitioner in the foregoing Petition for a Writ of Habeas Corpus; that I have read the complete petition and know the contents thereof; and that all the statements of fact, timelines, and medical conditions related to my three-month pregnancy and active

illness contained therein are true and correct to the best of my personal knowledge, information, and belief.

Executed on this 07 day of 02, 2026, at the South Texas Family Residential Center in Dilley, Texas.

(Pro se)

Omaira Alexandra Jaimes Gómez

Exhibit A: Petitioner's Valid Passport (Identity Verification)

Exhibit B: Form I-220A / Order of Release on Recognizance (Prior Immigration Order)

U.S. Department of Homeland Security

Order of Release on Recognizance

File No. [redacted]
Date: [redacted]
Record Copy, DO

Name: ONAIRA ALEXANDRA [redacted]

You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

☒ You must report for any hearing or interview as directed by the Department of Homeland Security or the Executive Office for Immigration Review.

☒ You must surrender for removal from the United States if so ordered.

☒ You must report in (~~writing~~) (person) to AS INDICATED ON THE ATTACHED ORDER G-56
(Name and Title of Case Officer)

at _____ on _____ at _____
(Location of DHS Office) (Day of each week or month) (Time)

If you are allowed to report in writing, the report must contain your name, alien registration number, current address, place of employment, and other pertinent information as required by the officer listed above.

☒ You must not change your place of residence without first securing written permission from the immigration officer listed above.

☒ You must not violate any local, State, or Federal laws or ordinances.

☒ You must assist the Department of Homeland Security in obtaining any necessary travel documents.

☐ Other: _____

☐ See attached sheet containing other specified conditions (Continue on separate sheet if required)

NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by the Department of Homeland Security.

PHILIP M SMITH
Date: 2024.05.01 23:23:09 -07'00'
0248b7e382.CBP
(Signature of DHS Official)

Acting/Patrol Agent in Charge
(Printed Name and Title of Official)

Alien's Acknowledgment of Conditions of Release on Recognizance

I hereby acknowledge that I have (read) (had interpreted and explained to me in the SPANISH language) and understand the conditions of my release as set forth in this order. I further understand that if I do not comply with these conditions, the Department of Homeland Security may revoke my release without further notice.

[redacted]
(Signature of Immigration Officer Serving Order)

Ona Tatum
(Signature of Alien)

05/ /
(Date)

Cancellation of Order

I hereby cancel this order of release because ☐ The alien failed to comply with the conditions of release.

☐ The alien was taken into custody for removal.

(Signature of Immigration Officer Canceling Order) (Date)

Form I-220A (Rev. 08/01/07)N

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 free legal 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 apparently be 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 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 federal 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 set 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(e)(1), such action complied with 8 U.S.C. § 1367.

Upon information and belief, the language that the alien understands is SPANISH.

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 May 4, 2024, 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 organizations and attorneys which provide free legal services.

The alien was provided oral notice in the SPANISH 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.

(Signature of Respondent if Personally Served)

Border Patrol Agent

(Signature and Title of Officer)

A-FILE JACKET STARTER

A-File Number [redacted] Subject ID [redacted]

CONTROL Name (Last, First, Middle) JAIMES GOMEZ, OMAIRA ALEXANDRA			Event # [redacted]
Birthdate [redacted]	Age 18	Gender F	FBI # [redacted]
Date of Action 05/03/2024	Location Code SDC/FLD		Family #
Country of Birth COLOM			Country of Citizenship COLOM
Date, Place, and Time of Last Entry/Attempted Entry 05/03/2024 0600 - OTAY MESA, CA - S OF I-94, 250 MONUMENT TO HELO PAD, W			Fins # [redacted]
Method of Apprehension Patrol Border	At / Near BRF-23 - HELO PAD TO BM# 248, S		Apprehension Date/Time 05/03/2024 1000
Apprehending Agent DICKENS EDWARD			

Intake Guide (check if completed / required)

- ☐ Family Unit Created (If Necessary)
- ☐ Biometrics Submitted
- ☐ Placed in a Cell
- ☐ FPQ2
- ☐ Record Check or Additional Checks
- ☐ Disposition Categorized
- ☐ CDS
- ☐ A# Issued and e3 Updated

Processing Guide

- ☐ E3 DM Updates
- ☐ Booking
- ☐ Processing Complete Action
- ☐ Subject Manifested or Booked Out



CDS / Disposition Guide

Processing Priority
Low

Criminal History
○ Yes ◉ No

Prosecution
○ Yes ◉ No

Prosecution Charge
- ☐ 1324
- ☐ 1325
- ☐ 1326
- ☐ Mat Wit
- ☐ _____

CDS Classification
- ☒ FIRA
- ☐ SOTA
- ☐ PERA
- ☐ CRMA
- ☐ FMUA
- ☐ SGDA
- ☐ TGDA

CDS Program
- ☐ CCI
- ☐ Str_Pros
- ☐ _____
- ☐ _____

Processing Disposition
- ☐ ER
- ☐ Reinstate
- ☐ VR
- ☐ WA/NTA
- ☒ NTA

Claims Fear?
○ Yes ○ No

DEPARTMENT OF HOMELAND SECURITY

NOTICE TO APPEAR

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

Subject ID: [redacted] FINS #: [redacted] File No: [redacted]

DOB: [redacted] Event No: [redacted]

In the Matter of:

Respondent: ONAIRA ALEXANDRA JAIMES GOMEZ currently residing at:

[redacted]

(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 COLOMBIA and a citizen of COLOMBIA ;
3. You arrived in the United States at or near OTAY MESA, CA , on or about May 3, 2024 ;
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:

800 DOLOROSA STREET, SUITE 300 SAN ANTONIO TX 78207

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

on March 16, 2026 (Date) at 09:00 AM (Time) to show why you should not be removed from the United States based on the charge(s) set forth above.

PHILIP SMITH Acting Patrol Agent in Charge

(Signature and Title of Issuing Officer)

Date: May 03, 2024 [redacted]

(City and State)

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 [illegible]. 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/publications-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.

Exhibit C: Credible Fear Application Processing & Asylum Fee Payment Receipt

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW

Payment Receipt

A payment has been processed for the following case before the Executive Office for Immigration Review.

For cases before the Immigration Court, please contact the Court that is currently hearing your case for questions regarding payment. For cases before the Board of Immigration Appeals (BIA), please contact the BIA Clerk's Office for questions regarding payment at (703) 605-1007.

A copy of this receipt must be included with the application, motion, or appeal that is filed with the Immigration Court or the BIA Clerk's Office. Failure to include a receipt showing proof of payment will result in rejection of the filing.

A-Number: [redacted]

Payment Tracking ID: [redacted]

Payment Processed On: 5/8/2026 1:57:26 PM EST

Payment Type: PLASTIC CARD

Payment Amount: $102.00

Filing Type: Court - Form I-589, Annual Asylum Fee for Asylum and for Withholding of Removal (AAF)

Save or print this receipt immediately. A copy will not be sent via email. The tracking ID is required to retrieve a duplicate receipt.

*Please note there is an **annual fee** for all asylum applications, which is due on the anniversary of each calendar year that an alien's asylum application remains pending; no fee-waiver or reduction in fee is permitted. **This fee must be paid timely.** Failure to pay within 30 days of the anniversary due date will likely result in pretermission of the asylum application and an order of removal. This will be the only notice that the alien will receive regarding this annual payment requirement. Payment of this fee can be made at https://epay.eoir.justice.gov/index.

Current annual fee amounts can be found at www.justice.gov/eoir/publications-appeals-motions-and-required-fees.

Exhibit D: Certified Medical Records (Official Pregnancy & Clinical Illness Proof)

Exhibit E: Letter of Support – Mother-in-Law

LETTER OF SUPPORT – MOTHER-IN-LAW

Re: Letter of Family Support and Humanitarian Plead for Release
Petitioner: OMAIRA ALEXANDRA JAIMES GÓMEZ
Alien Registration Number (A-Number): [redacted]

Dear Honorable Judge,

My name is Margiore Vélez Ortiz. I am writing this letter with a mother's heart, full of deep worry, fear, and profound sadness for my daughter-in-law, Omaira Alexandra Jaimes Gómez. Omaira is an essential part of our family, and I love and care for her as if she were my own daughter.

Omaira is a good, hardworking, and deeply peaceful young woman of twenty years old. She has never been a violent person, she has no criminal record, and she presents absolutely zero danger to anyone. She is a family-oriented woman who only wants to live in safety and peace.

I am extremely worried about her ongoing administrative confinement at the Dilley facility, but what causes me the most terror is the possibility of her being forced to return to Colombia. As detailed in her asylum claim, [redacted]

Furthermore, Omaira is currently three months pregnant and severely ill inside the detention center. The stress of incarceration during her first trimester, combined with the lack of specialized external gynecological care, poses an imminent and irreversible risk of miscarriage. The pain and constant anxiety of this critical situation are deeply affecting our entire family's emotional well-being. No family should have to live with the fear of losing both a daughter and an unborn grandchild under these carceral conditions.

I respectfully ask the Court, from the bottom of my heart, to please show compassion, exercise mercy, and grant Omaira the opportunity to be released under the custody of her designated sponsor. This will allow her to receive the urgent prenatal care she needs in a safe environment while continuing her immigration case.

Thank you for your time, consideration, and the humanity you can show toward my daughter-in-law and her pregnancy.

Respectfully submitted,

MARGIORE VÉLEZ ORTIZ
Mother-in-law of the Petitioner

State of Texas County of Bexar
The foregoing instrument was acknowledged before me
on this 19 day of June ,2026
by Margiore Vélez Ortiz ,
Notary Public Signature

MILEE ADRIANA
CORREA CARVAJAL
Notary ID #134411260
My Commission Expires
June 15, 2027

Exhibit F: Custodian Housing Declaration – JACQUELINE OLQUIN

CUSTODIAN DECLARATION – JACQUELINE OLQUIN

Date: 06/29/2026

To Whom It May Concern:

My name is Jacqueline olquin, and I am writing to inform the Court that I am willing to act as custodian for **Omaira Alexandra Jaimes Gómez** if he is released from immigration detention.

If Omaira is released, he will reside here:

[redacted]

I am fully willing and able to provide you with full financial support and reliable transportation to all of your mandatory appointments while your immigration case is still pending. I will ensure that you attend all scheduled immigration court hearings, ICE records, and any other required legal or administrative proceedings. I fully understand the deep responsibility of being your custodian, and I take that responsibility with the utmost seriousness.

Omaira does not represent a danger to the community at all and does not pose any flight risk. It has extensive family support, community support, and a safe environment waiting for your arrival. In addition, due to her current medical condition as a three-month pregnant woman suffering from an active illness, she requires immediate release to a stable and supportive environment where she can receive specialized and appropriate prenatal and gynecological care outside of a correctional facility.

Therefore, I respectfully ask this court and immigration authorities to exercise favorable discretion and release her into my custody, allowing her to protect her high-risk pregnancy and continue her asylum process while living safely in my care.

Thank you for your time, consideration, and prompt attention to this urgent humanitarian matter.

Sincerely,

Jacqueline Olquin

JACQUELINE OLQUIN
Sponsor and Custodian

State of Texas County of Bexar

The foregoing instrument was acknowledged before me on this 29 day of June, 2026 by Jacqueline Olquin.

Milee Adriana Correa Carvajal
Notary Public Signature

MILEE ADRIANA CORREA CARVAJAL
Notary ID #134411260
My Commission Expires June 15, 2027

Exhibit G: Certificate of Service

CERTIFICATE OF SERVICE

I, Omaira Alexandra Jaimes Gómez, hereby certify that I am the Petitioner in this action and that I am currently incarcerated at the South Texas Family Residential Center (Dilley Immigration Processing Center) in Dilley, Texas.

Pursuant to the federal prison mailbox rule, I certify that on this 07 day of 02, 2026, I placed a true and correct copy of the foregoing Petition for a Writ of Habeas Corpus, Cover Letter, and supporting documentation into the institutional mail system at this facility, in a sealed envelope with first-class postage prepaid, addressed to the Clerk of the Court for the United States District Court for the Western District of Texas (San Antonio Division), and for service upon the named Respondents as detailed below:

1. Respondent – Custodial Facility Director:
The Warden / Facility Director
South Texas Family Residential Center (Dilley Immigration Processing Center)
300 El Rancho Way
Dilley, TX 78017

2. Respondent – ICE Regional Custodian:
Miguel Vergara, Field Office Director
ICE Enforcement and Removal Operations (ERO)
San Antonio Field Office
1777 NE Loop 410, Suite 1500
San Antonio, TX 78217

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

Omaira Alexandra Jaimes Gómez
Petitioner, Pro Se
Alien Number: [redacted]

Exhibit I: Copy evidence of Colombia