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Pro Bono Attorney for Petitioner

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

ANDRES FELIPE OME OSORIO,

Petitioner,

v.

SERGIO ALBARRAN, Field Office Director of the San Francisco Immigration and Customs Enforcement Office; DAVID J. VENTURELLA, Acting Director of United States Immigration and Customs Enforcement; MARKWAYNE MULLIN, Secretary of the United States Department of Homeland Security; TODD BLANCHE, Acting Attorney General of the United States, acting in their official capacities,

Respondents.

CASE No. 3:26-cv-08783

NOTICE OF SUPPLEMENTAL INFORMATION

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On August 21, 2026, undersigned counsel submitted a petition for writ of habeas corpus and temporary restraining order motion in the present case. Dkts. 1–2.

In the opening paragraph of the Petition, undersigned counsel stated that Petitioner Andres Felipe Ome Osorio "has some criminal history, Petitioner has no criminal convictions." Dkt. 1 at ¶ 1. This statement is accurate and true.

This morning, Respondents' counsel contacted undersigned counsel to request more specific identification of Petitioner's criminal history, including juvenile dispositions. Undersigned counsel has now obtained the relevant documentation from Petitioner's immigration counsel that specifically identifies the criminal matters referenced in the opening paragraph. The following supplemental facts are entered into the record:

1. In September 2024, Petitioner was arrested and booked into Sonoma County Juvenile Hall. This is a sealed and dismissed juvenile disposition. See Sonoma County Probation Record. Ex. A. Disposition records indicate 09/17/24 "Booked and released from JH."

2. On March 2, 2025, Petitioner was arrested in connection with an alleged [redacted] This is a sealed and dismissed juvenile disposition. See Sonoma County Probation Record. Ex. A.

3. On July 4, 2026, Petitioner was charged with driving under the influence (DUI), in violation of California Vehicle Code §§ 23152(a) and 23152(b). See Sonoma County Criminal Case Information, Case No. 26CR05475. Ex. A. A settlement conference is scheduled for

September 23, 2026. Petitioner has not been convicted of these charges.

Undersigned counsel confirms that Petitioner has no criminal convictions. The specific identification of Petitioner's criminal matters does not affect the substance of Petitioner's constitutional claims regarding his detention without medical safety protocols, his deprivation of due process, or the absence of material changed circumstances justifying his re-detention.

Date: August 22, 2026

Respectfully submitted,

/s/ Elizabeth Knowles

Elizabeth Knowles
CA SBN #286077
Counsel for Petitioner