AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT

for the

Western Texas

(San Antonio Division)

FILED

SEP 23 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY: _____
DEPUTY

ARIANNY CAROLINA VILLALOBOS CHAPARRO, A# [redacted]

Petitioner

v.

WARDEN / FACILITY ADMINISTRATOR, DILLEY IMMIGRATION PROCESSING CENTER; FIELD OFFICE DIRECTOR, ICE ERO SAN ANTONIO; ACTING DIRECTOR, ICE; SECRETARY OF HOMELAND SECURITY; ATTORNEY GENERAL OF THE UNITED STATES

Respondent

(name of warden or authorized person having custody of petitioner)

Case No. SA26CV6102XR

(Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: Arianny Carolina Villalobos Chaparro

   (b) Other names you have used: Arianny Carolina Villalobos-Chaparro; Ari Villalobos; Ari Carolina Villalobos

2. Place of confinement:

   (a) Name of institution: Dilley Immigration Processing Center

   (b) Address: 300 El Rancho Way
   Dilley, Texas 78017

   (c) Your identification number: A# [redacted]

3. Are you currently being held on orders by:

   ☒ Federal authorities ☐ State authorities ☐ Other - explain:

4. Are you currently:

   ☐ A pretrial detainee (waiting for trial on criminal charges)

   ☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime

   If you are currently serving a sentence, provide:

   (a) Name and location of court that sentenced you: N/A

   (b) Docket number of criminal case: N/A

   (c) Date of sentencing: N/A

   ☒ Being held on an immigration charge

   ☐ Other *(explain)*:

Decision or Action You Are Challenging

5. What are you challenging in this petition:

   ☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
☐ Disciplinary proceedings
☐ Other *(explain)*:

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: U.S. Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations, San Antonio Field Office; Dilley Immigration Processing Center, Dilley, Texas

(b) Docket number, case number, or opinion number: A#[redacted]

(c) Decision or action you are challenging *(for disciplinary proceedings, specify the penalties imposed)*:
Petitioner's continued civil immigration detention since July 7, 2026, without any bond hearing or individualized custody determination, and her transfer from Florida to Texas after she had filed a habeas petition in the Middle District of Florida (Case No. 3:26-cv-01874).

(d) Date of the decision or action: July 7, 2026 (taken into ICE custody); detention continuing

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☐ Yes ☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: N/A

(2) Date of filing:

(3) Docket number, case number, or opinion number:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not appeal:
There is no custody decision to appeal: Respondents never issued a written custody determination and no immigration judge ever held a bond hearing, although her attorney requested one.

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☐ Yes ☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: N/A

(2) Date of filing:

(3) Docket number, case number, or opinion number:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not file a second appeal:

See answer to Question 7(b).

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☐ Yes ☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: N/A

(2) Date of filing:

(3) Docket number, case number, or opinion number:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not file a third appeal:

See answer to Question 7(b).

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes ☒ No

If "Yes," answer the following: N/A – Petitioner has never been convicted of any crime.

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☐ Yes ☐ No N/A

If "Yes," provide:

(1) Name of court: N/A

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

❒ Yes ❒ No N/A

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: N/A

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☒ Yes ❒ No

If "Yes," provide:

(a) Date you were taken into immigration custody: July 7, 2026

(b) Date of the removal or reinstatement order: IJ denial on or about 09/19/2025 – not final (BIA appeal pending)

(c) Did you file an appeal with the Board of Immigration Appeals?

☒ Yes ❒ No

If "Yes," provide:

(1) Date of filing: October 16, 2025 (BIA Filing Receipt dated October 17, 2025)

(2) Case number: A# 220-656-508

(3) Result: Pending – no decision has been issued

(4) Date of result: N/A (appeal pending)

(5) Issues raised: Appeal of the Immigration Judge's denial of Petitioner's Form I-589 application for asylum, withholding of removal, and protection under the Convention Against Torture.

(d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes ☒ No

If "Yes," provide:

(1) Name of court: N/A – the Board of Immigration Appeals has not decided the appeal.

(2) Date of filing:

(3) Case number:

(4) Result:

(5) Date of result:

(6) Issues raised:

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☒ Yes ☐ No

If "Yes," provide:

(a) Kind of petition, motion, or application: Petition for Writ of Habeas Corpus (28 U.S.C. § 2241) and Motion for TRO

(b) Name of the authority, agency, or court: U.S. District Court, Middle District of Florida, Jacksonville Division

(c) Date of filing: July 23, 2026

(d) Docket number, case number, or opinion number: 3:26-cv-01874-MMH-PDB

(e) Result: Pending; reassigned 08/01/2026; Doc. 4 "Change Venue / Transfer Case" entered 08/24/2026

(f) Date of result: No final result

(g) Issues raised: Unlawful immigration detention without a bond hearing or individualized custody determination; request for release or a custody hearing and for orders barring removal and further transfer.

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: Detention for a prolonged period without any individualized custody hearing violates the Due Process Clause of the Fifth Amendment.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*: Petitioner has been held in ICE custody continuously since July 7, 2026. She has never received a bond hearing, and no immigration judge or other neutral decisionmaker has ever reviewed whether her detention is justified. Her appeal has been pending before the Board of Immigration Appeals since October 16, 2025 without a decision, so her detention has no foreseeable end. She has no criminal record anywhere, has attended every immigration court hearing since 2021, holds a valid Employment Authorization Document, has worked and paid taxes, and is the sole caregiver of her eight-year-old son.

(b) Did you present Ground One in all appeals that were available to you?

☐ Yes ☒ No

GROUND TWO: Respondents have never identified in writing the legal basis for Petitioner's detention, and the record of her 2021 encounter with immigration officers has never been produced.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*: Petitioner has never been served with a written custody determination stating the legal provision under which she is detained. On September 13, 2021, near Eagle Pass, Texas, she approached U.S. immigration officers with her three-year-old son, identified herself, and asked for protection. She was processed and released the next day with a Notice to Appear. The records of that encounter (Form I-213, Form I-862, any Form I-94, and any parole, release, or supervision document) are in Respondents' possession and have never been provided to her.

(b) Did you present Ground Two in all appeals that were available to you?

☐ Yes ☒ No

GROUND THREE: Petitioner was taken into custody because she came forward to the police as the victim of a crime.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*: On July 7, 2026, Petitioner went alone and voluntarily to the Bradenton Police Department in Bradenton, Florida, to report that her former partner had been threatening and harassing her and had damaged her car. Officers asked for her identification, checked her immigration information, and she was placed in immigration custody inside the police station. No criminal charge was filed against her.

(b) Did you present Ground Three in all appeals that were available to you?

☐ Yes ☒ No

GROUND FOUR: Petitioner was transferred out of the district where she had filed a habeas petition, after that court's jurisdiction had attached, and she has been unable to receive that court's mail since.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*: On July 23, 2026, while held at the Flagler County Jail in Bunnell, Florida, Petitioner filed a habeas petition and a motion for temporary restraining order in the U.S. District Court for the Middle District of Florida (Case No. 3:26-cv-01874). After that filing, and without notice to her or to that court, Respondents moved her approximately 1,200 miles to the Dilley Immigration Processing Center in Texas. That court's notices are still addressed to the Flagler County Jail, so she cannot receive its orders or learn of any deadlines. She has no ties to Texas.

(b) Did you present Ground Four in all appeals that were available to you?

☐ Yes ☒ No

GROUND FIVE: See Attachment A (continuation of Question 13).

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: No administrative appeal was available for any of these grounds. Respondents never issued a written custody determination and no bond hearing was ever held, so there was no custody decision to appeal. The appeal pending before the Board of Immigration Appeals concerns only the merits of Petitioner's asylum application, not her detention. The immigration agencies cannot decide constitutional challenges to detention, and Grounds Three and Four arose after the Board appeal was filed.

Request for Relief

15. State exactly what you want the court to do:

(a) Order Respondents to show cause and to file, within 72 hours, a sworn response stating the legal basis for Petitioner's detention and the date of and reasons for her transfer to this District, and producing the record of her September 2021 encounter with immigration officers.

(b) Order that Petitioner not be removed from the United States while this action is pending.

(c) Order that Petitioner not be transferred outside this District without 72 hours' written notice to the Court and to Petitioner.

(d) Hold Ground One in abeyance pending the en banc decision of the Fifth Circuit on whether prolonged detention requires an individualized custody hearing, or resolve it consistently with that decision.

(e) Order Petitioner released on reasonable conditions of supervision, or order an individualized custody hearing, to the extent the law permits.

(f) If the Court concludes that the Middle District of Florida retains jurisdiction, transfer this action to that court or stay it, rather than dismiss it.

(g) Grant any other relief that is just and proper.

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 09/14/2026

Arianny Villalobos

Signature of Petitioner

Arianny Carolina Villalobos Chaparro, pro se, A# [redacted]
Dilley Immigration Processing Center, 300 El Rancho Way, Dilley, TX 78017

Signature of Attorney or other authorized person, if any

ATTACHMENT A – CONTINUATION OF QUESTION 13

Petitioner: Arianny Carolina Villalobos Chaparro, A# [redacted]

GROUND FIVE: Petitioner's detention is governed by the discretionary detention statute and she is entitled to a custody redetermination (bond) hearing. This ground is raised for preservation.

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

Petitioner has been in the United States since September 2021, was arrested in the interior of the country (Bradenton, Florida) nearly five years after her arrival, and was never charged under any mandatory-detention provision. Her detention should be treated as discretionary, which would entitle her to a custody redetermination (bond) hearing before an immigration judge. Petitioner acknowledges that current Fifth Circuit precedent is contrary and raises this ground to preserve it for further review.

(b) Did you present Ground Five in all appeals that were available to you?

☐ Yes ☒ No

See answer to Question 14.

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Instructions

1. **Who Should Use This Form.** You should use this form if
   - you are a federal prisoner and you wish to challenge the way your sentence is being carried out *(for example, you claim that the Bureau of Prisons miscalculated your sentence or failed to properly award good time credits)*;
   - you are in federal or state custody because of something other than a judgment of conviction *(for example, you are in pretrial detention or are awaiting extradition)*; or
   - you are alleging that you are illegally detained in immigration custody.

2. **Who Should Not Use This Form.** You should not use this form if
   - you are challenging the validity of a federal judgment of conviction and sentence *(these challenges are generally raised in a motion under 28 U.S.C. § 2255)*;
   - you are challenging the validity of a state judgment of conviction and sentence *(these challenges are generally raised in a petition under 28 U.S.C. § 2254)*; or
   - you are challenging a final order of removal in an immigration case *(these challenges are generally raised in a petition for review directly with a United States Court of Appeals)*.

3. **Preparing the Petition.** The petition must be typed or neatly written, and you must sign and date it under penalty of perjury. **A false statement may lead to prosecution.**

4. **Answer all the questions.** You do not need to cite law. You may submit additional pages if necessary. If you do not fill out the form properly, you will be asked to submit additional or correct information. If you want to submit any legal arguments, you must submit them in a separate memorandum. Be aware that any such memorandum may be subject to page limits set forth in the local rules of the court where you file this petition. If you attach additional pages, number the pages and identify which section of the petition is being continued. All filings must be submitted on paper sized 8½ by 11 inches. **Do not use the back of any page.**

5. **Supporting Documents.** In addition to your petition, you must send to the court a copy of the decisions you are challenging and a copy of any briefs or administrative remedy forms filed in your case.

6. **Required Filing Fee.** You must include the $5 filing fee required by 28 U.S.C. § 1914(a). If you are unable to pay the filing fee, you must ask the court for permission to proceed in forma pauperis – that is, as a person who cannot pay the filing fee – by submitting the documents that the court requires.

7. **Submitting Documents to the Court.** Mail your petition and ___ copies to the clerk of the United States District Court for the district and division in which you are confined. For a list of districts and divisions, see 28 U.S.C. §§ 81-131. All copies must be identical to the original. Copies may be legibly handwritten.

   If you want a file-stamped copy of the petition, you must enclose an additional copy of the petition and ask the court to file-stamp it and return it to you.

8. **Change of Address.** You must immediately notify the court in writing of any change of address. If you do not, the court may dismiss your case.

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

ARIANNY CAROLINA VILLALOBOS CHAPARRO, A#[redacted]
Petitioner,

v.

FILED
SEP 23 2026
CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY _____
DEPUTY CLERK

WARDEN/ FACILITY ADMINISTRATOR, DILLEY IMMIGRATION PROCESSING CENTER;
FIELD OFFICE DIRECTOR, ICE ERO, SAN ANTONIO FIELD OFFICE;
ACTING DIRECTOR, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE);
MARKWAYNE MULLIN, Secretary of Homeland Security; ATTORNEY GENERAL OF THE UNITED STATES,
Respondents.

SA26CV6102XR

Case No. _____

PROTECTIVE PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241

I. NATURE OF THIS PETITION AND FULL DISCLOSURE OF A PENDING ACTION

1. Petitioner discloses at the outset, and before anything else, that she already has a habeas corpus petition pending in another federal district court.

2. On July 23, 2026, while confined at the Flagler County Jail in Bunnell, Florida, Petitioner filed a petition for writ of habeas corpus under 28 U.S.C. § 2241 in the United States District Court for the Middle District of Florida, Jacksonville Division, in the case captioned Villalobos Chaparro v. Warden, Flagler County Jail, et al., Case No. 3:26-cv-01874-MMH-PDB. That same

day she also filed a Motion for Temporary Restraining Order. The $5.00 filing fee was paid, receipt number 39225. See Exhibit 2.

3. That case remains pending. No ruling has issued on the merits or on the temporary restraining order. The only docket activity since filing is a reassignment io Magistrate Judge Patricia D. Barksdale, entered on August 1, 2026. See Exhibit 3.

4. After Petitioner filed that case, and without notice to her or to that comi, Respondents transferred her out of the Middle District of Florida and out of the state of Florida to the Dilley Immigration Processing Center in Dilley, Texas, located in Frio County, within this District and this Division. As of August 30, 2026, the ICE Online Detainee Locator System lists her at that facility. See Exhibit 1.

5. Petitioner files this petition protectively, and she is candid about why. Her immediate physical custodian is now within this District. She does not know whether Respondents will contest the Middle District of Florida's continuing jurisdiction, and she cannot afford to learn later, when it is too late, that she has no forum at all. She is detained, indigent, and unrepresented in these habeas proceedings.

6. Petitioner does not seek duplicative relief and is not asking two cou1 1s to order the same thing. She asks this Court to take one of the following paths:

(a)If this Court concludes that the Middle District of Florida retains jurisdiction, Petitioner asks that this Cou1 1 TRANSFER this action to that cotut under 28 U.S.C. § 1404(a) or§ 1406(a), so that it may be consolidated with the pending case, or that it STAY this action while that case is resolved there - rather than dismiss it. A dismissal, followed by an adverse jurisdictional ruling in Florida, would leave her with nothing.

(b) If this Cou1 1 concludes that jurisdiction lies here because her immediate custodian is here, Petitioner asks that the Court reach the grounds set out below.

7. Petitioner undertakes to notify both courts in writing and without delay of any ruling issued in

either action, and of any ti.trther change in her place of confinement.

8. Petitioner is simultaneously filing a Notice of Pending Related Action in this Court and in the M iddlc District of Florida.

11. JURISDICTION AND VENUE

9. This Court has jurisdiction under28 U.S.C. § 2241 and 28 U.S.C. § 1331.

10. Petitioner's immediate custodian is the Warden / Facility Administrator of the Dilley Immigration Processing Center, located at 300 El Rancho Way, Dilley, Texas 78017, Frio County, within the San Antonio Division of this District. Rumsfcld v. Padilla, 542 U.S. 426, 435 (2004).

11. Venue is proper under 28 U.S.C. § 139l(e) and§ 2241.

12. Petitioner challenges only the lawfulness of her pre-final-order detention. She does not seek review of any removal order, and no removal order is administratively final: her appeal has been pending before the Board of Immigration Appeals since October 16, 2025. Accordingly, 8

U.S.C. §§ 1252(a)(2), 1252(b)(9), and 1252(g) do not strip this Court of jurisdiction. See Reno v. American Arab Anti-Discrimination Committee, 525 U.S. 471,482 (1999).

Ill. PARTIES

13. Petitioner is a citizen and national of Venezuela, age 35, born on [redacted] 1990 in [redacted]. She is detained at the Dilley Immigration Processing Center.

14. Respondents are sued in their official capacities only: the Warden/ Facility Administrator of the Dilley Immigration Processing Center, as Petitioner's immediate custodian; the Field Office Director, ICE Enforcement and Removal Operations, San Antonio Field Office; the Acting Director of U.S. Immigration and Customs Enforcement; Markwayne Mullin, Secretary of Homeland Security; and the Attorney General of the United States.

IV. STATEMENT OF FACTS

15. On September 13, 2021, Petitioner arrived at or near Eagle Pass, Texas, carrying her three-year-old son. She did not evade detection. She presented herself directly and voluntarily to United States immigration officers and asked for protection.

16. Petitioner and her son were taken into custody, processed, and released the following day, September 14, 2021. DHS issued a Notice to Appear placing her in removal proceedings under 8
U.S.C. § 1229a, charging her as inadmissible under 8 U.S.C. § I 182(a)(6)(A)(i).

17. Petitionerhasneverbeenchargedunder8 U.S.C. § 1226(c), § 1225(b)(1),or§ 1231.

18. From September 2021 until her arrest. Petitioner *lived* openly in Florida for approximately five years, most recently in Lakewood Ranch and in Bradenton. See Exhibits 4 and 22.

19. Petitioner appeared at every immigration court hearing. She filed Fann 1-589, an application for asylum, withholding of removal, and protection under the Convention Against Torture. It was denied, and on October 16, 2025 she timely appealed to the Board of Immigration Appeals, paying the $1,0 I 0.00 fee. The Board acknowledged receipt by a Filing Receipt dated October 17, 2025. That appeal has now been pending for more than ten months without a decision. See Exhibits 5, 6, and 7.

20. Petitioner holds a valid Employment Authorization Document. She has worked lawfully and has paid taxes. See Exhibits 8, 9, and 10.

21. Petitioner has no criminal record of any kind. She has never been arrested, charged, or convicted of any offense in any country.

22. Petitioner is a licensed dentist (Universidad de! Zulia, 2012, credential evaluated by Educational Credential Evaluators) and a Registered Dental Assistant in Florida. Her licensing examination was scheduled for July I 0, 2026; she was unable to sit for it because she was detained three days earlier. See Exhibits 11 through 16.

23. On orabout July 7, 2026, Petitioner went to the Bradenton Police Department in Bradenton, Florida, on her own initiative, to report that her former romantic partner had been threatening and harassing her and had vandalized her vehicle. She went to seek the protection of the police as the victim ofa crime.

24. At the police station, officers checked her immigration information and she was taken into immigration custody. No criminal charge was filed against her.

25. Petitioner has been in ICE custody continuously since July 7, 2026 - approximately eight weeks as of the date of this filing. She has never received a bond hearing. No immigration judge has made any individualized determination regarding her custody.

26. Petitioner is the sole caregiver and single mother of [redacted] born [redacted], age eight, who holds Temporary Protected Status and has been diagnosed with Attention-Deficit/Hyperactivity Disorder. He 1s m the care of a relative and has been separated from her since July 7, 2026. See Exhibits 17 through 20.

27. Petitioners have no connection of any kind to Texas.

V. GROUNDS FOR RELIEF

Petitioner states at the outset that she is aware of.' and does not ask this Court to disregard, the binding decision of this Circuit's Court of Appeals in Buenrostro-Mendez v. Bondi. 166 F.4th 494 (5th Cir. Feb. 6, 2026), which held that persons who entered without inspection remain applicants for admission subject to 8 U.S.C. § I 225(b)(2)(A). The grounds that follow are framed with that decision in mind.

GROUND ONE - Detention for a prolonged period without any individualized custody hearing violates the Due Process Clause of the Fifth Amendment.

28.Buenrostro-Mendez resolved a question of statutory construction. It did not hold that the Constitution pe1mits detention of indefinite duration without any individt/alized hearing.

29.That constitutional question is cun-ently before this Circuit's Court of Appeals sitting en bane. A panel held on July 2, 2026, in Sosnava-Rodriguez v. Ortega, that persons detained under § I225(b)(2) are entitled, as a matter of due process, to an individualized custody hearing within ninety days, at which the Government bears the burden of justifying continued detention. On July 14, 2026, the foll court granted rehearing en bane, which, under this Circuit's practice, vacated the panel's decision, and on July 21, 2026 it stayed the underlying district court judgments. Briefing was to be completed and argument held in September 2026.

30.Petitioner's claim falls squarely within the question the en bane court will decide. She has been detained since July 7, 2026 without any hearing.

31.Even setting the en bane proceeding aside, the Supreme Court has upheld mandato1·y immigration detention on the understanding that it lasts only the brief period necessary to complete removal proceedings. Demore v. Kim, 538 U.S. 510, 513, 529-31 (2003). Freedom from physical restraint by the Government lies at the very heart of the liberty protected by the Due Process Clause, and a statute must be construed, wherever possible, so as to avoid indefinite detention. Zadvydas v. Davis, 533 U.S. 678,690,699 (2001).

32. Petitioner's detention is not brief and has no identifiable end point. Her appeal has been pending before the Board of Immigration Appeals since October 16, 2025 without any decision, and she has no control over when the Board will act.

33. Petitioner respectfolly. asks this Court to hold this ground in abeyance pending the en bane decision. or to resolve it consistently with that decision when it issues, and in the meantime to preserve the status quo.

GROUND TWO - Respondents have never identified to Petitioner in writing the legal basis for her detention, and the record or her 2021 encounter with immigration officers has never been produced.

34. Petitioner has not been given a written custody determination identifying the statute under

which she is being held. On information and belief, Respondents rely on 8 U.S.C. § 1225(b)(2)(A), but Petitioner has never been served with a Form I-286 or equivalent document so stating.

35. The characterization of Petitioner's 2021 arrival is a factual question that has never been developed. She did not evade inspection. She approached United States immigration officers, identified herself, handed over her child, and asked for protection. She was taken into custody, processed, and released the following day.

36. The documents generated by that encounter -including any Form 1-2 I 3 (Record of Deportablc/Inadmissible Alien), the Form 1-862 (Notice to Appear), any Form 1-94, and any document reflecting parole, release on recognizance, or an order of supervision- arc in Respondents' possession and have never been provided to Petitioner.

37. Whether Petitioner is properly characterized as an applicant for admission, and under which subsection she is detained, cannot be resolved on the present record. Petitioner asks the Comito order Respondents to produce that record and to state, under oath, the legal basis for her custody

GROUND THREE - Petitioner was taken into custody because she came forward to the police as the victim of a crime.

38. This ground does not depend on the statutory question decided in Buenrostro-Mendez. Petitioner was not arrested at a workplace, at a traffic stop, or at an immigration check-in appointment. She was arrested inside a police station she had walked into voluntarily. alone. to report that she was being threatened and that her property had been destroyed.

39. To detain a person because she sought the protection of the police, and then to hold her for weeks without any hearing, is arbitrary. It also deters other victims from reporting crimes, which serves no legitimate governmental interest.

40. Petitioner requests that Respondents be required to state what immigration enforcement action, if any, was pending against her before she walked into the police station on July 7, 2026.

GROUND FOUR - Petitioner was transferred out of the district where she had filed a habeas petition, after that court's jurisdiction had already attached, and she has been unable to receive that court's mail since.

41. Petitioner filed her petition in the Middle District of Florida on July 23, 2026. Respondents transferred her approximately 1,200 miles after that filing, without notice to her or to that court.

42. Because that court's notices arc still addressed to the Flagler County Jail, Petitioner has been unable to receive its orders since the transfer. She has no way of knowing whether any deadline has already passed.

43. Petitioner does not ask this Court to find improper motive. She asks that Respondents be required to state on the record the date of the transfer and the reasons for it, and that no further transfer occur without notice to the Court.

GROUND FIVE - Petitioner's detention is governed by 8 U.S.C. § 1226(a) and she is entitled to a custody redetermination hearing. This ground is raised for preservation.

44. Petitioner acknowledges that Buenrostro-Mendez is binding on this Court and rests this ground here. She raises it solely to preserve it for later review.

45. Petitioner notes that the Courts of Appeals are divided. The Second, Sixth, Seventh, and Eleventh Circuits have held that§ 1225(b)(2)(A) does not reach persons an-ested in the interior of the country. See, e.g., Hernandez Alvarez v. Warden, Federal Detention Center Miami, No. 25-14065 (I I th Cir. May 6, 2026). The Fifth Circuit has held otherwise. Petitioner preserves the question.

VI. PRAYER FOR RELIEF

46. Petitioner respectfully requests that this Court:

(a) Issue an order to show cause requiring Respondents to file a sworn response within

seventy-two hours stating-the legal basis for Petitioner's detention, the date of and reasons for her transfer to this District, and producing the record of her September 2021 encounter with immigration officers;

(b) Enjoin Respondents from removing Petitioner from the United States while this action is pending;

(c) Enjoin Respondents from transferring Petitioner to any facility outside this District without seventy-two hours' written notice to this Court and to Petitioner;

(d) Hold Ground One in abeyance pending the en bane decision in Sosnava-Rodriguez v. Ortega, or resolve it consistently with that decision;

(e) Order Petitioner released on reasonable conditions of supervision, or order an individualized custody hearing, to the extent the law permits (see Exhibit 23, sponsor affidavit);

(f) Alternatively, and only if the Court concludes that the Middle District of Florida retains jurisdiction, TRANSFER this action to that court under 28 U.S.C. § 1404(a) or§ 1406(a), or STAY it, rather than dismiss it; and

(g) Grant such other relief as is just and proper.

Respectfully submitted this 14th day of September 2026.

Arianny Villalobos

Arianny Carola Villalobos Chaparro,
Petitioner, prose A# [redacted]
Dilley Immigration Processing Center 300 El Rancho Way, Dilley, TX 78017

VERIFICATION

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on September 14, 2026.

Arianny Villalobos

Arianny Carola Villalobos Chaparro,
Petitioner, prose A# [redacted]
Dilley Immigration Processing Center 300 El Rancho Way, Dilley, TX 78017

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

ARIANNY CAROLINA VILLALOBOS CHAPARRO, A# [redacted]
Petitioner,

v.

SA26CV6102XR

WARDEN/ FACILITY ADMINISTRATOR, DILLEY IMMIGRATION PROCESSING CENTER;
FIELD OFFICE DIRECTOR, ICE ERO, SAN ANTONIO FIELD OFFICE;
ACTING DIRECTOR, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE);
MAR KWAYNE MULLIN, Secretary of Homeland Security;
ATTORNEY GENERAL OF THE UNITED STATES,
Respondents.

Case No._____

CERTIFICATE OF SERVICE

I certify that on September 12, 2026, I placed a true and correct copy of the foregoing in this facility's legal mail system, with first-class postage prepaid, addressed to:

I. Civil Process Clerk, Office of the United States Attorney for the Western District of Texas, 601 N.W. Loop 410, Suite 600, San Antonio, TX 78216-5597.

2. Attorney General of the United States, U.S. Department of Justice, 950 Pennsylvania Avenue NW, Washington, DC 20530-0001.

3. Secretary of Homeland Security, Office of the General Counsel, Mail Stop 0485, 2707 Martin Luther King Jr. Avenue SE, Washington, DC 20528-0485.

4. Acting Director, U.S. Immigration and Customs Enforcement, 500 12th Street SW, Washington, DC 20536.

5. Warden/ Facility Administrator, Dilley Immigration Processing Center, 300 El Rancho Way, Dilley, TX 78017.

6. Field Office Director, ICE ERO San Antonio Field Office, 1777 NE Loop 410, Suite 1500, San Antonio, TX 78217.

Arianny Villalobos

AriannyCaroma Villalobos Chaparro, Petitioner, pro se
A# [redacted]
Dilley Immigration Processing Center 300 El Rancho Way, Dilley, TX 7801

TABLE DE CONTENIDO

SA26CV6102XR

DOCUMENT	DESCRIPTION	PAGES
PART II — EXHIBITS		
Exhibit 1	ICE Online Detainee Locator System search result reflecting Petitioner in ICE custody at the Dilley Immigration Processing Center, Dilley, Texas (August 30, 2026)	23 – 24
Exhibit 2	Civil Docket Report, U.S. District Court, Middle District of Florida, Villalobos Chaparro v. Warden, Flagler County Jail, et al., Case No. 3:26-cv-01874 (Petition and Motion for TRO filed July 23, 2026)	25 – 26
Exhibit 3	Notice of Electronic Filing, U.S. District Court, Middle District of Florida, Case No. 3:26-cv-01874-MMH-PDB – case reassigned to Magistrate Judge Patricia D. Barksdale (August 1, 2026)	27 – 29
Exhibit 4	Biographic Data of Petitioner	30
Exhibit 5	Biographic Data of Family – Birth Certificate of Petitioner's son, Jose Gerardo Faria Villalobos, with English translation and Certification of Translation Accuracy (LDMA Logistic LLC, September 7, 2026)	31 – 34
Exhibit 5	State Farm billing statement addressed to Petitioner at her residence in Bradenton, Florida (May 2, 2026)	35 – 36
Exhibit 6	Board of Immigration Appeals Filing Receipt for Appeal or Motion – appeal received October 16, 2025 (Notice dated October 17, 2025)	37 – 40
Exhibit 7	Executive Office for Immigration Review Payment Receipt – BIA Appeal (Form EOIR-26), A# 220-656-508, $1,010.00	41 – 42
Exhibit 8	Orlando Immigration Court transmittal forwarding the Record of Proceeding to the Board of Immigration Appeals (October 21, 2025)	43 – 44
Exhibit 9	Forms W-2, Wage and Tax Statements – Parkview Dental Partners LLC (2025) and Heartland Dental, LLC (2024)	45 – 47
Exhibit 10	Form 1099-NEC, Nonemployee Compensation – Tempmee Hygienists Inc. (2024)	48 – 49
Exhibit 11	Employer letter – Magnolia Green Dental Care, Sarasota, Florida (July 2026)	50 – 51
Exhibit 12	Diploma and Professional Title of Odontóloga (Dentist), Universidad del Zulia, Maracaibo, Venezuela (December 2012), with certified English translation	52 – 54
Exhibit 13	Course-by-Course Evaluation Report, Educational Credential Evaluators (ECE), Reference J12725 (July 9, 2024)	55 – 58
Exhibit 14	Certificate of Registration as Registered Dental Assistant (RDA), Florida Registry of Dental Assistants (September 16, 2024)	59 – 60

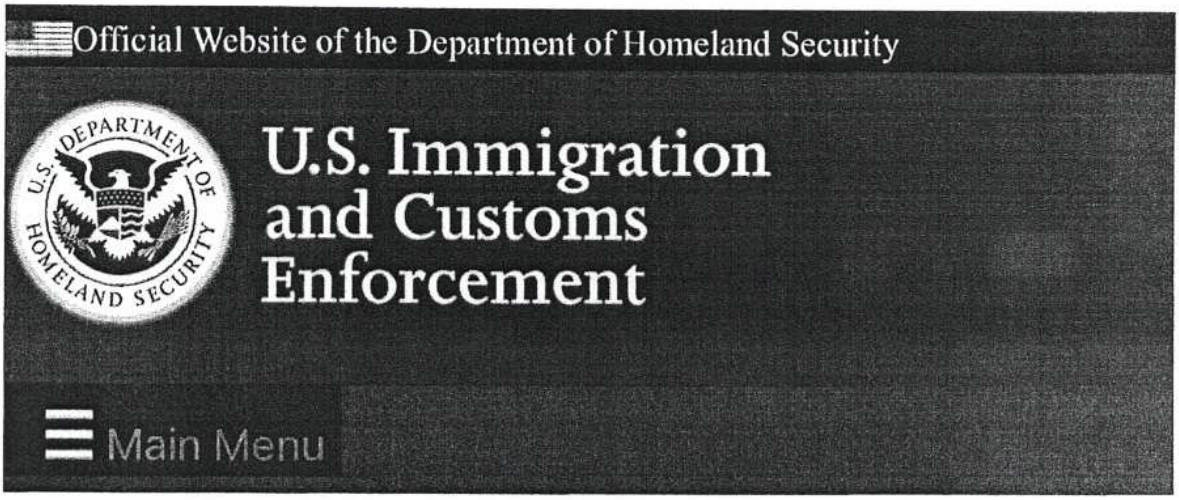
Exhibit 15	Form I-797C, Notice of Action – Approval of Temporary Protected Status for Jose Gerardo Faria Villalobos, A# 220-656-509, and related USCIS notice (February 15, 2024)	61 – 64
Exhibit 16	Declaration of Arianny Carolina Villalobos Chaparro submitted in support of Form I-589 before the Orlando Immigration Court, in Spanish with certified English translation	65 – 79
Exhibit 17	Letters of support from employers, co-workers, Bayside Community Church, Premier Martial Arts, and community members	80 – 94
Exhibit 18	Sworn affidavit of U.S. citizen sponsor Bonnie Francis, CRDH (July 27, 2026)	95 – 96
Exhibit 19	ICE Online Detainee Locator System search result – Dilley Immigration Processing Center	97 – 98

EXHIBIT 1

ICE ONLINE DETAINEE LOCATOR SYSTEM SEARCH RESULT REFLECTING PETITIONER IN ICE CUSTODY AT THE DILLEY IMMIGRATION PROCESSING CENTER, TEXAS (CAPTURED AUGUST 30, 2026)

VILLALOBOS CHAPARRO V. WARDEN, DILLEY IMMIGRATION PROCESSING CENTER, ET AL.

9:39



Resultados de Búsqueda: 1

ARIANNY CAROLINA VILLALOBOS-CHAPARRO

Pais de Nacimiento : Venezuela

Número A: [redacted]

Estatus : Bajo custodia del ICE

Estado: TX

Centro de Detención Actual: DILLEY IMMIGRATION PROCESSING CENTER

**Haga clic en el nombre del Centro de Detención para obtener información de contacto.*

EXHIBIT 2

Civil Docket Report, U.S. District Court, Middle District of Florida (Jacksonville), Villalobos Chaparro v. Warden, Flagler County Jail, et al., Case No. 3:26-cv-01874, reflecting the Petition and Motion for Temporary Restraining Order filed July 23, 2026 (filing fee receipt no. 39225)

Villalobos Chaparro v. Warden, Dilley Immigration Processing Center, et al.

HABEAS

U.S. District Court
Middle District of Florida (Jacksonville)
CIVIL DOCKET FOR CASE #: 3:26-cv-01874-MMH-MCR

Villalobos Chaparro v. Warden, Flagler County Jail et al (Flagler)
Assigned to: Judge Marcia Morales Howard
Referred to: Magistrate Judge Monte C. Richardson
Cause: 28:2241 Petition for Writ of Habeas Corpus (Federal)

Date Filed: 07/23/2026
Jury Demand: None
Nature of Suit: 463 Habeas Corpus - Alien Detainee
Jurisdiction: U.S. Government Defendant

Petitioner

Arianny Carolina Villalobos Chaparro

represented by **Arianny Carolina Villalobos Chaparro**
A[redacted]
Flagler County Jail
1002 Justice Lane
Bunnel, FL 32210
PRO SE

V.

Respondent

Warden, Flagler County Jail

Respondent

U.S. Attorney General

Date Filed	#	Docket Text
07/23/2026	1	PETITION for Writ of Habeas Corpus - Federal (Filing fee $ 5, receipt number 39225) filed by Arianny Carolina Villalobos Chaparro. (Attachments: # 1 Attachment 1, # 2 Table of Contents, # 3 Tabs 1 - 10, # 4 Declaration in Support, # 5 Mailing Envelope)(BD) (Entered: 07/23/2026)
07/23/2026	2	MOTION for Temporary Restraining Order by Arianny Carolina Villalobos Chaparro. (Chambers notified) (BD) (Entered: 07/23/2026)

PACER Service Center
Transaction Receipt
07/27/2026 18:10:49

PACER Login:	[redacted]	Client Code:	
Description:	Docket Report	Search Criteria:	3:26-cv-01874-MMH-MCR

EXHIBIT 3

Notice of Electronic Filing, U.S. District Court, Middle District of Florida, Case No. 3:26-cv-01874-MMH-PDB – case reassigned to Magistrate Judge Patricia D. Barksdale (entered August 1, 2026)

Villalobos Chaparro v. Warden, Dilley Immigration Processing Center, et al.

MIME-Version:1.0
From:cmecf_flmd_notification@flmd.uscourts.gov
To:cmecf_flmd_notices@localhost.localdomain
Bcc:
--Case Participants:
--Non Case Participants:
--No Notice Sent:

Message-Id:<27565492@flmd.uscourts.gov>
Subject:Activity in Case 3:26-cv-01874-MMH-PDB Villalobos Chaparro v. Warden, Flagler County Jail et al (Flagler) Case Assigned/Reassigned
Content-Type: text/plain
This is an automatic e-mail message generated by the CM/ECF system.
Please DO NOT RESPOND to this e-mail because the mail box is unattended.
NOTE TO PUBLIC ACCESS USERS Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30 page limit do not apply.

U.S. District Court
Middle District of Florida

Notice of Electronic Filing
The following transaction was entered on 8/1/2026 1:34 AM EDT and filed on 8/1/2026

Case Name: Villalobos Chaparro v. Warden, Flagler County Jail et al (Flagler)

Case Number: 3:26-cv-01874-MMH-PDB
https://ecf.flmd.uscourts.gov/cgi-bin/DktRpt.pl?463490

Filer:

Document Number: 3

Copy the URL address from the line below into the location bar of your Web browser to view the document:
3(No document attached)

Docket Text:
Case Reassigned to Magistrate Judge Patricia D. Barksdale. New case number: 3:26-cv-01874-MMH-PDB. Magistrate Judge Monte C. Richardson no longer assigned to the case. (FLMD_CMECF_SVC01,)

3:26-cv-01874-MMH-PDB Notice has been electronically mailed to:

3:26-cv-01874-MMH-PDB Notice has been delivered by other means to:
[redacted] Carolina Villalobos Chaparro

Flagler County Jail
1002 Justice Lane
Bunnel, FL 32210

Case: 3:26-cv-01874-MMH-PDB

Arianny Carolina Villalobos Chaparro [redacted]
Flagler County Jail
1002 Justice Lane
Bunnel, FL 32210

EXHIBIT 6

Board of Immigration Appeals Filing Receipt for Appeal or Motion, acknowledging receipt of Petitioner's appeal on October 16, 2025 (Date of Notice: October 17, 2025)

Villalobos Chaparro v. Warden, Dilley Immigration Processing Center, et al.

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
BOARD OF IMMIGRATION APPEALS

Diaz, Edward
Nuevos Diaz Law, LLC
1743 W 6200 S
Suite. 4
Taylorsville, UT 84129

DHS/ICE Office of Chief Counsel - ORL
500 NORTH ORANGE AVENUE,
SUITE 500
Orlando, FL 32801

Name:
VILLALOBOS-CHAPARRO, ARIANNY CAROLINA [redacted]

Riders:

Date of Notice: 10/17/2025

FILING RECEIPT FOR APPEAL OR MOTION

The Board of Immigration Appeals (Board or BIA) acknowledges receipt of the appeal or motion and fee or fee waiver request (where applicable) on 10/16/2025 , in the above-referenced case, filed by the Respondent

Additional Comments
N/A

WARNING FOR APPEALS:

Departure. If you leave the United States after filing this appeal but before the Board issues a decision, your appeal may be considered withdrawn and the Immigration Judge's decision will become final as if no appeal had been taken (unless you are an "arriving alien" as defined in the regulations under 8 C.F.R. § 1001.1(q)).

Proof of posting voluntary departure bond. If you have been granted voluntary departure by the Immigration Judge, you must submit proof of having posted the voluntary departure bond set by the Immigration Judge to the Board. Your submission of proof must be provided to the Board within 30 days of filing this appeal. If you do not timely submit proof to the Board that the voluntary departure bond has been posted, the Board cannot reinstate the period of voluntary departure. 8 C.F.R. § 1240.2(c)(3)(ii).

Autostay Bond Appeals. Please note that the automatic stay will expire 90 days from the date of receipt of the DHS' appeal. 8 C.F.R. § 1003.6(c)(3). If the Board grants the respondent's request for additional briefing time, then the 90-day automatic stay period will be tolled for the same number of days. 8 C.F.R. § 1003.6(c)(4).

Form EOIR-27. If the appeal was filed by DHS and the respondent/applicant wishes to be represented by an attorney or accredited representative in these new proceedings, counsel must complete a new Form EOIR-27 (Notice of Entry of Appearance as Attorney or Representative before the Board of Immigration Appeals). Unless a Form EOIR-27 is received from counsel, the respondent/applicant will be considered pro se before the Board and all future notices, including the Board's decision, will be sent directly to the respondent/applicant and not to counsel.

WARNING FOR MOTIONS:

Stay of removal. Filing a motion with the Board does not automatically stop the DHS from executing an order of removal. If the respondent/applicant is in DHS detention and is about to be removed, you may request the Board to stay the removal on an emergency basis. For more information, call the Clerk's Office at (703) 605-1007.

Form EOIR-27. If the motion was filed by DHS and the respondent/applicant wishes to be represented by an attorney or accredited representative in these new proceedings, counsel must complete a new Form EOIR-27 (Notice of Entry of Appearance as Attorney or Representative before the Board of Immigration Appeals). Unless a Form EOIR-27 is received from counsel, the respondent/applicant will be considered pro se before the Board and all future notices, including the Board's decision, will be sent directly to the respondent/applicant and not to counsel.

FILING INSTRUCTIONS:

If you have any questions about how to file something at the Board, please review the Board's Practice Manual which is available on EOIR's website at www.justice.gov/eoir.

Accepted by: WilsonD

CC

EXHIBIT 7

Executive Office for Immigration Review Payment Receipt – BIA Appeal (Form EOIR-26), A# [redacted], $1,010.00

Villalobos Chaparro v. Warden, Dilley Immigration Processing Center, et al.

Filed at BIA on: 10/16/2025 at 08:16:25 PM (Eastern Daylight Time)

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: 10/14/2025 4:42:09 PM EST

Filing Type: BIA - Appeal (new filing of a Form EOIR-26)

Payment Type: PLASTIC_CARD

Payment Amount: $1,010.00

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/types-appeals-motions-and-required-fees.

EOIR 1 of 1

EXHIBIT 8

Orlando Immigration Court transmittal forwarding the Record of Proceeding to the Board of Immigration Appeals (October 21, 2025)

Villalobos Chaparro v. Warden, Dilley Immigration Processing Center, et al.

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
Orlando, FL

Oct 21, 2025

A [redacted]
VILLALOBOS-CHAPARRO, ARIANNY CAROLINA

TO: Board of Immigration Appeals
Office of the Clerk
5107 Leesburg Pike, Suite 2000
Falls Church, VA 22041

This Record of Proceeding (ROP) is forwarded to the Board of Immigration Appeals for consideration of the following:

[XX] Appeal of the Immigration Judge decision.
[ ] Appeal of Immigration Judge decision on a motion to reopen.

Please note:

[ ] The respondent / applicant is DETAINED.
[ ] Other _____

[ ] This ROP is for an appeal on a decision entered prior to July 1, 1996.
This ROP is being submitted to APU at the following stage:

[ ] Notice of Appeal filed. Tapes need to be transcribed.
[ ] IJ has signed decision. Briefing schedule needs to be set.
[ ] Motion for Extension of Time to Extend Briefing Schedule has been submitted.
[ ] Briefing Schedule is complete / expired.

PZ

EXHIBIT 11

Employer letter – Magnolia Green Dental Care, Sarasota, Florida (July 2026)

Villalobos Chaparro v. Warden, Dilley Immigration Processing Center, et al.

Magnolia Green Dental Care

July 9, 2026

To The Honorable Judge:

I am writing this letter in strong support of Arianny C. Villalobos-Chaparro who has worked as a dental assistant in our office. As her supervising dentist, I have had the opportunity to work closely with her and observe her professionalism, character, and dedication firsthand.

From the day she joined our practice, she has consistently been one of our most dependable and hardworking employees. She is punctual, honest, compassionate, and takes great pride in caring for our patients. She has become an essential member of our dental team, and her work ethic and commitment have earned the respect of both her coworkers and our patients.

Beyond her work, she is also a devoted single mother raising her seven-year-old son. She works tirelessly to provide him with a stable, loving home and to build a better future for him. Throughout the time I have known her, she has always demonstrated responsibility, integrity, and an unwavering commitment to both her family and her work.

She has made meaningful contributions to our practice and to the people she serves every day. She is someone our patients trust and someone our team depends on. Losing her would not only be a significant loss to our office but would also have a profound impact on her young son, who relies on her as his sole caregiver.

I respectfully ask that you give her case every possible consideration. She is a person of excellent moral character who has worked hard to contribute positively to our community. I sincerely hope she will be given the opportunity to remain with her family and continue the life she has built here.

If you need any additional information, please do not hesitate to contact me.

Respectfully,

Dr. Nick Peracchio, DMD
Dentist
[redacted]

Magnolia Green Dental Care
6975 Professional Parkway East, Suite B
Sarasota FL, 34240
Phone: (941) 349-2750 Fax: (941) 499-8580

EXHIBIT 17

Letters of support from employers, co-workers, Bayside Community Church, and community members

Villalobos Chaparro v. Warden, Dilley Immigration Processing Center, et al.

To The Honorable Judge:

I am writing this letter in strong support of **Arianny C. Villalobos-Chaparro, aka Ari,** who has worked as a dental assistant in our office. As a co-worker, I have had the opportunity to work closely with her and observe her professionalism, character, and dedication firsthand.

I know she has been working diligently on obtaining her dental hygiene license and has consistently demonstrated professionalism and understanding of dental care and the complexities of working with the public as a health care provider. The team are all devastated to hear of her predicament, and we know that she deserves to be treated with dignity and respect as a hard working professional.

Beyond her work, she is also a devoted single mother raising her seven-year-old son. She works tirelessly to provide him with a stable, loving home and to build a better future for him. Throughout the time I have known her, she has always demonstrated responsibility, integrity, and an unwavering commitment to both her family and her work.

She has made meaningful contributions to our practice and to the people she serves every day. She is someone our patients trust and someone our team depends on. Losing her would not only be a significant loss to our office but would also have a profound impact on her young son, who relies on her as his sole caregiver.

I respectfully ask that you give her case every possible consideration. She is a person of excellent moral character who has worked hard to contribute positively to our community. I sincerely hope she will be given the opportunity to remain with her family and continue the life she has built here.

If you need any additional information, please do not hesitate to contact me.

Respectfully,

Bonnie Francis CRDH, MS
Dental Hygienist
Magnolia Green Dental Care
[redacted]

REGENERATIVE
PERIODONTICS & IMPLANTS

11009 Gatewood Drive, Suite 101
Bradenton, FL 34211

Ph: 941-404-3611
Fax: 941-404-3612

07/13/26

Dear Honorable Judge,

I am writing to wholeheartedly support Arianny Carolina Villalobos-Chapparo in her case. I am a Periodontist and have had the privilege of working alongside her for the past 5 years and I can say without hesitation that she is one of the most professional and hard-working individuals I have come across.

Arianny consistently demonstrates outstanding professionalism in everything she does. She is extremely reliable, detail-oriented, and always willing to go the extra mile for both patients and the team. Whether it's managing a busy schedule, assisting with complex procedures, or stepping in to help when things get hectic, she handles every situation with calm competence and a positive attitude. She has become a true asset to our entire team her coworkers regularly rely on her knowledge, support, and teamwork. Many of us have told her directly how much easier and smoother our days are because she is part of the team.

Beyond her strong work ethic, she is also a dedicated single mother to her seven-year-old son. I've seen firsthand how hard she works to be an excellent provider and role model for him while maintaining such high standards at the office. Her ability to balance these responsibilities with such grace and consistency speaks volumes about her character and determination.

Losing Arianny would be a big loss to our practice. She has built strong relationships with patients and staff alike, and her presence makes our team better every single day. More importantly, her young son depends on her completely as his only caregiver. She has worked so hard to create a stable life for them here, and I truly believe she deserves the chance to continue doing so.

I respectfully ask that you give her situation your fullest consideration. She is a person of strong moral character, a true professional, and someone who contributes meaningfully to our office and community. Please feel free to contact me if you need any more information. Thank you for your time and understanding.

Sincerely,

Nathan Estrin

Nathan Estrin DMD, MS
Diplomate of the American Board of Periodontology

To Whom It May Concern,

I am writing to express my strong support for Arianny Carolina Villalobos-Chapparo, who has served as a dental assistant in our practice Magnolia Green Dental Care in Sarasota Florida.

As one of her coworkers, I have had the opportunity to work closely with her and observe her dedication and character first hand.

Since joining our team, Arianny, has proven to be one of our most beloved employees. She is a valuable team member who consistently gives excellent care to our patients.

In addition to her professional commitments, Arianny is an attentive and devoted single mother to her seven-year-old son.

She works tirelessly to create a stable and loving environment and is committed to ensuring a successful future for him.

She has received her immunity status with great respect, responsibility and integrity by furthering her education in dental hygiene to be able to give her son ever opportunity.

She is a trusted figure among our patients, colleagues and a vital support to our team. The loss of her would have a significant impact not only on our office but also on her young son, who depends on her as his primary caregiver.

I urge you to consider her case thoroughly. She is a person of great moral character who has made commendable efforts to positively influence our community. It is my sincere hope that she will be afforded the opportunity to remain with her family and continue the life she has worked so hard to build.

Should you require any further information, please feel free to contact me.

Sincerely,

Laura French, R.D.H.
Magnolia Green Dental Care
[redacted]

July 13, 2026

To Whom It May Concern

I am writing this letter in strong support of Arianny Carolina Villalobos-Chapparo who has worked as a dental assistant in our office. As her supervising manager in this facility, I have had the opportunity to work closely with her and observe her professionalism, character, and dedication firsthand.

From the day she joined our practice, she has consistently been one of our most dependable and hardworking employees. She is punctual, honest, compassionate, and takes great pride in caring for our patients. She has become an essential member of our dental team, and her work ethic and commitment have earned the respect of both her coworkers and our patients.

Beyond her work, she is also a devoted single mother raising her seven-year-old son. She works tirelessly to provide him with a stable, loving home and to build a better future for him. Throughout the time I have known her, she has always demonstrated responsibility, integrity, and an unwavering commitment to both her family and her work.

She has made meaningful contributions to our practice and to the people she serves every day. She is someone our patients trust and someone our team depends on. Losing her would not only be a significant loss to our office but would also have a profound impact on her young son, who relies on her as his sole caregiver.

I respectfully ask that you give her case every possible consideration. She is a person of excellent moral character who has worked hard to contribute positively to our community. I sincerely hope she will be given the opportunity to remain with her family and continue the life she has built here.

If you need any additional information, please do not hesitate to contact me.

Respectfully,

Gina Beechay
Practice Manager
Ryan Taylor & Associates
[redacted]

To The Honorable Judge,

I am writing this letter in strong support of Arianny C. Villalobos-Chaparro, with whom I have had the privilege of working as colleagues in our dental practice. As a dental hygienist, I have worked closely alongside her daily and have had the opportunity to witness her professionalism, compassion, and dedication firsthand.

From the day she joined our office, she has consistently demonstrated an exceptional work ethic and a genuine commitment to providing outstanding patient care. She is dependable, hardworking, punctual, and always willing to help wherever she is needed. She treats every patient with kindness, patience, and respect, helping create a welcoming and comfortable environment for everyone who walks through our doors.

In addition, Ari is a devoted single mother raising her seven-year-old son. She works incredibly hard to provide him with a safe, stable, and loving home while balancing the responsibilities of parenthood and a demanding career.

She has become an invaluable member of our dental team. Her positive attitude, willingness to support her coworkers, and dedication to our patients have earned the trust and respect of everyone in our office. She is someone I know I can always rely on, and her presence has made a meaningful difference in our workplace.

I respectfully ask that you give her case your fullest consideration. She is a person of outstanding moral character who has worked diligently to contribute positively to our community and to provide a better future for her son. I sincerely hope she will be given the opportunity to remain with her family and continue the life she has worked so hard to build here.

Thank you for your time and consideration. If you require any additional information, please do not hesitate to contact me.

Respectfully,

Anna Marczewska, RDH
Dental Hygienist

[redacted]

Anna Marczewska

Magnolia Green Dental Care

July 9th, 2026

To The Honorable Judge:

I am writing to offer my wholehearted support for Arianny Carolina Villalobos-Chaparro. As the dentist with whom she has worked closely, I have had the opportunity to observe her professionalism, compassion, integrity, and dedication firsthand.
Arianny has proven herself to be an extremely reliable and hardworking part of our practice. She approaches every task with a positive attitude and a level of professionalism. Arianny genuinely cares about the well-being of all of our patients. Her strong work ethic and dependability have made her an invaluable part of our team.

Outside of the office, Arianny is a devoted single mother to her eight-year-old son, Jose. She works diligently to provide him with a safe, stable, and loving environment while striving to create a brighter future for their family. Arianny has consistently demonstrated honesty, integrity, and an exceptional sense of responsibility both personally and professionally during the entire time I have known her.

Arianny has become someone our team and patients rely upon every day. Her absence would be deeply felt by our office, and more importantly, it would have a tremendous impact on her son, who depends on her as his primary caregiver.

I respectfully ask that her circumstances be given thoughtful and compassionate consideration. She is a person of strong moral character who has worked hard to make a positive contribution to our community, and I sincerely hope she is afforded the opportunity to continue the life she has worked hard to establish in the United States with her family.

Please feel free to contact me if any additional information would be helpful.

Respectfully,

Dr. Sylvanna Cahill, DMD
Dentist
Magnolia Green Dental Care
[redacted]

Magnolia Green Dental Care
6975 Professional Parkway East, Suite B
Sarasota FL, 34240
Phone: (941) 240-2750 Fax: (863) 808-0589

BAYSIDE
community church

Bradenton July 18, 2026

To Whom It May Concern,

It is with great pleasure that I write this letter to attest to the outstanding moral character and dedication of Mrs. Arianny Villalobos. Mrs. Villalobos has been part of our community since February of 2024. She is a member of our volunteer's team of Bayside Spanish Ministry and participates regularly of our weekly services.

In her capacity as a volunteer for our Spanish Ministry, she had consistently demonstrated exceptional reliability, compassion, and a genuine desire to serve others.

Beyond her practical contributions, Arianny is known for her strong ethical values, honesty, and empathy. She consistently displays the core virtues of patience, kindness, and humility in all her interactions.

Based on my personal and professional experience with her, I can wholeheartedly recommend Arianny Villalobos as a person of high moral standing. She is a tremendous asset to our church and community.

Please feel free to contact me at [redacted] should you need any further information.

Sincerely,

Guillermo Portal
Spanish Coordinator
[redacted]

15800 SR 64 EAST BRADENTON, FL 34212 O. 941.755.8600 // F. 941.755.8611

To The Honorable Judge,

I am writing this letter to wholeheartedly support Arianny C. Villalobos-Chaparro. I have had the pleasure of working with Ari at our dental practice, and as a fellow dental assistant, I have worked alongside her every day. Over that time, I have gotten to know her not only as an excellent coworker but also as a genuinely kind and caring person.

From the moment Ari joined our office, she has been dependable, hardworking, and always willing to help wherever she is needed She consistently goes above and beyond for both our patients and our team She treats every patient with kindness, patience, and respect, making them feel comfortable and cared for from the moment they arrive.

One of the things I admire most about Ari is her positive attitude. No matter how busy or stressful the day gets, she stays calm, professional, and ready to support her coworkers. She is someone I know I can always count on, and she has become an important part of our team.

Outside of work, Ari is a devoted single mother to her seven-year-old son. She works incredibly hard to provide him with a safe, stable, and loving home while balancing the demands of her career. Seeing her dedication both as a mother and as a professional has given me so much respect for her strength and determination.

I truly believe Ari is a person of excellent character. She is honest, compassionate, and committed to making a positive difference in the lives of those around her. Our office has been fortunate to have her as part of our team, and I know our patients feel the same.

I respectfully ask that you give her case your full and thoughtful consideration. She has worked hard to build a stable life for herself and her son, and I sincerely hope she is given the opportunity to continue doing so.

Thank you for your time and consideration. If you need any additional information, please feel free to contact me.

Diana Carolina Collazos, EFDA





Ailin Rivas, R.D.H.
[redacted]

To Whom It May Concern:

I am writing to offer my wholehearted support for Arianny Carolina Villalobos-Chaparro in her immigration case. I have had the privilege of working alongside Arianny at Lifetime Dentistry in Bradenton, FL, where she serves as a dental assistant. Throughout the time I have known her, she has consistently demonstrated professionalism, compassion and an exceptional work ethic. She is a dependable and highly respected member of our team who genuinely cares about the well-being of every patient she assists.

Arianny is not only an outstanding employee but also an exceptional person. She is always willing to help others, maintains a positive attitude, and contributes to creating a welcoming and supportive environment for both patients and coworkers. Her kindness, integrity and dedication have earned the trust and admiration of everyone who works with her.

Outside of work, Arianny is a devoted single mother to her eight-year-old son. She works incredibly hard to provide him with a safe, stable, and loving home while continually striving to improve their future. She has taken the initiative to further her education by pursuing a career in dental hygiene, demonstrating her determination to create better opportunities for herself and her son through honest work and perseverance.

Arianny is a woman of strong moral character who conducts herself with honesty, responsibility and respect in every aspect of her life. She is an important part of our dental practice, and her absence would be deeply felt by our team, our patients and most importantly by her young son, who relies on her as the primary caregiver. I respectfully ask that you give thoughtful consideration to her case. Arianny has worked diligently to build a meaningful life in the United States, and I sincerely hope she will be granted the opportunity to remain with her family and continue making positive contributions to our community. If you require any additional information, please do not hesitate to contact me.

Sincerely,

Ailin Rivas R.D.H.
Lifetime Dentistry

July 9th, 2026

To The Honorable Judge,

My name is Eva Roszak, and I am the Office Manager at Magnolia Green Dental Care, where Arianny C. Villalobos-Chaparro works as a dental assistant. I have had the privilege of supervising and working alongside Arianny professionally on and off for over a year, and I am honored to provide this letter in support of her.

During the time I have known Arianny, she has consistently demonstrated exceptional character, integrity, and professionalism. She is one of the most dependable employees I have had the opportunity to work with. I know that when Arianny is scheduled, she will arrive prepared, work diligently throughout the day, and treat every patient and coworker with kindness, respect, and compassion.

What stands out most about Arianny is not only her work ethic, but the genuine care she shows to everyone around her. She has a remarkable ability to make people feel welcome and valued. Whether she is helping a nervous patient, supporting a teammate, or simply offering encouragement to someone having a difficult day, her kindness is sincere and effortless. She is generous with both her time and her heart.

Arianny is also deeply committed to improving herself. Although she is a trained dentist in Venezuela, she has worked tirelessly toward continuing her professional career in the United States. She has been diligently preparing to become a registered dental hygienist, dedicating countless hours to studying for her examination, which she was scheduled to take this week. Her determination to build a better future through education and hard work has been inspiring to witness.

Beyond her professional accomplishments, Arianny is a devoted mother to her seven-year-old son. In every conversation about her family and future, it is clear that providing a stable, loving life for her child is one of her greatest motivations. She approaches both motherhood and her career with extraordinary dedication, responsibility, and perseverance.

I can say without hesitation that Arianny is a person of outstanding moral character. She is honest, reliable, compassionate, and hardworking. She has earned the respect and admiration of our entire team, and her absence has been deeply felt by both her coworkers and our patients.

It has been heartbreaking to witness the circumstances she and her family are facing. While I cannot speak to the legal aspects of her case, I can speak confidently to the person I know. Arianny is someone who contributes positively to those around her every single day. She embodies the values of hard work, compassion, personal responsibility, and service to others.

I respectfully ask that you consider my firsthand observations of Arianny's character as you review her case. She has my highest recommendation and unwavering support.

Thank you for your time and consideration.

Sincerely,



Eva Roszak-Mika
Office Manager

To Whom It May Concern:

My name is Reinier Diaz, RDH, and I am writing this letter in support of Arianny Carolina Villalobos Chaparro, who is currently in ICE custody.

I had the opportunity to work with Arianny at Advance Dental Care, where she worked as a temporary dental professional. During the time we worked together, I came to know her as an exceptionally hardworking, responsible, and dependable individual. She consistently demonstrated professionalism, integrity, and compassion in her interactions with both patients and coworkers.

In addition to working together, Arianny and I have also spent many hours studying side by side as international dentists preparing to continue our professional education in the United States. Through this experience, I have witnessed firsthand her determination, discipline, and commitment to building a better future through education. She has invested countless hours studying, preparing for examinations, and working toward the goal of becoming a licensed dentist in this country. Her dedication to achieving this dream has been truly inspiring.

Beyond her professional aspirations, Arianny is a devoted mother. It has always been evident to me that her son is the center of her life and the primary motivation behind everything she does. She works tirelessly to provide for him, support him, and create a better future for their family.

Based on my personal experience with Arianny, both as a coworker and as a fellow international dentist pursuing the same professional path, I can confidently say that she is a person of strong moral character, honesty, and perseverance. She is someone who contributes positively to those around her and has always shown respect for others and a sincere desire to improve herself through hard work.

I respectfully ask that you take my personal observations into consideration as you review her case. I sincerely hope she is given the opportunity to reunite with her son, continue pursuing her education and career, and remain a productive and positive member of the community.

Thank you for your time and thoughtful consideration.

Sincerely,

Reinier Diaz
Dental Hygienist
Advance Dental Care

5275 UNIVERSITY PARKWAY, #127
UNIVERSITY PARK, FL 34201
941-926-6347

David Castro
Brand Ambassador
Premier Martial Arts UTC
941-926-6347
Info@pmautc.com
7/22/26

Honorable Immigration Judge / ICE Deportation Officer
Re: Support Letter for Ari Villalobos
Alien Registration Number (A-Number): N/A

Dear Immigration Judge or Officer,
My name is David Castro and I am the Brand Ambassador and Head Instructor at Premier Martial Arts UTC located in University Park, FL. I have served in this role for 4+ years. I am writing this letter in strong support of Ari Villalobos, who is the parent of my dedicated martial arts student, [redacted]
I have known Ari for 3+ years, during which time she has consistently shown herself to be a deeply committed, responsible, and caring parent [redacted] has been a student at our academy since June 2023, and throughout this time, Ari has been actively involved in their child's progress and development.
In my professional observation, Ari consistently brings [redacted] to class on time, attends training sessions to support him, and reinforces the core values we teach—such as discipline, respect, and perseverance—at home. She frequently communicates with me regarding his progress, always showing immense dedication to [redacted] well-being and education.
Based on my interactions with Ari and our local community, I know her to be a person of high moral character, honesty, and peaceful demeanor. She is a vital presence in [redacted] life, and her prolonged absence or removal would cause profound emotional and developmental hardship for [redacted]

I respectfully ask that you consider Ari Villalobos's strong ties to this family and community when reviewing her case. Please feel free to contact me at 941-926-6347 or info@pmautc.com if you require any further information or verification.

Sincerely,

David Castro
Brand Ambassador/Head Instructor
Premier Martial Arts UTC

EXHIBIT 18

Sworn affidavit of U.S. citizen sponsor Bonnie Francis, CRDH, offering housing and support upon release (July 27, 2026)

Villalobos Chaparro v. Warden, Dilley Immigration Processing Center, et al.

Bond Sponsor Affidavit:
ARIANNY CAROLINA VILLALOBOS CHAPARRO ALIEN NR.: [redacted]

Bond Sponsor: Bonnie Francis MS, CRDH
Residential Address: [redacted]
Employment: Magnolia Green Dentistry 6975 Professional Parkway, Ste B Sarasota, FL
DOB: [redacted] **Born:** Utah/USA Citizen USA

July 27, 2026

Arianny (Ari) started working with us on and off as a temporary Dental Assistant almost a year ago, and was hired permanently with us at Magnolia Green Dental April 2026. During that time, Ari routinely demonstrated professionalism and in-depth knowledge of dentistry and patient care. She was a dentist in Venezuela before arriving in the US, and has been navigating the strict requirements for professional licensure in the US, working first as a Dental Assistant. As a Dental Hygiene educator for many years, I am well aware of the rigors of licensure and was helping her take the next step and prepare for the Dental Hygiene National Board examination, which she was scheduled to take July 2026.

During our time working together, I saw firsthand her dedication and drive to secure a better world for her and her seven-year-old son, [redacted] I personally have seen her honesty, integrity, reliability, and work ethic in practice every day as a dental assistant. She eagerly comes to work with a big smile, greeting us all with kindness and gratitude. She competently and professionally completes her daily tasks and works well with all our dental team. Most importantly, she has shared her dedication and love for her son, [redacted] whom we have all grown to know and love as she shares his life adventures and drawings.

In my personal and professional opinion, I believe Ari was unjustly detained and more than deserves the opportunity to be released and continue her professional and personal pursuits.

I Bonnie Francis am able and willing to provide Arianny Carolina Villalobos Chaparro with housing and/or financial assistance if needed.

I am able and willing to ensure she complies with all court hearings and immigration requirements.

Thank you for your consideration,

Bonnie Francis MS, CRDH

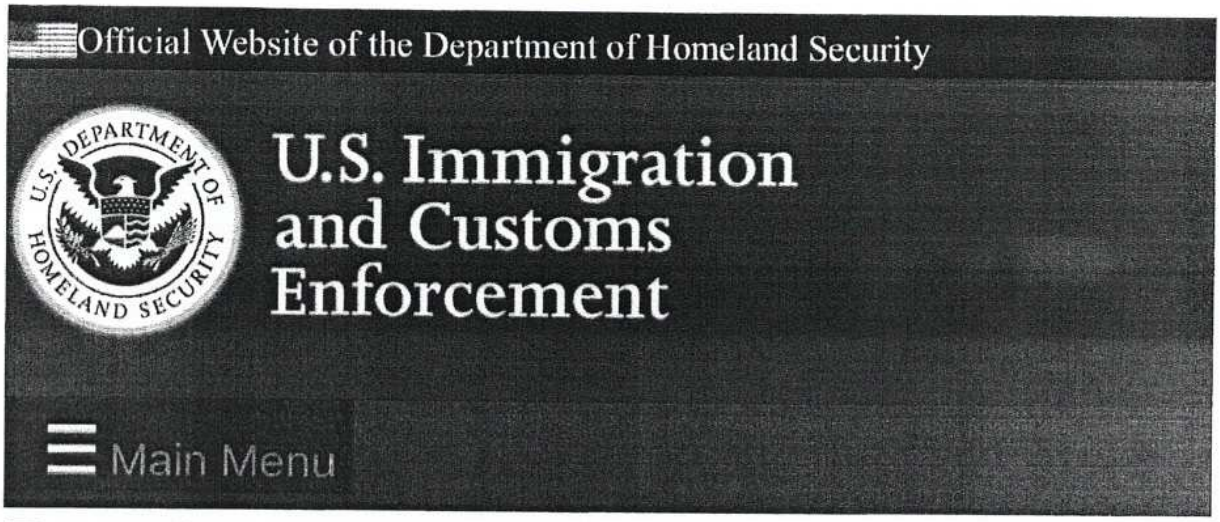
Attachments: Copy of FLDL, USPP, 2025 Tax Return, recent pay stub and Chase Bank Savings Account statement

[illegible] [illegible]

[illegible] MORRIS
Notary Public
State of Florida
Comm# HH [illegible]
Expires [illegible]

EXHIBIT 19

ICE Online Detainee Locator System Search Result reflecting Petitioner in ICE custody at the Dilley Immigration Processing Center, Dilley, Texas (captured August 30, 2026)



Resultados de Búsqueda: 1

ARIANNY CAROLINA VILLALOBOS-CHAPARRO

Pais de Nacimiento : Venezuela

Número A: [redacted]

Estatus : Bajo custodia del ICE

Estado: TX

Centro de Detención Actual: DILLEY IMMIGRATION PROCESSING CENTER

**Haga clic en el nombre del Centro de Detención para obtener información de contacto.*