

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF KENTUCKY  
AT LOUISVILLE

RUBI CHAVEZ ALARCON

PETITIONER

v.

CIVIL ACTION NO. 3:25-cv-00348-DJH (*e-filed*)

JAILER JEFF TINDELL  
TODD M. LYONS, ACTING DIRECTOR  
KRISTI NOEM, SECRETARY  
PAM BONDI, ATTORNEY GENERAL

DEFENDANTS

**RESPONSE TO ORDER TO SHOW CAUSE**  
**WHY WRIT OF HABEAS CORPUS SHOULD NOT BE GRANTED**

On June 16, 2025, this Court forwarded to the Office of the United States Attorney an order that each respondent named in Petitioner Alarcon's Petition for Writ of Habeas Corpus show cause by June 20, 2025 why the writ should not be granted. (Doc. 4, PageID.11.). The Office of the United States Attorney has filed a Motion to Dismiss Cruz's petition. (Doc. 5.). That motion explains in detail that Cruz's petition is subject to dismissal because it recites no facts consistent with any deprivation of due process, attempts to raise issues for which judicial review is precluded, and by the time of the hearing scheduled in that matter, will be moot because Alarcon will be removed to Mexico, consistent with her directions to her counsel.

This filing, incorporating the content of the Motion to Dismiss, addresses the Court's order that the respondents show cause why the writ should not be granted. This filing is submitted on behalf of respondents Todd M. Lyons, Kristi Noem, and Pam Bondi. 28 U.S.C. § 517 allows the Office of the United States Attorney to make appearances in court to attend to the United States' interests, and consistent with that statute, this filing, and the content of the Motion to Dismiss, attends to the United States' interests including to the extent the petition names Jeff Tindell, the Oldham County Jailer, as a respondent.

Respectfully submitted,

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United States Attorney

/s/ Jason Snyder  
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*Counsel for the United States*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 20, 2025, I electronically filed the foregoing with the clerk of the court by using the CM/ECF system, which will send a notice of electronic filing to counsel for the Plaintiff.

/s/ Jason Snyder  
Jason Snyder  
Assistant United States Attorney