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5 EMMA MARCELA CRESPIN DE PAZ

6 IN THE UNITED STATES DISTRICT COURT
7
8 CENTRAL DISTRICT OF CALIFORNIA

9 EMMA MARCELA CRESPIN DE PAZ,

10 Petitioner,

11 v.

12 Kristi NOEM, Secretary, Department of
13 Homeland Security; Pam BONDI, Attorney
General; EXECUTIVE OFFICE FOR
14 IMMIGRATION REVIEW; Todd LYONS,
15 Executive Associate Director of ICE
Enforcement and Removal
16 Operations (ERO); and David A. MARIN,
17 Adelanto Immigration and Customs
Enforcement Field Office Director,

18 Respondents.
19

CASE NO.:

PETITION FOR WRIT OF HABEAS CORPUS
AND COMPLAINT FOR DECLARATORY
AND INJUNCTIVE RELIEF

20 INTRODUCTION

21 1. Petitioner Emma Marcela Crespin de Paz has been residing in Los Angeles, California,
22 United States, since 1999, where she became heavily involved in community activities, such as
23 neighborhood watch, food bank and meals on wheels volunteering, and devoting her time to
24 local non-profits. Petitioner was apprehended by immigration authorities on or about June 25,
25 2025, in Los Angeles, California, in a widescale immigration enforcement action.

26 2. Petitioner is currently detained at the Adelanto detention center by immigration
27 authorities and is the subject of a pending removal hearing.
28

1 3. Petitioner is charged with having entered the United States without inspection and
2 being present without valid immigration documents. 8 U.S.C. § 1182(a)(6)(A)(i), §
3 1182(a)(7)(A)(i).

4 4. Petitioner was denied release by the Department of Homeland Security (DHS) and has
5 sought a bond redetermination hearing before an immigration judge. Petitioner is likely to be
6 denied the opportunity for a bond redetermination hearing because the immigration judge will
7 likely hold that he lacks jurisdiction over the bond hearing based on new agency policy that all
8 persons who entered without inspection are deemed applicants for admission to the United
9 States and are ineligible for bond redetermination hearings based on the immigration statute, 8
10 U.S.C. § 1225(b)(2)(A).

11 5. Section 1225(b)(2)(A) states that an applicant for admission seeking admission shall be
12 detained for a removal proceeding. It is the position of the Executive Office for Immigration
13 Review (EOIR), which houses both the BIA and immigration judges, that 8 U.S.C. §
14 1225(b)(2)(A) applies to all individuals who arrived in the United States without documents,
15 regardless of how long they have lived in the United States and regardless of how far they were
16 apprehended from the border.

17 6. However, § 1225(b)(2)(A) does not apply to individuals, like Petitioner, who
18 are present in the United States. And attempting to apply that statute to Petitioner
19 contravenes the law itself and decades-old practice that such statute *does not* in fact, apply to
20 persons in Petitioner's position. Instead, such individuals are subject to detention under a
21 different statute, § 1226(a), and eligible for release on bond.

22 7. Nevertheless, earlier this month, ICE released a memorandum instructing its
23 attorneys to coordinate with the Department of Justice, the agency housing EOIR, to
24 reject bond redetermination hearings for *all* applicants who arrived in the United States without
25 documents.

26 8. EOIR has already applied this reasoning in a May 22, 2025, BIA decision, finding that
27 a noncitizen who had been residing in the United States for almost ten years and had entered the
28 United States without documents was ineligible for bond.

9. Further, despite a legal ruling in *Rodriguez v. Bostock*, 2025 WL 1193850

1 (W.D. Wa. Apr. 24, 2025), rejecting this position, Respondents continue to maintain that
2 noncitizens who entered the United States without inspection are not eligible for bond
3 redetermination hearings, because they are applicants for admission within the meaning
4 of 8 U.S.C. § 1225(b)(2)(A).

5 10. This reading is a violation of the statute and due process.

6 11. As such, Petitioner seeks a writ of habeas corpus, and an order of declaratory and
7 injunctive relief and set aside relief under the Administrative Procedure Act requiring that she be
8 provided a bond redetermination hearing before the immigration judge.

9 JURISDICTION AND VENUE

10 12. This Court has jurisdiction under 28 U.S.C. § 2241 (federal habeas statute); 28 U.S.C.
11 § 1331 (federal question); 28 U.S.C. § 2201-2 (declaratory judgment); and United
12 States Constitution Article I, Section 9 (Suspension Clause).

13 13. Venue properly lies within the Central District of California under 28 U.S.C. § 1391,
14 because this is a civil action in which Respondents are agencies of the United States, Petitioner
15 is detained in this District, and a substantial part of the events or omissions giving rise to this
16 action occurred in the District.

17 PARTIES

18 14. Petitioner resides in Los Angeles, California and is currently detained at the Adelanto
19 immigration detention center. Petitioner has resided in the Central District since 1999, has at
20 least one United States Citizen immediate relative, does not have a criminal record, and has a
21 viable avenue for obtaining an immigration benefit in immigration court.

22 15. Respondent Kristi Noem is the Secretary of the Department of Homeland
23 Security (“DHS”) and is sued in her official capacity. The Secretary of Homeland
24 Security is charged with the administration and enforcement of immigration laws. 8 U.S.C.
§1103(a).

25 16. Respondent Pam Bondi is the Attorney General of the United States and is
26 sued in her official capacity as the head of the Department of Justice. The Attorney
27 General is responsible for the fair administration of the laws of the United States.

28 17. Respondent Executive Office for Immigration Review is a component agency

1 of the Department of Justice responsible for conducting removal and bond hearings of
2 noncitizens. EOIR is comprised of a lower adjudicatory body administered by
3 immigration judges and an appellate body known as the Board of Immigration Appeal (BIA).
4 Immigration judges issue bond redetermination hearing decisions, which are then subject to
5 appeal to the BIA.

6 18. Respondent Todd Lyons is the Acting Director of U.S. Immigration and
7 Customs Enforcement (ICE) and is sued in his official capacity. ICE is responsible for
8 the detention of Petitioner.

9 19. Respondent David A. Marin is the Immigration and Customs Enforcement
10 Field Office Director at the ICE Adelanto immigration detention facility and is sued in
11 his official capacity. Respondent Marin is responsible for the detention of Petitioner.

12 LEGAL BACKGROUND

13 20. The Immigration and Nationality Act (INA) prescribes three basic forms of
14 detention for noncitizens in removal proceedings.

15 21. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard
16 non-expedited removal proceedings before an immigration judge (IJ). See 8 U.S.C. §
17 1229a. Individuals in § 1226(a) detention are entitled to a bond hearing at the outset of
18 their detention, see 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been
19 arrested, charged with, or convicted of certain crimes are subject to mandatory detention,
20 see 8 U.S.C. § 1226(c).

21 22. Second, the INA provides for mandatory detention of noncitizens subject to expedited
22 removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking
23 admission referred to under § 1225(b)(2).

24 23. Last, the Act also provides for detention of noncitizens who have been previously
25 ordered removed, including individuals in withholding-only proceedings, see
26 8 U.S.C. § 1231(a)–(b).

27 24. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

28 25. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part
of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996,

1 Pub. L. No. 104–208, Div. C, §§ 302–03, 110 Stat. 3009–546, 3009–582 to 3009–583,
2 3009–585. Section 1226(a) was most recently amended earlier this year by the Laken
3 Riley Act, Pub. L. No.119-1, 139 Stat. 3 (2025).

4 26. Following enactment of the IIRIRA, EOIR drafted new regulations explaining that, in
5 general, people who entered the country without inspection were not considered detained under
6 § 1225 and that they were instead detained under § 1226(a). See Inspection and Expedited
7 Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings;
8 Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

9 27. Thus, in the decades that followed, most people who entered without
10 inspection—unless they were subject to some other detention authority—received bond
11 hearings. That practice was consistent with many more decades of prior practice, in
12 which noncitizens who were not deemed “arriving” were entitled to a custody hearing
13 before an IJ or other hearing officer. See 8 U.S.C. § 1252(a) (1994); see also H.R. Rep.
14 No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply “restates” the detention
15 authority previously found at § 1252(a)).

16 28. Respondents’ new policy turns this well-established understanding on its head and
17 violates the statutory scheme.

18 29. Indeed, this legal theory that noncitizens who entered the United States without
19 admission or parole are ineligible for bond hearings was already rejected by a District Court in
20 the Western District of Washington, finding that such individuals are

21 entitled to bond redetermination hearings before immigration judges, and rejecting the
22 application of § 1225(b)(2) to such cases. *Rodriguez v. Bostock*, No. 3:25-CV-05240-
23 TMC, 2025 WL 1193850, at *12 (W.D. Wash. Apr. 24, 2025).

24 30. Despite this finding from a federal court, in July 2025, ICE released a memorandum
25 instructing its attorneys to coordinate with the Department of Justice, the agency housing EOIR,
26 to reject bond redetermination hearings for applicants who arrived in the United States without
27 documents.
28

1 31. A May 22, 2025, unpublished BIA decision confirms that EOIR is taking this same
2 position that noncitizens who entered the United States without admission or parole are
3 ineligible for immigration judge bond hearings.

4 32. This is now a widespread position applying across the United States.

5 33. This interpretation defies the INA. The plain text of the statutory provisions
6 demonstrates that § 1226(a), not § 1225(b), applies to people like Petitioner.

7 34. Section 1226(a) applies by default to all persons “pending a decision on whether the
8 [noncitizen] is to be removed from the United States.” These removal hearings are held under §
9 1229a, which “decid[e] the inadmissibility or deportability of a[] [noncitizen].”

10 35. The text of § 1226 also explicitly applies to people charged as being inadmissible,
11 including those who entered without inspection. See 8 U.S.C. § 1226(c)(1)(E). Subparagraph
12 (E)’s reference to such people makes clear that, by default, such people are afforded a bond
13 hearing under subsection (a). Section 1226 therefore, leaves no doubt that it applies to people
14 who face charges of being inadmissible to the United States, including those who are present
without admission or parole.

15 36. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or
16 who recently entered the United States. The statute’s entire framework is premised on
17 inspections at the border of people who are “seeking admission” to the United States. 8
18 U.S.C. § 1225(b)(2)(A).

19 37. Accordingly, the mandatory detention provision of § 1225(b)(2) does not apply to
20 people like Petitioner who are alleged to have entered the United States without
21 admission or parole. Such a reading of the statute would have the additional deleterious
22 effect of rendering surplusage the most recent amendment to § 1226(c), under the Laken Riley
23 Act of 2025, subjecting non-citizens with certain criminal arrests or convictions, who entered
24 without inspection, to mandatory detention.

25 FACTS

26 38. Petitioner has resided in the United States since 1999 and lives in Los
27 Angeles, California.
28

1 39. On or about June 25, 2025, Petitioner was arrested by immigration authorities as part
2 of a widescale immigration enforcement action in Los Angeles.

3 40. Petitioner was placed into removal proceedings to appear before an immigration
4 judge and was alleged to have entered the United States without inspection and being present in
5 the United States without valid immigration documents. 8 U.S.C. § 1182(a)(6)(A)(i), §
6 1182(a)(7)(A)(i).

7 41. ICE denied Petitioner's request for release, and she requested a bond redetermination
8 hearing before an immigration judge. The immigration judge is likely to find that it has no
9 jurisdiction to hear Petitioner's petition for bond redetermination, thus depriving Petitioner of an
10 opportunity to seek and obtain release from immigration detention, and causing Petitioner to
11 suffer undue hardship and irreparable harm, by being subjected to detention that may be illegal,
12 coupled with exposing Petitioner to suffer worsening of chronic health conditions that render
13 Petitioner particularly susceptible to fainting, dizziness, vertigo, and the inability to ambulate
14 normally.

15 42. Petitioner has at least one United States citizen immediate relative, her sister, who
16 misses her very much, and has no criminal history. Petitioner is the sole financial provider for
17 his family, has steady employment, attends church regularly, and is an active volunteer in his
18 community. Petitioner is neither a danger to others nor a flight risk. Petitioner has resided in the
19 District since 1999 and is heavily involved in community activities. Petitioner has attached as
20 exhibits herein true and correct copies of her bond redetermination petition (EX A), her notice to
21 appear in immigration court (EX B), and record of deportable/inadmissible alien (EX C).

22 43. On July 3, 2025, an Adelanto IJ made a tentative finding that he lacked jurisdiction
23 to conduct a bond redetermination hearing because Petitioner was an applicant for
24 admission.

25 44. Any appeal to the Board of Immigration Appeals is futile. The BIA is also likely to
26 deny Petitioner the opportunity to seek and obtain release from immigration detention, and even
27 if the BIA were to entertain Petitioner's claim, Petitioner is likely to remain in unlawful
28 immigration detention for at least six months before the BIA even issues a decision in
Petitioner's case.

CAUSES OF ACTION

COUNT I

Violation of 8 U.S.C. § 1226(a)

Unlawful Denial of Bond Hearing

45. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

46. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to noncitizens residing in the United States who are subject to the grounds of inadmissibility because they previously entered the country without being admitted or paroled. Such noncitizens are detained under § 1226(a), unless they are subject to another detention provision, such as § 1225(b)(1), § 1226(c), or § 1231.

47. The application of § 1225(b)(2) to bar Petitioner from receiving a bond redetermination hearing before an immigration judge violates the Immigration and Nationality Act. A blanket policy that renders Petitioner subject to mandatory detention under this provision is the functional equivalent of a denial of a substantial right, i.e., the right to seek and obtain release from immigration detention at a bond redetermination hearing, where the government bears the burden of proof to show by clear and convincing evidence that Petitioner is a flight risk or a danger to the community.

COUNT II

Violation of the Administrative Procedure Act

Unlawful Denial of Bond

48. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

49. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to noncitizens residing in the United States who are subject to the grounds of inadmissibility because they originally entered the United States without inspection or parole. Such noncitizens are detained under § 1226(a), unless they are subject to another detention provision, such as § 1225(b)(1), § 1226(c) or § 1231.

1 50. The application of § 1225(b)(2) to bar Petitioner from receiving a bond
2 redetermination hearing before an immigration judge is arbitrary, capricious, and not in
3 accordance with law, and as such, it violates the APA. See 5 U.S.C. § 706(2).

4 COUNT III

5 Violation of Procedural Due Process

6 51. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation
7 in the preceding paragraphs as if fully set forth herein.

8 52. The government may not deprive a person of life, liberty, or property without due
9 process of law. U.S. Const. amend. V. “Freedom from imprisonment—from government
10 custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the
11 Clause protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct.
12 2491, 150 L.Ed.2d 653 (2001).

13 53. Petitioner has a fundamental interest in liberty and being free from official
14 restraint.

15 54. The government’s detention of Petitioner without a bond redetermination hearing to
16 determine whether he is a flight risk or danger to others violates his right to due process.

17 PRAYER FOR RELIEF

18 WHEREFORE, Petitioner respectfully requests that this Court:

- 19 a. Assume jurisdiction over this matter;
20 b. Declare that the refusal to allow Petitioner a bond redetermination hearing before
21 an immigration judge violates the INA, APA, and Due Process;
22 c. Issue a writ of habeas corpus requiring that Respondents release her or provide her the
23 bond hearing to which she is entitled within 14 days;
24 d. Set aside Respondents’ unlawful detention policy under the APA, 5 U.S.C. § 706(2);
25 e. Award reasonable attorneys’ fees and costs pursuant to the Equal Access to Justice
26 Act, 28 U.S.C. § 2412(d), 5 U.S.C. § 504, or any other applicable law; and
27 f. Order further relief as this Court deems just and appropriate.
28

1 Respectfully Submitted,

2
3
4 Dated: June 23, 2025

/s/ MARVIN E. VALLEJO

MARVIN E. VALLEJO

Counsel for Petitioner

EMMA MARCELA

CRESPIN DE PAZ

EXHIBIT A

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8 Attorney for Respondent,

9
10 **UNITED STATES DEPARTMENT OF JUSTICE**
11 **EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**
12 **ADELANTO, CA**

13 In the Matter of:)

14 CRESPIN DE PAZ, Emma Marcela)

File Number: A

15 Respondent.)

16
17
18
19
20 Honorable Immigration Judge: Maury, Carlos E.

Master Hearing: August 13, 2025 at
7:30AM

21
22
23
24
25
26 **REQUEST FOR BOND AND CUSTODY REDETERMINATION**

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**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
ADELANTO, CA**

In the Matter of:

CRESPIN DE PAZ, Emma Marcela

File Number: A

Respondent.

REQUEST FOR BOND AND CUSTODY REDETERMINATION

I. INTRODUCTION

Respondent, Emma Marcela Crespín de Paz (“Mrs. Crespín de Paz”) through counsel, respectfully requests that the Immigration Court accepts this request for bond and custody redetermination. Respondent is a fifty-seven-year-old national of Guatemala (**See Exhibit A**). She is currently in ICE custody in Adelanto with a pending hearing on July 03, 2025.

However, Respondent would like to continue her proceedings out of custody and request bond as she is statutorily eligible.

II. JURISDICTION

The Immigration Judge has the jurisdiction to adjudicate this motion under Title 8 Code of Federal Regulations Sections 1003.10, 1003.14, 1003.17, 1003.18, 1003.19 and 236.1 and 236.2. 8 CFR Section 236.1 states in part that the Immigration Judge has “the discretion and authority . . . as is appropriate and necessary for the disposition of such cases.” In addition, 8 CFR Section 1003.18 states that “all cases shall be scheduled by the Office of the Immigration Judge.”

1 Furthermore, a non-arriving detained alien, even one subject to mandatory detention has a
2 right to a bond hearing before an Immigration Judge. INA § 236; 8 C.F.R. §§ 1003.19 and 236.1
3 (1998.) The Immigration Judge has jurisdiction to determine Mrs. Crespin de Paz's bond pursuant
4 to 8 CFR 1003.19(c)(1):

5 Section 1003.19(c)(1) states in pertinent part that:

6 (c) Applications for the exercise of authority to review bond determinations shall
7 be made....

8 (1) If the respondent is detained, to the Immigration Court having
9 jurisdiction over the place of detention...

10 Mrs. Crespin de Paz is detained at the Adelanto Detention Center. Thus, jurisdiction rests
11 with the Adelanto Immigration Court. Mrs. Crespin de Paz is eligible for relief from removal as
12 she has a pending U-Visa Certification request and warrants discretionary release from detention
(See Exhibit B).

13
14 **A. Criteria For Considering Bond**

15 Bond should be granted to an alien who is detained unless there is a finding that the
16 individual is a threat to national security, likely to abscond or a poor flight risk. Matter of Patel,
17 15 I&N Dec. 666 (BIA 1976). In making this determination the Immigration Judge should
18 consider the following: local family ties, any prior arrests or convictions, employment or lack of
19 employment, membership in a community organization, manner of entry and length of residence
20 in the United States, immoral acts or participation in subversive activities and financial ability to
21 post bond. Matter of Patel, *supra*. Mrs. Crespin De Paz meets this standard and presents compelling
22 humanitarian, medical and community-based equities in support of her release.

23 Mrs. Crespin de Paz entered the United States in 1999 and has lived here since. Mrs.
24 Crespin de Paz is now of advanced age and currently suffers from serious medical conditions that
25 have been exacerbated by her confinement. These include chronic low blood sugar, placing her at
26 heightened risk of fainting, seizures, severe vertigo frequent dizziness and balance issues. She also
27 suffers from clinical anxiety and depression, both of which have worsened due to confinement,
28 loss of access to consistent mental health medication and the stress of being separated from her
supportive community (See Exhibit C). If she remains detained, we fear that her health will

1 continue to deteriorate to a life-threatening degree. She is currently already fallen ill, and her
2 physical and psychological well-being is rapidly declining.

3 The respondent has established and continues to demonstrate good moral character. Mrs.
4 Crespin de Paz is an exemplary member of the Los Angeles communities. Her release would
5 allow her to return to a life of service to others. Her deep community ties include:

- 6 1. Serving as a prominent leader in civic duties throughout Los Angeles and
7 participating highly in her communities Neighborhood Watch to ensure a safe
8 neighborhood. (See Exhibit D).
- 9 2. Volunteering extensively with local food banks and mutual aid networks, where
10 she regularly picks up, prepares and distributes food to undeserved families and
11 unhoused individuals. (See Exhibit E).
- 12 3. Maintaining consistent and well-documented relationships with community
13 nonprofits, and local leaders.

14 Her civic service has not gone unnoticed. Mrs. Crespin de Paz has received public
15 recognition and written support from members of the Los Angeles City Council, who are
16 inspired by her grassroots efforts and stand in support of her release. Their statements
17 confirm her deep local ties, her reputation for honesty and dedication and her value as a
18 civic leader. She is known in her community for her peaceful nature, generosity and
19 humility. There is no evidence that she poses any danger to the public or national security.
20 Her ongoing service work and strong moral character reflect her commitment to lawful and
21 peaceful conduct.

22 Mrs. Crespin de Paz has a reliable U.S. citizen sister as her sponsor who is prepared to
23 receive her, provide stable housing and transport her to all required hearing and
24 appointments (See Exhibit F).

25 III. CONCLUSION

26 Given her fragile medical condition, strong community roots, and compelling humanitarian
27 equities, Mrs. Crespin de Paz is an ideal candidate for bond. Continued detention places her health
28 and life at risk and deprives the Los Angeles community of one of its most compassionate

1 advocates. Respondent, through counsel, respectfully requests that this court grant a custody
2 redetermination hearing at the earliest available date; and set a reasonable bond.

3
4
5 DATE: 07/15/2025

Respectfully submitted,

6
7 

8

Karla Navarrete, Esq.

CRESPIN DE PAZ, EMMA MARCELA



DETAINED

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