

DISTRICT JUDGE ROBERT S. LASNIK
MAGISTRATE JUDGE MICHELLE L. PETERSON

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ALEJANDRO BALTODANO,

Petitioner,

v.

PAMELA BONDI, Attorney General of
the United States; KRISTI NOEM,
Secretary, United States Department of
Homeland Security; CAMMILLA
WAMSLEY, Seattle Field Office
Director, United States Citizenship and
Immigration Services; BRUCE SCOTT,
Warden of Immigration Detention
Facility; and the United States
Immigration and Customs Enforcement,

Respondents.

No. CV25-1958-RSL-MLP

**SUPPLEMENTARY BRIEFING IN
SUPPORT OF PRELIMINARY
INJUNCTION**

I. ADDITIONAL BIOGRAPHICAL DETAILS

At the preliminary injunction hearing in this case, the Court requested additional biographical details about Mr. Baltodano. *See* Dkt. 19. These facts are derived from Mr. Baltodano's declaration and additional exhibits filed with his request for a bond hearing in immigration court. Ex. 1; Dkts. 15-3, 15-4.

Alejandro Baltodano was born on [REDACTED], in Managua, Nicaragua. He and his family fled [REDACTED] and came to the United States in 1985. He voluntarily departed the United States for Nicaragua in 2013 and returned that year. He was deported to Nicaragua in 2019 and his last entry into the United States was in January 2024. Ex. 1.

1 After arriving in Nicaragua, he was immediately [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 Mr. Baltodano's criminal history is concentrated during the period between

6 2007–2015, and includes several less-serious offenses that were likely influenced by his

7 mental illness. Dkt. 15-4 at 50. The only prison sentence he received was for second-

8 degree robbery in 2015, for which he received a low-term two-year prison sentence. *Id.*;

9 *see* Cal. Penal Code § 213(a)(2) (“Robbery of the second degree is punishable by

10 imprisonment in the state prison for two, three, or five years.”). He has no recent

11 criminal history.

12 Mr. Baltodano has three United States-born children (one a stepchild). *See*

13 Dkt. 15-4 at 46–48. He grew up with his older sister, Wendy Cruz, who states that she

14 has a close relationship with him. She is willing to house Mr. Baltodano and able to

15 take him to doctors' appointments and ICE check-ins thanks to her flexible employment

16 as an apartment manager. Dkt. 15-4 at 19.

17 Mr. Baltodano has also been diagnosed with schizophrenia and post-traumatic

18 stress disorder, among other diagnoses. Dkt. 15-4 at 41. He is prescribed antipsychotic

19 medication; the most recently obtained record reflected that he was taking [REDACTED]

20 [REDACTED]

21 [REDACTED] *See* Dkt. 15-4 at 42–44.

22 DATED this 7th day of November 2025.

23 Respectfully submitted,

24 *s/ Ann K. Wagner*

25 Assistant Federal Public Defender

26 Attorney for Alejandro Baltodano