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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

JULIO LLANES TELLEZ

Petitioner/Plaintiff,

vs.

POLLY KAISER, Acting Field Office Director
of the San Francisco Immigration and Customs
Enforcement Office; TODD LYONS, Acting
Director of United States Immigration and
Customs Enforcement; KRISTI NOEM,
Secretary of the United States Department
of Homeland Security, PAMELA BONDI,
Attorney General of the United States, acting
in their official capacities,

Respondent/Defendant

Case No.: 25-cv-08982(PCP)

**DECLARATION OF ATTORNEY JULIO J.
RAMOS IN SUPPORT OF WRIT OF HABEAS
CORPUS**

DECLARATION OF ATTORNEY JULIO J. RAMOS IN SUPPORT OF WRIT OF HABEAS CORPUS

DECLARATION OF JULIO J. RAMOS

I, Julio J. Ramos, declared as follows under penalty of perjury:

1. I am an attorney licensed to practice in California and admitted in the Northern District of California. I represent Julio Llanes Tellez in connection with his detention by U.S. Immigration and Customs Enforcement ("ICE") and the accompanying Verified Petition for Writ of Habeas Corpus. I make this declaration based on personal knowledge and, where stated on information and belief, I believe the facts to be true.

2. On October 17, 2025, Mr. Llanes Tellez a citizen of Nicaragua and Asylum Applicant was taken into ICE custody during a routine check in at 630 Sansome Street, San Francisco, California. Shortly thereafter, Elsa Carranza Acuna his friend visited my office and retained me to represent him in this habeas action filed on that same date. He was given no notice or opportunity to be heard prior to detention. He entered the country on or about February 11, 2022 and works at a farm in the Gilroy/Hollister area.

3. Ms. Carranza Acuna has provided my office access to a file of immigration records for Mr. Llanes-Tellez. I reviewed those materials and assembled the exhibits submitted with this declaration in a single PDF titled "Julio Exhibit.pdf." To the best of my knowledge and belief, the following are true and correct copies of the documents they purport to be, identified by the lettering that appears on that file: Exhibits A–E.

Exhibit A — First Offender DUI counseling/treatment documentation: The exhibit includes: (a) a completion letter from Lifestyle Management, Inc. (Drydock II) dated August 19, 2024, confirming completion of the 3-month First Offender Program; (b) an electronic Notice of Completion Certificate (DL-101) reflecting enrollment 04/02/2024 and completion 08/19/2024 and identifying the DUI violation date 12/02/2023; (c) a payment plan for the program and appointment listing; and (d) San Benito Superior Court receipts referencing CR-23-01745 / VC 23152(b) dated 09/23/2024 (\$100), 11/12/2024 (\$900), and 03/06/2025 (\$200).

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Exhibit B — Section 236 of INA, Order of Release on Recognizance (Form I-220A) and related pages: The I-220A, dated February 11, 2022, releases Mr. Llanes Tellez on his own recognizance. The Personal Report Record reflects entries on 04/07/2023, 04/15/2024, and 08/16/2024. An Addendum lists additional conditions (e.g., register in a substance abuse program within 14 days and provide proof within 30 days; do not commit any crimes; provide probation/parole verification if applicable). A continuation page notes “Employment NOT Authorized.”.

Exhibit C — Asylum filing and Employment Authorization: This exhibit contains: (a) the Form I-589 (first page), bearing an A-number and a “NOV 30, 2022” stamp; (b) a USCIS Form I-797C, Notice of Action titled “Defensive Receipt Notice,” dated July 12, 2022; and (c) images of Petitioner’s Employment Authorization Document (category C08).

Exhibit D — Character/mitigation letters: The exhibit includes letters submitted on Petitioner’s behalf: (a) an October 19, 2025 letter from a community member describing Petitioner’s positive attributes and work ethic; (b) an October 21, 2025 letter from Elsa M. Carranza Acuna addressing Petitioner’s offense, completion of required programming, his support for family members abroad, and his character; and (c) an October 20, 2025 letter from Hilda Gavino describing Petitioner’s assistance, responsibility, rent payments, and reliability.

Exhibit E — Tax filings and wage information: This exhibit contains Petitioner’s California Form 540 (Tax Year 2024), including the signature and e-file authorization pages, and related W-2 documentation reflecting wages earned and state withholding; it also includes FTB e-file forms (FTB 8879 and 8455). (pp. 24–32).

4. Based on my review of the foregoing records, Mr. Llanes Tellez has a defensive asylum application pending in immigration court (filed November 30, 2022); he has valid employment authorization; he has filed tax returns; and he has completed alcohol counseling and the court imposed standard DUI sentencing for misdemeanor dui first offenders. He pled no contest to a single misdemeanor

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1 disposition under VC 23152(b) on August 20, 2024, and Mr. Llanes Tellez has fulfilled all court-
2 imposed requirements. There were no injuries or property damage involved in the DUI.

3 5. The Golden State Annex has been the subject of lawsuits for cruel and inhumane
4 treatment of immigration detainees. *Mendez v. U.S. Immigration and Customs Enforcement*, No. 3:23-
5 cv-00829-TLT (N.D. Cal. Feb. 23, 2023)(complaint paragraph 3: The collective hunger strike follows
6 years of peaceful advocacy by individuals detained at Mesa Verde and Golden State to demand better
7 treatment.)
8

9 6. I declare under penalty of perjury under the laws of the United States, pursuant to 28
10 U.S.C. § 1746, that the foregoing is true and correct.

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12 /s/ Julio J. Ramos
13 Julio J. Ramos (SBN. 189944)
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