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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Silveria Gonzalez Rodriguez



Petitioner,

v.

Pamela Bondi, in her official capacity as
Attorney General of the United States;
Kristi Noem, in his official capacity as
Secretary of the Department of Homeland
Security; Daren K. Margolin, Acting
Director, Executive Office for Immigration
Review; John Cantu, in his official capacity
as Phoenix Field Office Director,
Immigration and Customs Enforcement,
Enforcement and Removal Operations

Respondents.

Case No.:

**VERIFIED PETITION FOR
WRIT OF HABEAS CORPUS**

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INTRODUCTION

1. Petitioner, Silveria Gonzalez Rodriguez, moves this Court to issue a Writ of Habeas Corpus to compel the Respondents to appear and show cause why the Petitioner should not be released from the custody of the U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), and to order declaratory and injunctive relief to remedy her unlawful detention, and to enjoin the Respondents from continuing to deny her release from immigration custody.

SUMMARY OF THE ARGUMENT

2. Ms. Gonzalez Rodriguez is detained in the custody of the Department of Homeland Security (“DHS”), in the Eloy Detention Center at 1705 E Hanna Rd, Eloy, Arizona 85131 under 8 U.S.C. § 1226 and 8 C.F.R. § 1236. Respondents have claimed that the legal basis for her detention is 8 U.S.C. § 1225. He has been detained for roughly twelve weeks while removal proceedings remain pending.
3. On Augst 18, 2025, Ms. Gonzalez Rodriguez requested a custody redetermination (“bond”) hearing before an Immigration Judge. At a hearing on August 26, 2025, the Immigration Judge took no action.
4. On September 10, 2025, Ms. Gonzalez Rodriguez requested another bond hearing. At a hearing on September 16, 2025, the Immigration Judge found that he lacked jurisdiction to grant Ms. Gonzalez Rodriguez release on bond, finding that she was subject to detention pursuant to 8 U.S.C. § 1225. In so doing, the Immigration Judge relied on the Board of Immigration Appeals’ (“BIA”) recent decision in *Matter of Yajure Hurtado*, 29 I&N 216 (BIA 2025). Ms. Gonzalez Rodriguez has timely appealed and

1 her case is pending before the BIA. Exhibit B, Order Denying Bond; Exhibit C, Appeal
2 to the BIA.

3 5. As of today's date, October 20, 2025, Ms. Gonzalez Ramirez remains in immigration
4 detention and has been there for roughly **twelve weeks**.

5 6. Petitioner respectfully requests this Court to find that she is not detained pursuant to
6 INA § 1225, but rather 8 U.S.C. § 1226, and as such is entitled to either release or a
7 custody redetermination hearing in accordance with applicable law. Petitioner
8 requests that the Court find that Respondents' refusal to provide her with a bond here
9 is arbitrary and capricious and violates applicable regulatory, statutory, and
10 constitutional requirements.
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12 PARTIES

13 7. Petitioner Silveria Gonzalaez Rodriguez is a native and citizen of Mexico. See Exhibit
14 ___, Notice to Appear in Removal Proceedings. After roughly thirty years of peacefully
15 living and working in the United States, Ms. Gonzalez Rodriguez was detained and
16 placed in immigration proceedings by Immigrations and Customs Enforcement
17 ("ICE") officers following an arrest for speeding on July 26, 2025. See Exhibit E, I-
18 213.
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20 8. Respondent Pamela Bondi is sued in her official capacity as the Attorney General of
21 the United States. She has authority over the Executive Office for Immigration
22 Review ("EOIR"), and she has authority to issue appropriate directions to the Director
23 of the EOIR for the reasonable management of the immigration courts and their
24 dockets.
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1 9. Respondent Kristi Noem is sued in her official capacity as the Secretary of the
2 Department of Homeland Security (DHS). She is the executive officer who has been
3 given authority to manage and control the Immigration and Customs Enforcement.
4 As such, she is the ultimate legal custodian of the Petitioner.

5 10. Respondent Daren K. Margolin is sued in his official capacity as Acting Director of
6 the Executive Office for Immigration Review. He is responsible for the supervision of
7 the Chief Immigration Judge and all agency personnel—including the Immigration
8 Judges in the various local Immigration Courts throughout the country—in the
9 execution of their duties in accordance with 8 C.F.R. Part 3. He represents the
10 position and policies of EOIR to the Attorney General, Members of Congress, and
11 other governmental bodies.
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13 11. Respondent John Cantu is sued in his official capacity as the Phoenix Field Office
14 Director of Immigration and Customs Enforcement (ICE). In his official capacity, he
15 is a legal custodian over Petitioner because he is responsible for providing a detailed
16 worksheet, including a recommendation on continued detention or release, so that
17 the Headquarters Custody Determination Unit can make the final decision on
18 continued detention.
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20 JURISDICTION

21 12. This Court has jurisdiction under 28 U.S.C. § 2241(c)(3); Article I § 9, Clause 2 of
22 the United States Constitution (“Suspension Clause”), and 28 U.S.C. § 1331, as the
23 Petitioner is presently in custody under color of the authority of the United States, and
24 such custody is in violation of the Constitution, laws, regulations, and, or treaties of
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1 the United States, specifically the Immigration and Nationality Act (“INA”), 8 U.S.C. §
2 1101 *et seq.*

3 **13.** This Court may also exercise jurisdiction under 28 U.S.C. § 1361 (“Mandamus
4 Clause”). This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory
5 Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651 to
6 protect Petitioners’ rights under the Due Process Clause of the Fifth Amendment to
7 the United States Constitution and under applicable Federal law, and to issue a writ
8 of habeas corpus for his immediate release. *See generally INS v. St. Cyr*, 533 U.S.
9 289 (2001); *Zadvydas v. Davis*, 533 U.S. 678 (2001).

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11 **VENUE**

12 **14.** Venue is proper in the Arizona District Court because Ms. Gonzalez Rodriguez is
13 detained at the Eloy Detention Center, in Eloy, Arizona, and the records and
14 witnesses pertinent to his claim are likely to be found there. Eloy, Arizona is within
15 the geographical jurisdiction of this Court. Several of the Respondents reside and
16 work in their official capacity in this District. 28 U.S.C. 1391(e). Furthermore, it is a
17 convenient forum for both the Respondents and the Petitioner. *Branden v. 30th*
18 *Judicial Circuit Court*, 410 U.S. 484, 493-94 (1973).

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20 **STATEMENT OF FACTS**

21 **15.** Petitioner, Silveria Gonzalez Rodriguez, is a native and citizen of Mexico. She
22 entered the United States without inspection or admission by immigration officers
23 near Douglas, Arizona in 1995, when she was brought into the country at roughly the
24 age of nine. See Exhibit D, Bond Packet.

1 **16.** Ms. Gonzalez Rodriguez came into contact with immigration following an arrest by
2 the Maricopa County Sheriff Office (“MCSO”) for speeding in violation of Arizona
3 Revised Statutes (“A.R.S.”) § 28-701.02(A)(3). See Exhibit E, I-213. Before her
4 conviction, Ms. Gonzalez Rodriguez was living a peaceful life, doing her best to
5 support her family as the mother of a daughter just entering college and the daughter
6 of two parents with medical conditions. Unfortunately for Ms. Gonzalez Rodriguez,
7 she was living and working in Maricopa County at a time of draconian immigration
8 enforcement by DHS and EOIR.

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10 **17.** When Ms. Gonzalez Rodriguez was placed in immigration proceedings, DHS and
11 ICE did not assert that her arrest in any way made her removable or subject to
12 deportation, instead relying on her entry without inspection over which she had no
13 control. See Exhibit A, Notice to Appear.

14 **18.** On August 18, 2025, Ms. Gonzalez Rodriguez requested a bond hearing before an
15 Immigration Judge pursuant to 8 U.S.C. § 1226. On August 26, 2025, the Immigration
16 Juge took no action, neither approving nor denying the request.

17 **19.** Ms. Gonzalez Rodriguez again requested a bond hearing on September 10, 2025.
18 Ms. Gonzalez Rodriguez submitted evidence that she has been a single mother
19 raising her U.S. citizen daughter, [REDACTED] [REDACTED]. See Exhibit D, Bond
20 Packet. She submitted evidence that she has other strong family ties in the form of
21 her US citizen sister, who would have served as her sponsor. See *id.* She submitted
22 evidence that in the roughly thirty years that she has lived in the United States, she
23 has been a hardworking and devoted member of her community, helping friends and
24 family in times of need, and regularly attending church. See *id.* She submitted
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1 evidence that her parents suffered from a number of ailments including pre-diabetes.
2 *See id.* DHS submitted no evidence that Respondent was subject to mandatory
3 detention.

4 **20.** At her second bond hearing on September 16, 2025, the Immigration Judge ruled
5 that he lacked jurisdiction to grant Ms. Gonzalez Rodriguez bond, finding that she
6 was not detained under 8 U.S.C. § 1226, but rather under 8 U.S.C. § 1225, and as a
7 result was subject to mandatory detention. In doing so, the Immigration Judge relied
8 on the BIA's recent decision in *Matter of Yajure-Hurtado*, 29 I&N Dec. 216 (BIA 2025).
9 Exh. B, Order Denying Bond.

10 **21.** Ms. Gonzalez Rodriguez has timely appealed that decision and her appeal remains
11 pending before the BIA. Exhibit C, Appeal to the BIA.

12 **22.** Ms. Gonzalez Rodriguez remains in immigration custody, as she has been for
13 approximately the past **twelve weeks**.

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15 **LEGAL ARGUMENT**
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17 **23.** Ms. Gonzalez Rodriguez is detained under 8 U.S.C. § 1226 and 8 C.F.R. § 1236. The
18 statute expressly authorizes the Attorney General to release detained aliens on
19 "bond...or conditional parole" subject to the limitations in found at 8 U.S.C. § 1226(c). 8
20 U.S.C. § 1226(a)(2), (c). If they are not detained pursuant to 8 U.S.C. § 1226(c), a
21 detained alien may apply for release on bond and an Immigration Judge, exercising the
22 authority delegated from the Attorney General, must determine whether the alien would
23 "pose a danger to persons or to property" and "that the alien is likely to appear for any
24 scheduled proceeding or interview." 8 C.F.R. § 1003.19(h)(3).
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1 **24.** Respondents contend that Ms. Gonzalez Rodriguez is detained pursuant to 8 U.S.C.
2 § 1225. See Exhibit B, Order Denying Bond. Respondents contend that because Ms.
3 Gonzalez Rodriguez entered the United States without admission, inspection, or parole
4 by an immigration officer, she is subject to mandatory detention under 8 U.S.C. §
5 1225(b) as an “applicant for admission.” See *id.* (citing *Matter of Yajure Hurtado*, 29 I&N
6 Dec. 216, 220 (BIA 2025)). At present, no party contends that Ms. Gonzalez Rodriguez
7 is detained pursuant to 8 U.S.C. § 1226(c). See *id.*

8 **25.** To the extent that the government relies on *Yajure Hurtado* in refusing to consider Ms.
9 Gonzalez Rodriguez’s request for a bond hearing, the government has violated the
10 statute and applicable regulations and deprived Ms. Gonzalez Rodriguez of due
11 process.
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13 **26.** The Due Process clause of the constitution applies to all persons in the United States,
14 “whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*
15 *v. Davis*, 533 U.S. 678, 693 (2001). Procedural due process contains government
16 decisions that deprive individuals of property or liberty interests within the meaning of
17 the Due Process Clause of the Fifth Amendment. See *Mathews v. Eldrige*, 424 U.S.
18 319, 332 (1976); see also *Perry v. Sindermann*, 408 U.S. 593, 601-03 (1972)
19 (reliance on informal policies and practices may establish a legitimate claim of
20 entitlement to a constitutionally protected interest). Infringing on a protected interest
21 triggers a right to a hearing before that right is deprived. See *Board of Regents of State*
22 *Colleges v. Roth*, 408 U.S. 564, 569-70 (1972).
23

24 **27.** Ms. Gonzalez Rodriguez has a legitimate liberty interest in her potential release from
25 detention under INA § 1226. Her detention is arbitrary, capricious, and contrary to law
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1 as it misclassifies her as an “applicant for admission” and deprives her of that interest
2 without a meaningful opportunity to challenge the basis of her detention.

3 **28.** Respondents’ misclassification of Ms. Gonzalez Rodriguez is contrary to law because
4 it violates long-established canons of statutory construction by rendering the text of the
5 INA, congressional action, and recent Board precedent unnecessary and superfluous.

6 **29.** First, Respondents’ reading of 8 USC § 1225 cannot be squared with the fact that
7 that under “one of the most basic interpretive canons . . . [a] statute should be
8 construed so that effect is given to all its provisions, so that no part will be inoperative
9 or superfluous, void or insignificant[.]” *Corley v. United States*, 556 U.S. 303, 314
10 (2009) (cleaned up); *Shulman v. Kaplan*, 58 F.4th 404, 410–11 (9th Cir. 2023) (“a
11 court must interpret the statute as a whole, giving effect to each word and making
12 every effort not to interpret a provision in a manner that renders other provisions of
13 the same statute inconsistent, meaningless or superfluous.”) (cleaned up). “This
14 principle . . . applies to interpreting any two provisions in the U.S. Code, even when
15 Congress enacted the provisions at different times.” *Bilski v. Kappos*, 561 U.S. 593,
16 607–08 (2010).

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19 **30.** In order to detain Ms. Gonzalez Rodriguez under 8 U.S.C. § 1225(b), an immigration
20 officer must determine that the noncitizen “is an applicant for admission . . . seeking
21 admission . . . and not clearly and beyond a doubt entitled to be admitted.” 8 U.S.C.
22 § 1225(b)(2)(A). Determining the plain meaning of the statute requires consideration
23 of the tense of the verb “is” and the present participle “seeking.” Here, section
24 1225(b)(2) applies to aliens who are presently applicants for admission and who are
25 presently seeking admission at the time of their detention. To be seeking admission
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1 means to be seeking entry, which “by its own force implies a coming from outside.”

2 *United States ex rel. Claussen v. Day*, 279 U.S. 398, 401 (1929).

3 **31.** Ms. Gonzalez Rodriguez has been in the United States for roughly 30 years. She is
4 not currently “seeking admission” within the plain meaning of that term as she has
5 resided in the United States for decades. The longstanding interpretation of the INA
6 has been that an alien in her position is detained under section 1226 and entitled to
7 a bond hearing, as Respondents themselves have acknowledged. See *Yajure*
8 *Hurtado*, 29 I&N Dec. at 225, n. 6 (“We acknowledge that for years Immigration
9 Judges have conducted bond hearings for aliens who entered the United States
10 without inspection”). Consistent with Supreme Court precedent, this was the basis of
11 BIA decisions finding that aliens detained *shortly after an unlawful entry* were
12 applicants for admission because they “cannot be said to have ‘effected an entry.’”
13 *Matter of Q. Li*, 29 I&N Dec. 66, 68 (BIA 2025) (quoting *DHS vs. Thuraissigiam*, 591
14 U.S. 103, 140 (2020) (internal quotations omitted)).

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16 **32.** Respondents’ interpretation of section 1225 fails to account for other sections of the
17 INA as well. If all inadmissible aliens present without admission or inspection were
18 subject to mandatory detention under section 1225, there would be no reason for §
19 1226(c)(1)(A) and (D) to subject inadmissible aliens to mandatory detention for
20 committing certain criminal offenses. See 8 U.S.C. § 1226(c)(1)(A), (D).

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22 **33.** This is especially true in light of Congress’s recent decision to pass the Laken Riley Act.
23 See Laken Riley Act, Pub. L. No. 119-1, 139 Stat. 3 (2005). “When Congress acts to
24 amend a statute, we presume it intends its amendment to have real and substantial
25 effect.” *Stone v. I.N.S.*, 514 U.S. 386, 397 (1995) (citations omitted) (giving effect to
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1 a congressional amendment of the INA). The new additions to section 1226(c)
2 subject an additional class of inadmissible aliens to its mandatory detention scheme
3 if they find themselves so much as arrested for certain crimes. See 8 U.S.C. §
4 1226(c)(1)(E). The Laken Riley Act is even more specific than the older provisions
5 of section 1226(c), as it specifically refers to aliens like Respondent “inadmissible
6 under paragraph (6)(A), (6)(C), or (7) of section 1182(a) of this title.” 8 U.S.C. §
7 1226(c)(E)(i). The Supreme Court has recognized that when Congress creates
8 “specific exceptions” to a statute’s applicability, it proves that the statute would
9 generally apply absent those exceptions. See *Shady Grove Orthopedic Assocs., P.A.*
10 *v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010). Congress clearly acted with the
11 understanding that inadmissible aliens are generally detained under section 1226
12 and eligible to request bond, because if they were not, there would have been no
13 reason to amend the INA to require mandatory detention for inadmissible aliens
14 accused of certain criminal activities.
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16 **34.** Congress’s amendments to the INA demonstrate a consistent understanding of
17 section 1226 dating back to the legislative history of the Illegal Immigration Reform
18 and Immigration Responsibility Act (“IIRIRA”). Prior to IIRIRA’s passage, section
19 1226’s predecessor governed the detention of all aliens arrested and detained in the
20 United States and allowed for release on bond. See INA § 1252(a)(1) (1994).
21 Congress stated that IIRIRA section 1226(a) merely “restates the current provisions
22 in [the predecessor statute] regarding the authority of the Attorney General to arrest,
23 detain, and release on bond a[] [noncitizen] who is not lawfully in the United States.”
24 H.R. Rep. No. 104-469, pt. 1, at 229; see also H.R. Rep. No. 104-828, at 210 (same).
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1 If Ms. Gonzalez Rodriguez would have been eligible to request a bond before the
2 passage of IIRIRA, and Congress did not alter the Attorney General's power to grant
3 a bond by passing IIRIRA, it follows that she is eligible to request a bond now.

4 **35.** The documents in the bond record do not show that Respondent is either a danger or
5 a flight risk. She has resided in the United States without incident for roughly 30 years
6 prior to her arrest for a misdemeanor speeding charge. She has been a wonderful and
7 supportive mother to her daughter [REDACTED] who is just starting college. These
8 proceedings have taken a significant psychological toll on [REDACTED] as well. See Exh. F,
9 Medical Records for [REDACTED]. Ms. Gonzalez Rodriguez is involved in her community
10 and an active member of her church. Under a proper interpretation of the law, she would
11 be allowed to litigate her case outside of detention or at least be entitled to ask for the
12 opportunity to do so.
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14 CLAIMS FOR RELIEF

15 **36.** Ms. Gonzalez Rodriguez re-alleges and incorporates by reference each and every
16 allegation contained in paragraphs 1-35, as if set forth herein.

17 **37.** Respondents' interpretation of 8 U.S.C. § 1225(b) violates Ms. Gonzalez Rodriguez's
18 substantive due process right to liberty because it allows the government to infringe
19 on her fundamental liberty interests through a process that is not narrowly tailored to
20 meet the compelling government interest of protecting public safety.
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22 EXHAUSTION OF ADMINISTRATIVE REMEDIES

23 **38.** Exhaustion is not mandated in this case since neither INA § 236, 8 U.S.C. § 1226,
24 nor the federal review provisions of INA § 242, 8 U.S.C. § 1252, require the Petitioner
25 to exhaust administrative remedies for purposes of challenging the constitutionality of
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1 regulations allegedly implemented under bond proceedings under INA § 236(c), 8
2 U.S.C. § 1226(c).

3 **39.** The exhaustion requirements under INA § 242(d)(1), 8 U.S.C. § 1252(d)(1), are
4 inapplicable to bond challenges. *National Center for Immigrants Rights, Inc. v. INS*, 791
5 F.2d 1351 (9th Cir. 1986), vacated on other grounds, 481 U.S. 1009 (1987), reaffirmed,
6 913 F.2d 1350 (9th Cir. 1990), vacated on other grounds, 502 U.S. 183 (1991).

7 **40.** Exhaustion of administrative remedies before the filing of this writ is not necessary,
8 since the Petitioner has raised constitutional issues concerning his detention. The
9 administrative forum "...provide[s] no real opportunity to present...constitutional issues
10 requiring exhaustion." *Legalization Assistance Project v. INS*, 976 F.2d 1198, 1203 (9th
11 Cir. 1992).

12 **41.** Exhaustion is not necessary where raising the issues presented in this writ to the
13 immigration court would be futile and moot. *American-Arab Anti-Discrimination*
14 *Committee v. Reno*, 70 F.3d 1045, 1058 (9th Cir. 1995) rev'd on other grounds, 119
15 S.Ct. 936 (1999).

16 **42.** The exhaustion requirement is not a jurisdictional prerequisite but a matter committed
17 to the "sound discretion of the trial court." See *NLRB v. Industrial Union of Marine*
18 *and Shipbuilding Workers*, 391 U.S. 418, 426 n.8 (1968). Respondents have issued
19 a published decision interpreting 8 U.S.C. § 1225 which they intend to apply nationwide
20 and in all cases with similar facts to Petitioner's. See *Yajure Hurtado*, 29 I&N Dec. at
21 216.

22 **43.** Such regulations are plainly contrary to Ms. Gonzalez Rodriguez's statutory,
23 regulatory, and constitutional rights to due process, which this Honorable Court should
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1 review without delay; and thus, this is a matter ripe for the "sound discretion of the
2 trial court." See *NLRB v. Industrial Union of Marine and Shipbuilding Workers*, 391
3 U.S. 418, 426 n. 8 (1968).

4 **44.** Finally, a record of administrative appeal is not germane to the purely legal issue of
5 whether Respondents' interpretation of 8 U.S.C. § 1225 is arbitrary, capricious,
6 contrary to law, or violates Ms. Gonzalez Rodriguez's statutory, regulatory, and due
7 process rights.

8 **REQUEST FOR RELIEF**

9 **45.** The Petitioner herein respectfully requests that this Court enter the following findings
10 and order the following relief:

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- 12 1) Issue an order restraining the Respondents from attempting to move Ms.
13 Gonzalez Rodriguez from the State of Arizona while this petition is pending;
 - 14 2) Issue an order requiring the Respondents to provide seventy-two hours' notice of
15 their intent to move her;
 - 16 3) Grant a writ of Habeas Corpus, directed to the Respondents, requiring them to
17 either release Ms. Gonzalez Rodriguez immediately or hold a bond hearing
18 pursuant to 8 U.S.C. § 1226;
 - 19 4) Declare that Ms. Gonzalez Rodriguez's continued detention is arbitrary and
20 capricious and violates the INA, its implementing regulations, and Due Process
21 Clause of the Fifth Amendment to the United States Constitution;
 - 22 5) Award Ms. Gonzalez Rodriguez and her counsel reasonable costs and attorney's
23 fees incurred as a result of bringing this action, pursuant to the Equal Access to
24 Justice Act, 28 U.S.C. § 2412; and
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6) Grant any further relief that this Court may deem fit, just, and proper.

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Dated: October 21, 2025

Respectfully submitted,

/s/Ray A. Ybarra Maldonado
Ray A. Ybarra Maldonado
Attorney for Petitioner
Silveria Gonzalez Rodriguez

VERIFICATION

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I, Ray A. Ybarra Maldonado, hereby declare under penalty of perjury of the laws of the State of Arizona and the United States that the facts alleged in the foregoing Verified Petition for a Writ of Habeas Corpus are to the best of my knowledge true and correct.

Executed on this 21st day of October, 2025 in Phoenix, Arizona.

/s/Ray A. Ybarra Maldonado
Ray A. Ybarra Maldonado
Attorney for Petitioner
Silveria Gonzalez Rodriguez

Civil Cover Sheet

This automated JS-44 conforms generally to the manual JS-44 approved by the Judicial Conference of the United States in September 1974. The data is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. The information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is authorized for use only in the District of Arizona.

The completed cover sheet must be printed directly to PDF and filed as an attachment to the Complaint or Notice of Removal.

Plaintiff(s): **Silveria Gonzalez Rodriguez , ;**

Pamela Bondi , Attorney General of the United States; Kristi Noem , Secretary of the Department of Homeland Security; Daren K. Margolin , Director of the Executive Office for Immigration Review; John Cantu , Phoenix Field Office Director;

County of Residence: Pinal

County of Residence: Outside the State of Arizona

County Where Claim For Relief Arose: Pinal

Plaintiff's Atty(s):

Defendant's Atty(s):

Ray Anthony Ybarra Maldonado ,
Ybarra Maldonado Law Group
PO Box 551
Phoenix, AZ 85001
6029104040

IFP REQUESTED

REMOVAL FROM COUNTY, CASE #

II. Basis of Jurisdiction: **2. U.S. Government Defendant**

III. Citizenship of Principal Parties(Diversity Cases Only)
3 Citizen of Foreign Country

Plaintiff:-
2 Citizen of Another State

Defendant:-
1. Original Proceeding
463 Alien Detainee

IV. Origin :
V. Nature of Suit:
VI.Cause of Action: **28 USC 2241; Article 1, Sec. 9 U.S. Constitution, 28 USC 1331, Due Process Rights to get affairs in order**

VII. Requested in Complaint
No

Class Action:
None

Dollar Demand:
No

Jury Demand:

VIII. This case IS RELATED to Case Number **N/A** assigned to Judge **N/a.**

Signature: s/ Ray A. Ybarra Maldonado

Date: 10/21/2025

Case 2:25-cv-03917-JJT--DMF Document 1-2 Filed 10/21/25 Page 2 of 2

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Revised: 01/2014