

MARIELA ALATORRE RODRIGUEZ

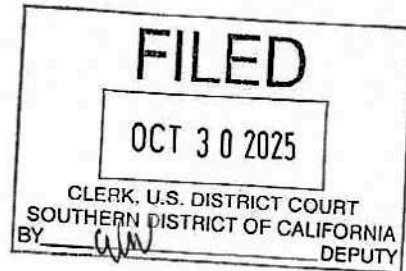
NAME

[REDACTED]
PRISON NUMBER

OTAY MESA DETENTION CENTER

PLACE OF CONFINEMENT

7488 CALZADA DE LA FUENTE, SAN DIEGO, CA 92154
ADDRESS



**United States District Court
Southern District Of California**

MARIELA ALATORRE RODRIGUEZ

(FULL NAME OF PETITIONER)

Petitioner

v.

Christopher J. LaRose, Senior Warden,
(NAME OF WARDEN, SUPERINTENDENT, JAILOR, OR AUTHORIZED
PERSON HAVING CUSTODY OF PETITIONER, E.G. PAROLE OFFICER)

Respondent

and DHS Secretary Kristi Noem, US Atty General
Pamela Bondi, ICE Acting Director Todd Lyons, San
Diego ICE Field Officer Director Gregory J.
Archambeault, US ICE, US DHS.

'25CV2940 RBM JLB

(TO BE FILLED IN BY CLERK OF U.S. DISTRICT COURT)

PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

1. Are you currently:

- ☐ A pretrial detainee (waiting for trial on criminal charges)
- ☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime

If you are currently serving a sentence, provide:

- (a) Name and location of court that sentenced you:

I am in Removal Proceedings before the Otay Immigration Court. An Immigration Judge granted me bond. See Enclosed Decision. DHS appealed the Judge's bond Decision. DHS' bond appeal automatically stopped my release. The bond appeal is pending before the Board of Immigration Appeals.

(b) Docket or case number (if you know): A200-626-193 _____

(c) Date of sentencing: n / a _____


■ Being held on immigration charge

Other (explain): I am in Removal Proceedings before the Otay Immigration Court. My Removal case is pending. An Immigration Judge denied my bond request. According to the Immigration Judge, he did not have jurisdiction. See Enclosed Decision.

According to the Immigration Judge, I am subject to mandatory detention under 8 U.S.C. § 1225, *Matter of Q Li*, 29 I&N Dec. 66 (BIA 2025) and *Matter of Yajure-Hurtado*, 29 I&N Dec. 216 (BIA 2025).

But I am not subject to 8 U.S.C. § 1225. I am subject to 8 U.S.C. § 1226. See for example, *Ortega-Cervantes v. Gonzales*, 501 F.3d 1111 (9th Cir. 2007) (alien caught entering without admission was released under Section 236's conditional parole, not 212, because the government did not process him under Section 235); *Matter of Cabrera-Fernandez*, 28 I&N Dec. 747 (BIA 2023) (applicants "for admission who are released on conditional parole rather than humanitarian parole have not been "inspected and admitted or paroled"); *Matter of D-J*, 23 I&N Dec. 572 (A.G. 2003) (when aliens enter evading the authorities, Immigration Judges have authority over Section 236 bond proceedings); *Matter of Castillo-Padilla*, 25 I&N Dec. 257 (BIA 2010) (unadmitted entrant caught years after entry was released by ICE under Section 236, not 212); Also *Torres v. Barr*, 976 F.3d 918, 930 (9th Cir. 2020) (illegal entrants are not perpetually applicants for admission); Also *TRW Inc. v. Andrews*, 534 U.S. 19, 29 (2001) (when a statute permits of two interpretations, we generally adopt the interpretation that avoids depriving another statute of practical effect); *United States v. Castleman*, 572 U.S. 157, 178, 134 S.Ct. 1405, 188 L.Ed.2d 426 (2014) (the presumption against ineffectiveness means that Congress presumably does not enact useless laws).

Most federal courts already rejected DHS' position. See for example, Ninth Circuit: *Cuevas Guzman v. Andrews*, 2025 WL 2617256, at 3 n.4 (E.D. Cal. Sept. 9, 2025) (distinguishing *Yajure Hurtado*); *Caicedo Hinestroza v. Kaiser*, 2025 WL 2606983 (N.D. Cal. Sept. 9, 2025); *Zaragoza Mosqueda v. Noem*, 2025 WL 2591530, at *7 (C.D. Cal. Sept. 8, 2025) (noting that BIA's decision in *Yajure Hurtado* renders requiring prudential exhaustion futile); *Hernandez Nieves v. Kaiser*, 2025 WL 2533110 (N.D. Cal. Sept. 3, 2025); *Vasquez Garcia et al. v. Noem*, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Arrazola-Gonzalez v. Noem*, 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Rosado v. Figueroa*, 2025 WL 2337099 (D. Ariz. Aug. 11, 2025); *Rodriguez Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025). First Circuit: *Sampiao v. Hyde*, 2025 WL 2607924 (D. Mass. Sept. 9, 2025) (noting court's disagreement with BIA's analysis in *Yajure Hurtado*); *Jimenez v. FCI Berlin, Warden*, No. 25-cv-326-LM-AJ (D.N.H. Sept. 8, 2025); *Doe v. Moniz*, 2025 WL 2576819 (D. Mass. Sept. 5, 2025); *Romero v. Hyde*, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Martinez v. Hyde*, 2025 WL 2084238 (D. Mass. July 24, 2025); *dos Santos v. Noem*, 2025 WL 2370988 (D. Mass. Aug. 14, 2025); *Gomes v. Hyde*, 2025 WL 1869299 (D. Mass. July 7, 2025). Second Circuit: *Lopez Benitez v. Francis*, 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Samb v. Joyce*, 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025). Fourth Circuit: *Leal-Hernandez v. Noem*, 2025 WL 2430025 (D. Md. Aug. 24, 2025). Fifth Circuit: *Kostak v. Trump*, 2025 WL 2472136 (W.D. La. Aug. 27, 2025). Sixth Circuit: *Pizarro Reyes v. Raycraft*, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025) (disagreeing with BIA's analysis in *Yajure Hurtado*); *Lopez-Campos v. Raycraft*, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025). Eighth Circuit: *Carmona-Lorenzo v. Trump*, 2025 WL 2531521 (D. Neb. Sept. 3, 2025); *Cortes Fernandez v. Lyons*, 2025 WL 2531539 (D. Neb. Sept. 3, 2025); *Palma Perez v. Berg*, 2025 WL 2531566 (D. Neb. Sept. 3, 2025); *O.E. v. Bondi*, 2025 WL 2466670 (D. Minn. Aug. 27, 2025); *Jacinto v. Trump*, 2025 WL 2402271 (D. Neb. Aug. 19, 2025); *Maldonado v. Olson*, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Garcia Jimenez v. Kramer*, 2025 WL 2374223 (D. Neb. Aug. 14, 2025); *Anicasio v. Kramer*, 2025 WL 2374224 (D. Neb. Aug. 14, 2025).

2. Are you currently being held on orders by:
☒ Federal authorities ☐ State authorities ☐ Other - explain:
Currently being held by the Immigration and Customs Enforcement / DHS.
3. What are you challenging in this petition:
☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities
☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed
☐ Disciplinary proceedings
☒ Other (specify): The newly imposed mandatory detention policy under Matter of Q Li and Matter of Yahure-Hurtado.
4. Provide more information about the decision or action you are challenging:
- (a) Name and location of the court or agency: I am currently at the Otay Mesa Detention Center. I am challenging DHS' and the Executive Office of Immigration Review's new policy of mandatory detention.
- (b) _____
- (c) Case number, docket number or opinion number (if you know):
A 
- (d) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed): The mandatory detention pursuant to 8 U.S.C. § 1225.
- (e) _____
- (f) Date of the decision or action: 10/24/2025.
- (g) _____
5. Did you **appeal** the decision, file a grievance or seek an administrative remedy?
☐ Yes ☒ No (an appeal would be futile and frivolous, because under the Board of Immigration Appeals' new policy, people who enter without admission are subject to mandatory detention; and that is what I am challenging).
- (a) If your answer to 5 was "Yes," give the following information:
- (1) Name of court, agency or authority: _____
- (2) Date of filing: _____
- (3) Case number, docket number or opinion number: _____

- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____
- _____
- _____
- _____
- _____

- _____
- (b) If your answer to 5 was "No," explain why you did not appeal: an appeal would be futile and frivolous, because under the Board of Immigration Appeals' new policy, people who enter without admission are subject to mandatory detention; and that is what I am challenging. _____
- _____

6. After the first appeal, did you file a **second appeal** to a higher authority, court or agency?

☐ Yes ☐ No (n/a)

- (a) If your answer to 6 was "Yes," give the following information:

- (1) Name of court, agency or authority: n / a _____
- (2) Date of filing: _____
- (3) Case number, docket number or opinion number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____
- _____
- _____
- _____

- (b) If your answer to 5 was "No," explain why you did not appeal: _____
- _____

7. After the second appeal, did you file a **third appeal** to a higher authority, agency or court?

☐ Yes ☐ No N/A

- (a) If your answer to 7 was "Yes," give the following information:

- (1) Name of court, agency or authority: n / a _____
- (2) Date of filing: _____
- (3) Case number, docket number or opinion number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____
- _____

- (b) Did you present Ground One in all appeals that were available to you?
☐ Yes ☒ No (I did not appeal, for the reasons stated above, i.e., futility.

GROUND TWO: My mandatory detention violates the Administrative Procedure Act, 5 U.S.C. § 706(2).

- (a) **Supporting FACTS** (state *briefly* without citing cases or law): For decades, the immigration system and federal courts consistently held that 8 U.S.C. § 1226(a) applied in situations like mine. See for example, *Ortega-Cervantes v. Gonzales*, 501 F.3d 1111 (9th Cir. 2007); *Matter of Cabrera-Fernandez*, 28 I&N Dec. 747 (BIA 2023); *Matter of D-J*, 23 I&N Dec. 572 (A.G. 2003); *Matter of Castillo-Padilla*, 25 I&N Dec. 257 (BIA 2010); *Torres v. Barr*, 976 F.3d 918, 930 (9th Cir. 2020). Now, the BIA erroneously and without any basis applies 8 U.S.C. § 1225 to all unadmitted aliens. This new policy subjects all unadmitted aliens to mandatory detention. This new mandatory detention policy clearly violates the law.

(b) Did you present Ground Two in all appeals that were available to you?

☐ Yes ☒ No (the BIA does not entertain constitutional questions or APA questions. Plus according to the BIA, I am subject to mandatory detention. As I stated above, an appeal to the BIA is futile and frivolous).

GROUND THREE: My mandatory detention violates my Fifth Amendment Right to Due Process. _____

(a) **Supporting FACTS** (state *briefly* without citing cases or law): My mandatory detention is based on an unconstitutional policy, a clearly erroneous interpretation of law, and contrary to clear precedent. The new policy deprives me of my liberty. I have no criminal record. I am contributing member of society. I care for elderly people; and I really care about them. _____

(b) Did you present Ground Three in all appeals that were available to you?

☐ Yes ☒ No (under the futility theory)

GROUND FOUR: n/a

(a) Supporting FACTS (state *briefly* without citing cases or law):

(b) Did you present Ground Four in all appeals that were available to you?

☐ Yes ☐ No N/A

9. If any of the grounds listed in 4A, B, C, and D were not previously presented in any other court, state or federal, state briefly what grounds were not presented, and give your reasons for not presenting them:

The Administrative Procedure Act, 5 U.S.C. § 706(2) and the Fifth Amendment Right to Due Process issues,
because the BIA does not entertain those claims.

10. Do you have any petition or appeal now pending in any court, either state or federal, as to the execution of sentence under attack?
☐ Yes ☒ No
11. Give the name and address, if known, of each attorney who represented you in the following stages of the execution of sentence attacked herein:
- (a) In any post-conviction proceeding: Isaac Rodriguez in Immigration Court. _____
- (b) On appeal from any adverse ruling in a post-conviction proceeding n/a _____

Wherefore, petitioner prays that the Court grant petitioner relief to which he may be entitled in this proceeding.

SIGNATURE OF ATTORNEY (IF ANY)

I declare under penalty of perjury that the foregoing is true and correct. Executed on

10/29/25
(DATE)

Mateo Slatts Rodriguez
SIGNATURE OF PETITIONER



UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
OTAY MESA IMMIGRATION COURT

Respondent Name:

ALATORRE-RODRIGUEZ, MARIELA

To:

Rodriguez, Isaac B



A-Number:



Riders:

In Custody Redetermination Proceedings

Date:

10/24/2025

ORDER OF THE IMMIGRATION JUDGE

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

- ☒ Denied, because
No jurisdiction. Matter of Jonathan Javier YAJURE HURTADO, 29 I&N Dec. 216 (BIA 2025)
- ☐ Granted. It is ordered that Respondent be:
- ☐ released from custody on his own recognizance.
 - ☐ released from custody under bond of \$
 - ☐ other:
- ☐ Other:

Guy Grande

Immigration Judge: Grande, Guy 10/24/2025

Appeal: Department of Homeland Security: ☒ waived ☐ reserved
Respondent: ☒ waived ☐ reserved
Appeal Due:

Certificate of Service

This document was served:

Via: [M] Mail | [P] Personal Service | [E] Electronic Service | [U] Address Unavailable

To: [] Alien | [] Alien c/o custodial officer | [E] Alien atty/rep. | [E] DHS

Respondent Name : ALATORRE-RODRIGUEZ, MARIELA | A-Number : 

Riders:

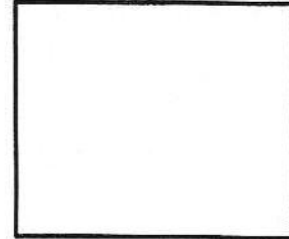
Date: 10/24/2025 By: GONZALEZ, EMELY, Court Staff

NOT FOR PUBLICATION

U.S. Department of Justice
Executive Office for Immigration Review
Board of Immigration Appeals

MATTER OF:

Respondent



ON BEHALF OF RESPONDENT: Isaac B Rodriguez, Esquire

ON BEHALF OF DHS: Tracie A. Klein, Assistant Chief Counsel

IN BOND PROCEEDINGS

On Appeal from a Decision of the Immigration Court, Otay Mesa, CA

Before: Gallow, Appellate Immigration Judge

GALLOW, Appellate Immigration Judge

The Department of Homeland Security ("DHS") appeals the Immigration Judge's decision ordering the respondent released from custody upon posting a \$1,500 bond. The Immigration Judge issued a bond memorandum setting forth the reasons for the decision on August 20, 2025. The appeal will be sustained.

We review findings of fact determined by an Immigration Judge, including credibility findings, under a "clearly erroneous" standard. 8 C.F.R. § 1003.1(d)(3)(i). We review questions of law, discretion, and judgment, and all other issues in appeals from decisions of Immigration Judges under the de novo standard. 8 C.F.R. § 1003.1(d)(3)(ii).

During the pendency of this appeal, the Board issued a precedential decision holding that, based on the plain language of section 235(b)(2)(A) of the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1225(b)(2)(A), Immigration Judges lack the authority over bond requests for aliens who are present in the United States without admission. *See Matter of Yajure Hurtado*, 29 I&N Dec. 216, 220-28 (BIA 2025). The respondent does not dispute that he is present in the United States without admission and the administrative record establishes that he is charged as inadmissible under section 212(a)(6)(A)(i) of the INA, 8 U.S.C. §§ 1182(a)(6)(A)(i) (IJ at 2-3; Exh. 1). While the respondent raises various arguments in his brief before the Board including that he has been in the United States for more than 2 years, we determined in *Matter of Yajure Hurtado* that the statutory text of the INA is "clear and explicit in requiring mandatory detention of all aliens who are applicants for admission, without regard to how many years the

alien has been residing in the United States without lawful status.”¹ *Matter of Yajure Hurtado* at 226.

Pursuant to the Board’s decision in *Matter of Yajure Hurtado*, the Immigration Judge lacks authority to hear the respondent’s request for custody redetermination because the respondent is an applicant for admission and is subject to mandatory detention under section 235(b)(2)(A) of the INA, 8 U.S.C. § 1225(b)(2)(A), and 8 C.F.R. § 235.3(b)(1)(ii). Based on the foregoing, we will sustain DHS’ appeal and vacate the Immigration Judge’s decision.

Accordingly, the following orders will be entered.

ORDER: DHS’ appeal is sustained.

FURTHER ORDER: The Immigration Judge’s decision ordering the respondent released on bond is vacated.

FURTHER ORDER: The respondent is ordered detained without bond.

¹ To the extent that the respondent argues that *Matter of Yajure Hurtado* was wrongly decided, the respondent does not raise a constitutional claim regarding the underlying statutory text, and we decline to reconsider or overturn our decision in that case, which is binding in this case. See *Matter of Garcia*, 28 I&N Dec. 693, 695 (BIA 2023) (explaining that Immigration Judges and the Board “are bound to follow the precedent of this Board, the Attorney General, and the circuit court of appeals with jurisdiction over the geographic region where a case occurs”).

THIS NOTICE DOES NOT GRANT ANY IMMIGRATION STATUS OR BENEFIT.

NOTICE TYPE Receipt		NOTICE DATE August 18, 2025	
CASE TYPE I-817, Application for Family Unity Benefits		USCIS ALIEN NUMBER A [REDACTED]	
RECEIPT NUMBER [REDACTED]	RECEIVED DATE August 14, 2025	PAGE 1 of 1	
		DATE OF BIRTH [REDACTED]	
<p>MARIELA ALATORRE RODRIGUEZ C/O LESLIE G. SANTOS UNION LAW GROUP APC 1805 NEWTON AVENUE SAN DIEGO, CA 92113</p> <p>00002169</p> <p> </p>		<p>PAYMENT INFORMATION:</p> <p>Application/Petition Fee: \$760.00 Total Amount Received: \$760.00 Total Balance Due: \$0.00</p>	
<p>NAME AND MAILING ADDRESS</p> <p>We have received your form and are currently processing the above case. If this notice contains a priority date, this priority does not reflect earlier retained priority dates. We will notify you separately about any other case you filed.</p> <p>If we determine you must submit biometrics, we will mail you a biometrics appointment notice with the time and place of your appointment.</p> <p>If you have questions or need to update your personal information listed above, please visit the USCIS Contact Center webpage at uscis.gov/contactcenter to connect with a live USCIS representative in English or Spanish.</p>			
USCIS Office Address: USCIS Texas Service Center 6046 N. Bellline Rd STE. 110 Irving, TX 75038		USCIS Contact Center Number: (800)375-5283 ATTORNEY COPY 	

If you are visiting a field office and need directions, including public transportation directions, please see www.uscis.gov/fieldoffices for more information.

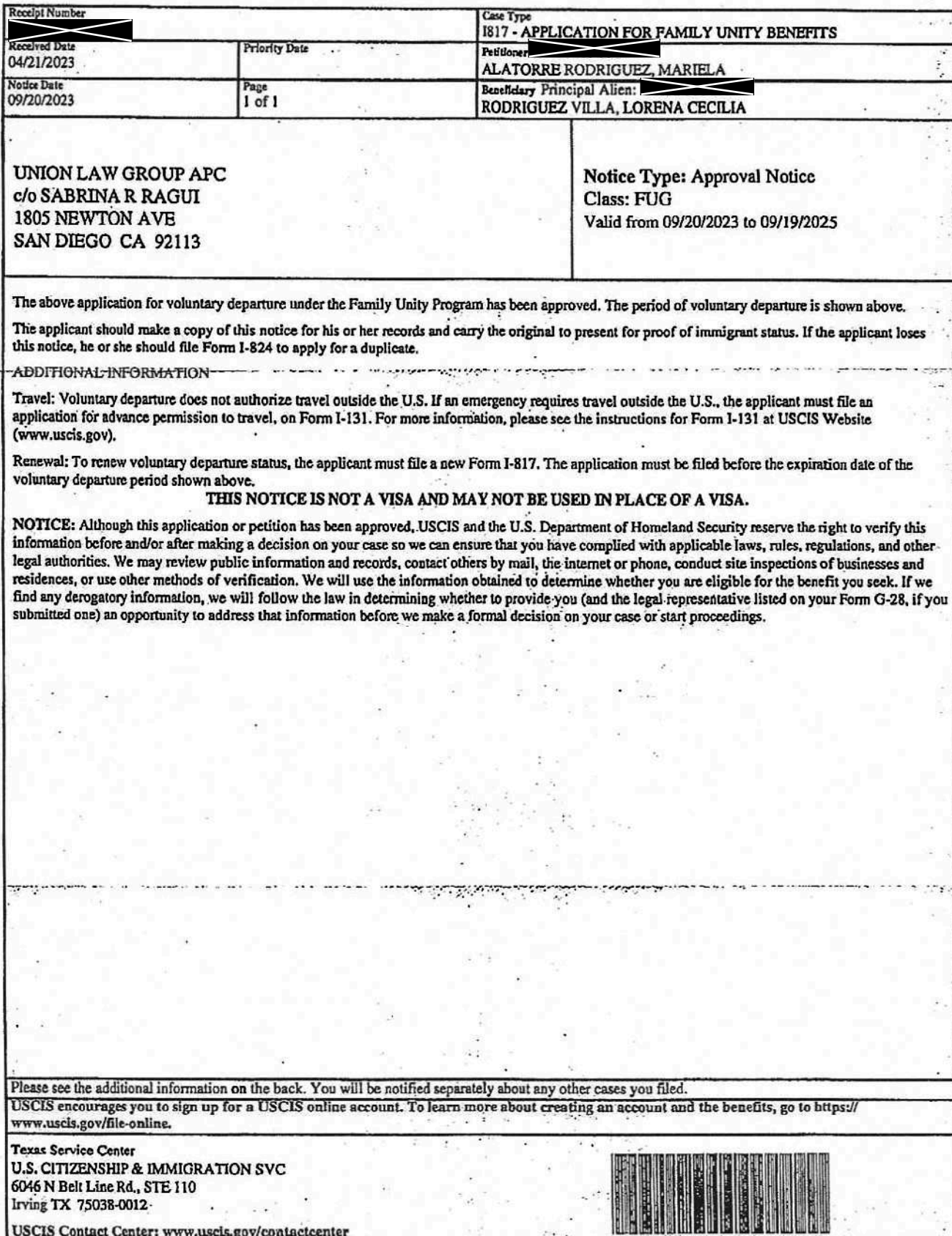
Notice for Customers with Disabilities

To request a disability accommodation:

- Go to uscis.gov/accommodations to make your request online, or
- Call the USCIS Contact Center at 1-800-375-5283 (TTY 1-800-767-1833) for help in English or Spanish.

If you need a sign language interpreter, make your request as soon as you receive your appointment notice. The more advance notice we have of your accommodation request, the better prepared we can be and less likely we will need to reschedule your appointment. For more information about accommodations, visit uscis.gov/accommodationsinfo.

DEPARTMENT OF HOMELAND SECURITY
U.S. CITIZENSHIP AND IMMIGRATION SERVICES



ADDITIONAL INFORMATION FOR APPLICANT/PETITIONER

Please save this Form I-797, Notice of Action (approval notice) for your records. Please note that simply filing an application, petition or request, or having an approved petition does not give the person it was filed for (also known as the beneficiary) permission to legally enter the United States. It also does not grant any legal immigration status.

Include a copy of this notice if you:

- Write to USCIS or a U.S. Consulate about your case or
- File another application or petition with USCIS based on this decision.

USCIS will notify you separately about any other applications or petitions you have filed.

Inquiries

If you have questions about your application or petition, you may:

- Go to <https://egov.uscis.gov/casestatus> to check your case status online.
- Call the National Customer Service Center at 1-800-375-5283.
- Telecommunications Device for the Deaf (TDD): 1-800-767-1833.
- Send us a letter and include a copy of this notice.
- Schedule an appointment at a local USCIS office using InfoPass at <https://infopass.uscis.gov>.

If you filed Form I-907, Request for Premium Processing Service, and you have any questions about your application or petition, please follow the instructions for contacting the Premium Processing Unit printed on the receipt notice we mailed you.

APPROVAL OF A NONIMMIGRANT PETITION

If we approved a nonimmigrant petition, it means that the beneficiary is eligible for the requested nonimmigrant classification. If this notice says that we are notifying a U.S. Consulate about the approval for the purpose of issuing a visa, contact the appropriate U.S. Consulate directly if you or the beneficiary has questions about the process.

APPROVAL OF AN IMMIGRANT PETITION

An approved immigrant petition does not grant any legal immigration status or guarantee that the beneficiary will receive a visa or an adjustment of status. The approved petition means the beneficiary can:

- Apply for an immigrant or fiancé(e) visa if he or she is outside the United States, or
- Apply for adjustment of status as a permanent resident if he or she is already in the United States.

If this notice states we approved your immigrant petition and forwarded it to the National Visa Center (NVC), the NVC will directly contact the beneficiary with information about how to apply for a visa. If any changes occur that could affect visa eligibility, visit the NVC website at <http://nvc.state.gov/ask> to find contact information and a public inquiry form.

For more information about obtaining Lawful Permanent Residence status and a Green Card, visit our website at www.uscis.gov.

Jamul, CA

September 24, 2025

To Whom It May Concern,

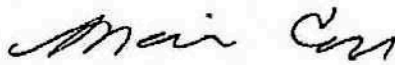
My name is Maria Coss, and I am a United States citizen living in Jamul, California. I am Mariela Alatorre's oldest sister, and I have been part of her life since the day she was born. I am writing to support her release on bond and to offer myself as a sponsor.

Mariela is a kind, generous, and deeply caring person. She is a devoted mother of two small children who rely on her for love and stability. As an elementary school teacher in the Chula Vista Elementary School District, I know the importance of strong family support, and I see those values clearly in Mariela's life.

I am willing and able to provide financial assistance to help Mariela meet any conditions of her release. I will also be available to help her stay on top of any legal obligations and ensure she attends all required court appearances.

Mariela is not a flight risk, and she has a strong network of family ready to support her. I respectfully ask that she be given the opportunity to return to her children and continue contributing to her family and community.

Sincerely,



Maria Coss



Maria.Coss@cvesd.org

Sister



To whom it may concern:

I have the privilege to know Mariela Alatorre for around 10 years. In my line of work as a caregiver I have referred her to a family to also become a caregiver. Over the years she has proven to me and the family whom she works for, that she is reliable, trustworthy, and hardworking person. She is an amazing friend, mother, sister, and family member.

For any questions don't hesitate to contact me

JULIETA XUM via email: julietaxum@gmail.com

Or at



Memorandum in Support of Mariela Alatorre Rodriguez's Status as a Lawful Resident of the USA.

I, Steven M. Boudreau, present this declaration to whom it may concern, regarding the status of Ms. Rodriguez as a lawful resident of the USA. I am a citizen of the USA, and I reside in San Diego County, California. I am 75 years old. A copy of my current California DMV license is attached.

1. I have personally known Ms. Rodriguez for approximately 9 years in her capacity as a home health aide to Mrs. Odilia Snodgrass. Mrs. Snodgrass is 86-years-old and the aunt of my spouse. My spouse and I provide personal household management oversight for the welfare of Ms. Snodgrass. We were involved in hiring Ms. Rodriguez. We have been in weekly contact with her since she began assisting Ms. Snodgrass.
2. I have personal knowledge of the abilities of Ms. Rodriguez as a caretaker. I can attest to the excellence of the care she provides to Mrs. Snodgrass concerning general health issues, sanitation, exercise, mental stimulation; and as her communicator when conversing with doctors and other healthcare providers who care for Mrs. Snodgrass. In all of these service categories she excels.
3. Ms. Rodriguez possess a California Driver's License and often acts as the principal auto transport provider for Mrs. Snodgrass when she goes out for her many doctor's office visits, shopping for essentials, family visits, and business matters. When performing such duties she drives a fully insured, and professionally maintained automobile owned by Mrs. Snodgrass.
4. Ms. Rodriguez has two young children both of whom are very well acquainted with Mrs. Snodgrass by way of meetings at her place of residence, and via "Zoom" video meetings. I know that Mrs. Snodgrass treasures the times she is able to enjoy with these two very lively, polite and loving children. I understand that both boys were born in the USA (San Diego County).
5. I am an attorney licensed by the state of California. The status of my license is "Inactive". I have not provided legal services to Ms. Rodriguez. I personally believe that any failure on the part of Ms. Rodriguez to appear at any past appointment with the USA Immigration authorities was not due to intentional careless behavior on her part. She, through no fault of her own, did not receive a notice of a hearing requiring her presence until after the hearing date had passed. Since learning of her failure to appear she has done all that she can to comply with all subsequent official directives she has been given, including the wearing an ankle location monitor device.
6. Ms. Rodriguez has now replaced her former attorney and has engaged new counsel. My belief is that with competent council now assisting her Ms. Rodriguez she will be compliant, responsive and timely regarding all appointments with Immigration authorities.
7. I have spent hundreds of hours with Mrs. Rodriguez. I know her to be hardworking, honest, compassionate and respectful of the USA. I am ready to speak with anyone who is examining this statement so that I might be allowed to add to, and possibly clarify all statements of fact contained herein. Ms. Rodriguez is a person of truly noble character, and the devoted mother of two minor sons who are citizens of this Nation. I truly hope that one day soon I will be standing with her when she is made a citizen of the USA.

Respectfully submitted,


Steven M. Boudreau





Support Letter

San Diego, CA

September 24, 2025

To whom it may concern:

I, Adriana Velazquez, currently residing at [REDACTED], am writing this letter in support of Mariela Alatorre, who is currently in immigration custody.

I have known Mariela Alatorre for 9 years, and I can personally attest to her character. She is hardworking, caring, selfless individual who has always been committed to her family and her community. She plays an important role for her two young children and is a great mother. She is family oriented, hardworking, and an exemplary individual.

I am willing to provide emotional, moral support, and anything in my willpower to support her through this process. I fully trust that she will be present during all her court processing's and will take the steps necessary resolve her situation.

I thank you in advance for your attention and consideration.

Sincerely,

Adriana Velazquez

Adriana Velazquez

[REDACTED]

adriana0395@gmail.com

Family Friend

To whom it may concern,

My name is Angela Steinberg and I have worked with Mariela Alatorre for over two years. She as caregiver and myself as a bookkeeper for Odilia.

She is a lifeline for Odilia. She is there for her nearly 7 hours a day, six days a week. Odilia is 88 years old and needs assistance to get around, to get dressed, and many tasks.

I do the payroll for Odilia and Mariela has Federal, State and FICA paid with her paycheck.

She has two young boys that are citizens of the US. She is a contributing member of our community. A good person.

Please consider her allowance to stay in San Diego.

Angela Steinberg



San Diego, California
09-24-25

To Whom it may Concern:

I, Susan Boudreau, currently residing at [REDACTED], am writing this letter in support of Mariela Alatorre Rodriguez, who is currently in immigration custody.

I have known Mariela for 9 years. I met her when we needed to find an attendant to help my elderly aunt. We could not believe our good fortune in finding Mariela. She and my Aunt were fast friends.

I can attest to her fine character and honesty. She is hardworking and has a pleasant and caring personality. I'm honored to know her.

As the years have gone by my aunt has needed more advanced skilled care, and Mariela has been educated to use a urinary catheter, manage her meds and take her to her doctor's appointments.

Mariela has started her family with two young boys since we first met her. They are lovely children and my aunt loves them dearly. Mariela is a wonderful mom handling her busy schedule with grace.

I am fully willing to support her emotionally and morally throughout this process, and I am confident she will comply with all immigration requirements and court dates if released. Mariela has a large family

and friend support group living near by ready to help in any way. She is not a flight risk.

Thank you for your time and consideration.

Sincerely,

Susan Boudreau

[REDACTED]

suebou@san.rr.com

I am the niece of Mariela's employer Odilia Snodgrass



La Mesa, California
9/24/25

To whom it may concern,

I Brenda Teresa Chavarin, currently residing at [REDACTED] am writing this letter in support of Mariela Alatorre Rodriguez, who is currently in immigration custody.

My sister Mariela Alatorre Rodriguez is a person of great character. She is a great mother to her two small children ages 4 and 2 yrs old. She works hard to provide for her children. She is the type of person that will always come to help those who are in need. She is so important in our family, her nieces and nephews are close to her and admire her so much.

I am fully willing to support Mariela Alatorre Rodriguez emotionally and morally throughout this process, and I am confident that she will comply with all immigration requirements and court dates if released.

Thank You for your time and consideration

Sincerely,

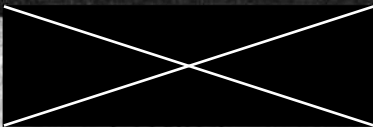
Brenda T. Chavarin

Brenda T. Chavarin

Phone #: [REDACTED]

Email: Chavarinb@yahoo.com




September 24, 2025
To whom it may concern:


Mariela Alatorre ^{Rodriguez} is a home health aide to my sister, Odilia Snodgrass, age 86. She has always gone above and beyond in times of emergency and in every way on a daily basis. I could always count on Mariela to be there when needed.

She is an adoring mother to her two boys who are wonderful children.

I would miss her terribly if she could not take care of my sister as would my sister.

Sincerely,

Maria Y. Lincoln

P.S. Mariela has been an aide to my sister for 8-9 yrs first at my sister's home at , and now at Try Park at Bonita rd, 3302 Bonita Rd, Chula Vista, CA privately



Mrs F. Kiehl

Sent from my iPad



Basehor, Kansas

September 25, 2025

To Whom It May Concern,

I, Alma Lorena Coss, currently residing at [REDACTED] am writing this letter in strong support of Mariela Alatorre, who is currently in immigration custody.

I have known Mariela Alatorre for 30 years and I can personally attest to her character. She is hardworking, honest and caring individual who has always been committed to her family and community. She plays an important role in the lives of her family members such as her siblings, parents but most of all her children. Mariela has always shown a strong sense of responsibility and deep commitment when it comes to her family.

Thank you for your time and attention to this matter. Please feel free to contact me if any additional information is required.

Sincerely,

Alma Coss

May 3, 2025

To Whom It May Concern:

My name is Janet Mesa and I am a United States citizen. I am currently a middle school special education teacher for Sweetwater Union High School district. I am writing this letter on behalf of Mariela Alatorre Rodriguez, whom I've known for 39 years.

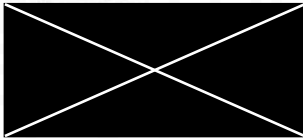
In the time I have known her, she has proven to be a good citizen. She is a kind, helpful and a great role model. I can personally attest to Mariela's exemplary character and work ethic. I have every confidence she will continue to be a valuable member of our society.

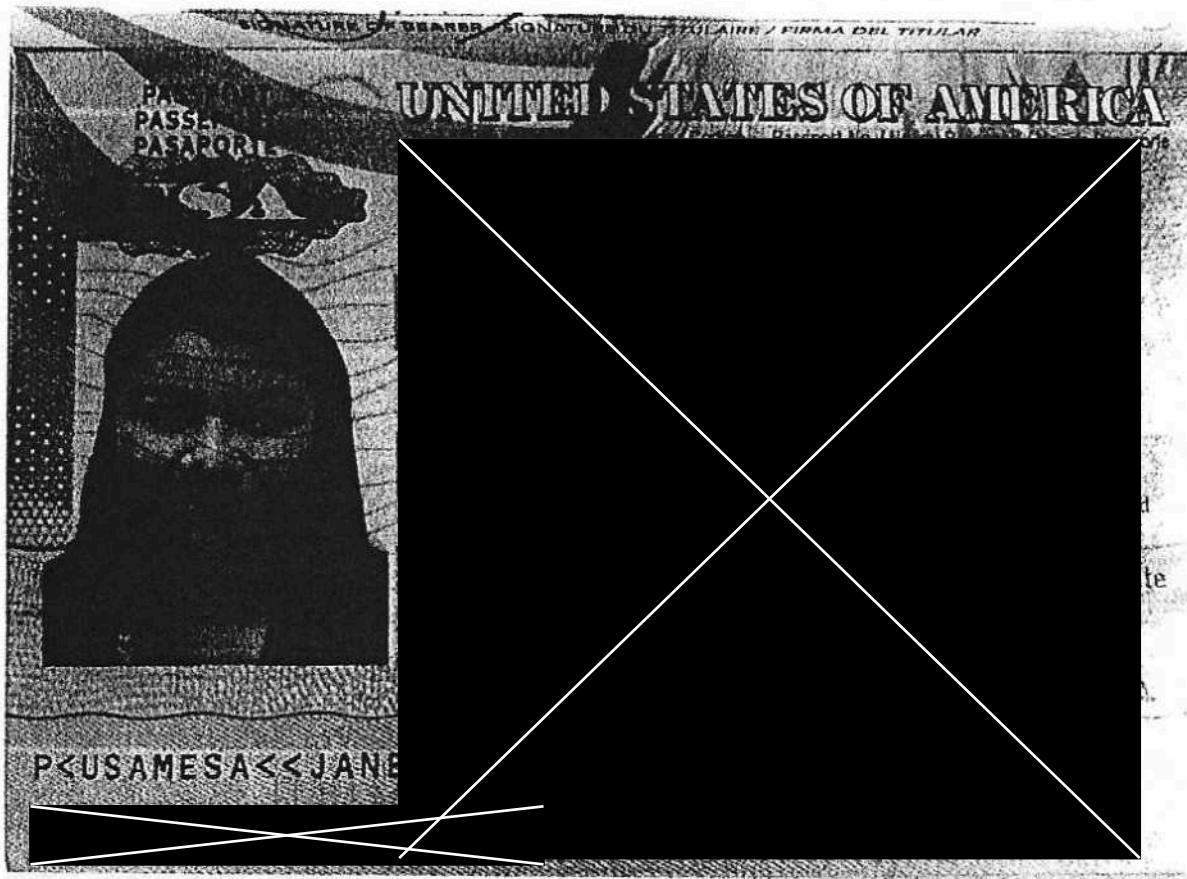
Please feel free to contact me should you require any further information.

Sincerely,

Janet Mesa

Janet Mesa





San Diego, CA

September 24, 2025


To Whom It May Concern:

I, Jose de Jesus Alatorre, residing at [REDACTED] am writing in support of Mariela Alatorre, who is currently in immigration custody.

I am Mariela's brother and have known her my entire life. I can personally attest to her character. She is a caring and loving person who is always there to bring the family together. She regularly checks in on everyone, constantly organizes family gatherings, and encourages all her siblings to spend time together, including each of our families. Mariela works extremely hard to provide for her two boys and is a devoted mother who plays an the most important role in their lives.

I stand ready to support her in any way needed. As her brother, I fully support her and know how much her boys need her. I trust that she will be present for all required proceedings and diligently complete the proper documentation to make things right.

Sincerely,



Jose de Jesus Alatorre

[REDACTED]

Jalatorre2001@hotmail.com

Brother

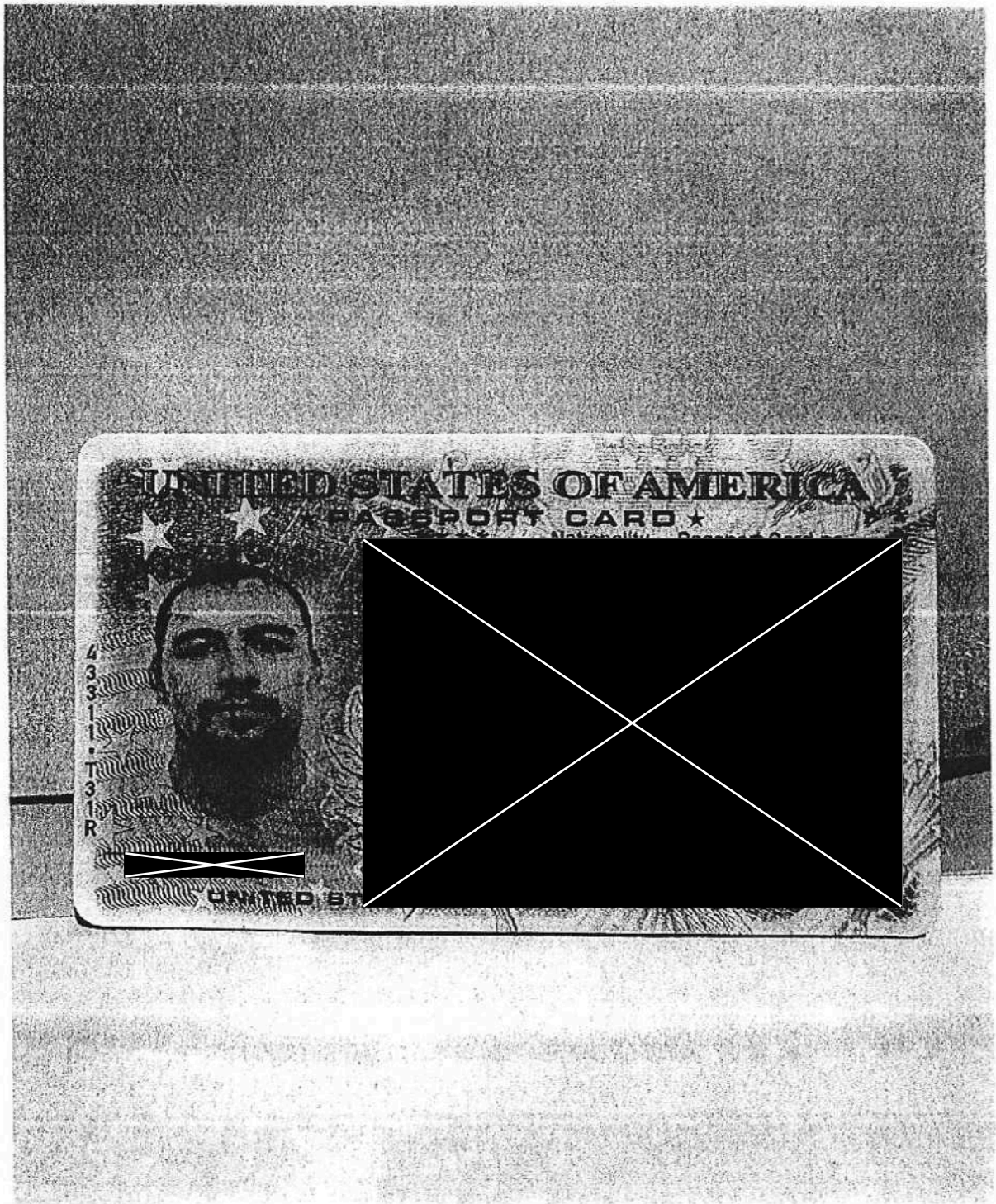
To whom it may concern,

I, Eduardo Contreras who resides at [REDACTED] I am the 2nd youngest brother of a family of 8 siblings. Age 33. Am writing this to support and help whoever needs to make a life changing decision on the future of my sister Mariela Alatorre, see her through my eyes and understand how much of a positive impact she has brought into my life the last 33 years.

Being one of the youngest has been a blessing because Mariela not only has been an older sister but a motherly figure as well. Always there to help me grow, protect me and understand life. I can assure you Mariela brings no negativity into this world. She has always been an outstanding human being and has an endless amount of supportive people to account for that. Mariela has been in the United States all her life and that's all she knows. She's built a beautiful home and mothered 2 great kids that deserve a future along their mother here in the US. I just ask to whoever reads this to understand Mariela is an outstanding law abiding human being. She plays an important role as a sister, friend, mother and hospice caregiver. Mariela should be given the opportunity to continue the only life she knows and that's the life we all dream of here in the US.

Sincerely,

Eduardo Contreras



12701 Sepulveda Heights Blvd
Van Nuys, CA 91411
(818) 741-1043

September 26, 2025

To Whom It May Concern,

My name is Ruben Coss, and I am writing this letter in support of my aunt, Mariela Alatorre, who is currently in immigration detention. I am her nephew and have known her my entire life. I respectfully ask that you consider her release while she awaits the outcome of her immigration case.

Mariela has always been a steady and loving presence in my life and in the lives of so many others in our family and community. She is not only a devoted aunt, but also someone who has shown constant support, generosity, and compassion to those around her. Throughout the years, I've seen her take care of family members, help friends in need, and work hard to build a better life.

She has deep roots here and is a central part of our family. Her absence has been extremely difficult for all of us — emotionally and practically — and we are deeply concerned for her well-being. Her presence at home means so much to us, and she plays an important role in holding our family together.



I truly believe that Mariela is not a danger to the community and that she would fully comply with any requirements placed on her if she were released. She is responsible, respectful of the law, and committed to resolving her case in the proper way.

Please consider this letter as a heartfelt request to grant her release on bond or parole. Our family stands ready to support her in every way possible during this time. Thank you for your attention to her case and for taking the time to consider this letter.

Sincerely,


Ruben Coss




Rubencoss19@yahoo.com




Laura L. Ramirez


lauragil3168@gmail.com

September 25, 2025

To Whom It May Concern,

My name is Laura L. Ramirez, and I am writing this letter in full support of Mariela Alatorre, who is currently undergoing immigration proceedings. I have known Mariela for over ten years, and I can say without hesitation that she is not only one of the most genuine and caring individuals I have ever met, but she is also like family to me.

Mariela is a devoted and loving mother. Her world revolves around her two boys, and she is deeply committed to their well-being, education, and emotional support. She has always put their needs first, and her presence in their lives is essential. Separating her from them would be devastating for her children, who rely on her daily for love, guidance, and stability.

Beyond her role as a mother, Mariela is someone who wins the hearts of everyone she meets. She treats those around her with kindness, compassion, and respect. Whether it's a friend, a neighbor, or someone she's just met, Mariela always extends a helping hand and brings positivity wherever she goes.

Importantly, Mariela is a law-abiding member of our community. She respects the rules and values of this country and has done everything she can to live an honest, peaceful life. Her character, integrity, and strong moral compass are evident in all she does.

Mariela is not just a friend—she is a vital part of our community and of her family's life. I strongly urge you to consider the devastating impact her absence would have on her children and on those of us who know and love her. She deserves the opportunity to remain in the United States and continue building the life she has worked so hard for.

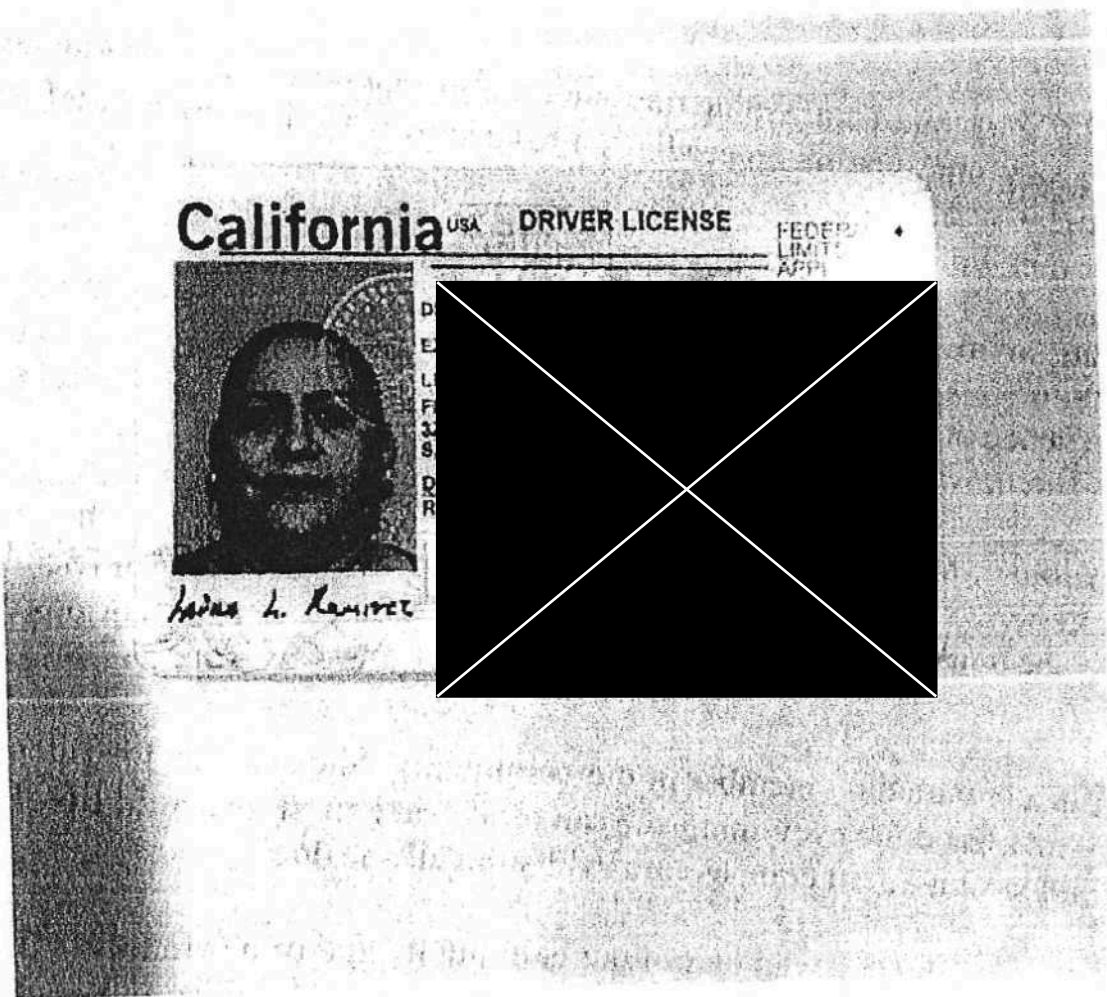
Please take this letter into account as a sincere and heartfelt plea in support of Mariela Alatorre. I am confident that her continued presence in this country will only be a benefit to her family and our society as a whole.

Sincerely,

Laura L. Ramirez


lauragil3168@gmail.com

Laura L. Ramirez



Jamul, CA
September 24, 2025

I am writing this letter in support of Mariela Alatorre and her request to remain in the United States with her family.

My name is Ruben Dario Coss, I reside in [REDACTED] I am Mariela's brother-in-law and have known her for nearly 30 years. In that time, I have seen the incredible person she is—responsible, compassionate, and deeply devoted to her loved ones. Mariela is a hard worker who always makes sure her family is provided for, no matter the circumstances. Her strength and dedication are inspiring to everyone who knows her.

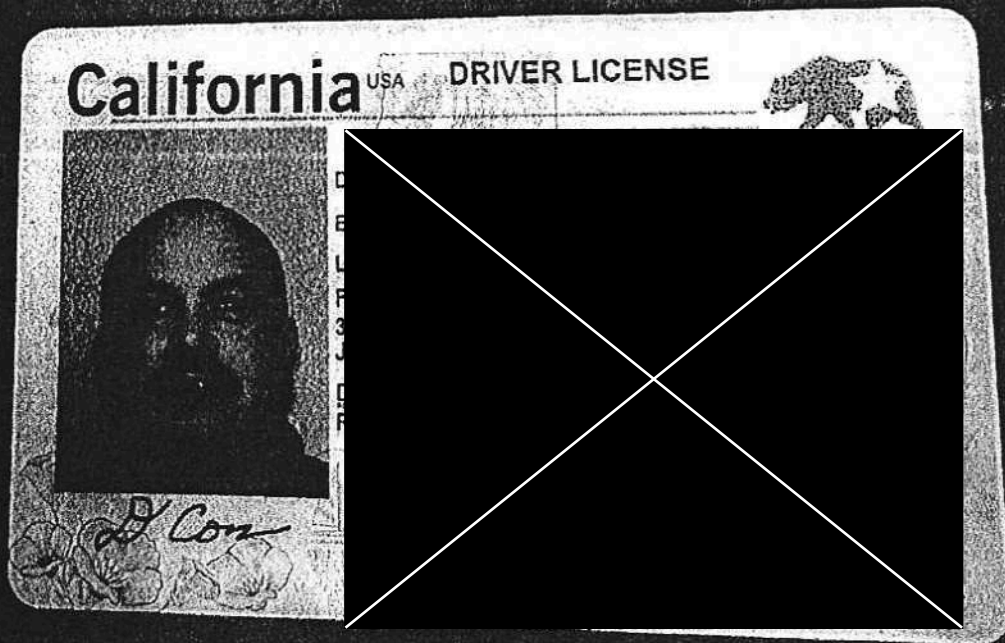
Beyond her work ethic, Mariela is someone with a kind and generous heart. She plays an essential role in our family, not only as a provider but as someone who brings us together. Her bond with her sisters and her mother is incredibly strong, and her presence is vital to our family's emotional and moral support system.

We need Mariela here. Her love, her strength, and her unwavering commitment to her family and community are irreplaceable. I respectfully ask that you take her character, contributions, and the deep roots she has in this country into serious consideration.

Sincerely,

Ruben Dario Coss

ruben@rcosdrywall.com
Brother-in-Law



West Jordan, Utah
September 25, 2025

I am writing this letter in support of Mariela Alatorre and her continued residence in the United States. I currently reside in [REDACTED] I have had the privilege of knowing Mariela for over 20 years, and I can personally vouch for the kind, honest, and hardworking person that she is.

Mariela is not only a devoted family member, but also a dedicated member of our community. She consistently demonstrates compassion, generosity, and a strong work ethic in everything she does. Whether she is helping neighbors, volunteering her time, or going above and beyond in her professional responsibilities, Mariela is always someone people can count on.

It would be a great loss to our community and to her family if she were not allowed to remain in this country. Her presence enriches the lives of those around her, and I truly believe she embodies the values that make this country strong: family, hard work, and service to others.

Please consider her positive contributions and deep ties to this country and her community when making your decision. I wholeheartedly support Mariela Alatorre's case and respectfully ask that she be allowed to stay in the United States with her loved ones.

Sincerely,

Sonia Hernandez

Sonia Hernandez

[REDACTED]

Julys5303@hotmail.com

Friend



Jamul, CA
September 24, 2025

My name is Maria Coss, I reside in [REDACTED] I am Mariela's oldest sister and have been a part of her life since the day she was born. It has been a privilege to watch her grow and develop throughout her entire life. I am writing this letter in strong support of Mariela Alatorre, who is not only a beloved member of our community but an essential part of her family. As an elementary school teacher in the Chula Vista Elementary School District, I work closely with families from all walks of life, and I can confidently say that Mariela is one of the most kind-hearted, selfless individuals I have encountered.

Mariela is the kind of person who always puts others first. Whether it's caring for her family, supporting neighbors, or lending a helping hand without being asked, she leads with compassion and grace. She has an incredible ability to bring people together, and her warmth is felt by everyone around her.

More importantly, Mariela is a devoted mother to two small children who deeply rely on her love, guidance, and daily care. These formative years are critical for any child's emotional and developmental growth, and it is clear that her presence in their lives is not just important—it is irreplaceable. Separating Mariela from her children would be devastating to them and would cause irreparable harm to the stability and well-being of their family.

Mariela is not just important to her family—she is important to our entire community. She embodies the values we try to instill in our students every day: kindness, responsibility, and service to others.

Please consider the profound impact that any action affecting Mariela's ability to stay with her children would have on her family and our community. She belongs here—with the people who love her, need her, and are better because of her.

Sincerely,



Maria Coss

[REDACTED]
Maria.Coss@cvesd.org

Sister

< Notes



Jamul, CA

September 24, 2025

To Whom It May Concern:

I, Juan Bustamante, residing at [REDACTED] am writing in support of Mariela Alatorre, who is currently in immigration custody.

I have been a friend of Mariela for ten years. She is a devoted daughter, sister and mother. She is a hard worker, and a kind, attentive person who always lends a hand to others. I will provide her with my full support during this time. I trust that she will attend all required appearances and complete all necessary documentation to resolve this matter.

Sincerely,

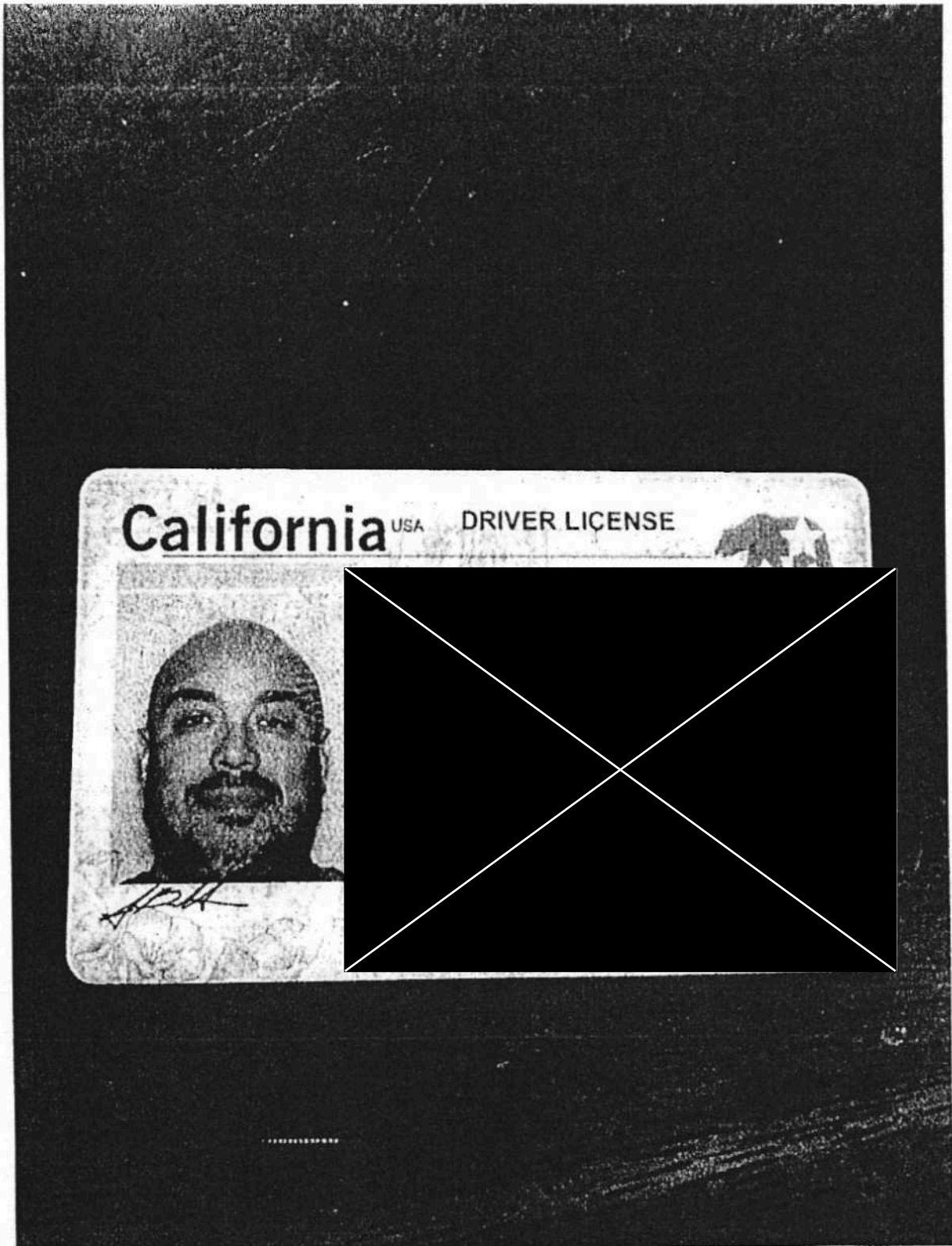


Juan Bustamante

[REDACTED]

jbustamante@sandiego.com

Friend



West Jordan, Utah
September 25, 2025

To Whom It May Concern,

I'm writing this letter in support of Mariela Alatorre and her continued residence in the United States. I live at [REDACTED], and I've had the privilege of knowing Mariela for over 20 years. I can personally speak to the kind, honest, and hardworking person she is.

Mariela is not only a committed family member, but also someone who gives back to the community in meaningful ways. She's dependable, generous with her time, and consistently goes the extra mile — whether that's helping a neighbor, volunteering, or putting in the effort at work. She's someone people rely on, and she shows up for others without hesitation.

Losing her from this community would be a real loss — not just for her family, but for everyone who's had the chance to know her. She brings real value to the people around her and reflects the values that matter most: dedication, family, and service.

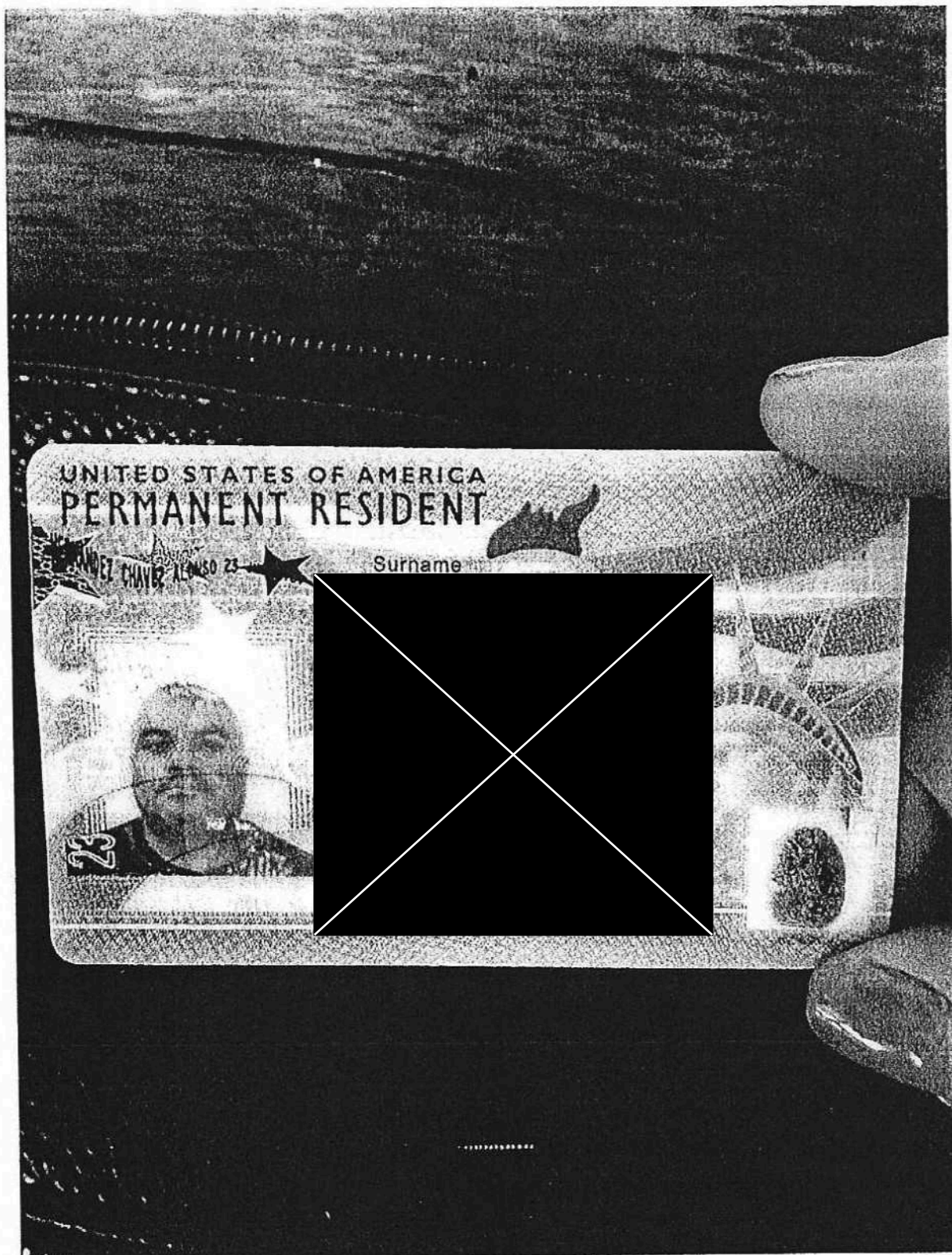
I ask that you consider the positive impact Mariela has had on her community and her strong roots here in the U.S. I fully support her case and sincerely hope she's allowed to stay here with her loved ones.

Respectfully,

Alonso Hernandez Chavez
Alonso Hernandez Chavez

[REDACTED]
Julys5303@hotmail.com

Friend



Jamul, CA
September 24, 2025

To Whom It May Concern:

I, Yunidya Rivera, residing at [REDACTED] am writing in support of Mariela Alatorre, who is currently in immigration custody.

I am Mariela's landlord and have known her for 10 years. I can personally speak to her good character. She demonstrates strong financial responsibility, always paying her rent promptly and providing a stable, secure home for her children. She consistently offers support to those around her, she has a very giving heart.

I will wholeheartedly support her during this time. I have full confidence that she will attend every required appearance and complete all necessary documentation to resolve this situation responsibly.

Sincerely,

Yunidya Rivera
Yunidya Rivera

[REDACTED]
Riverax4@hotmail.com

Landlord



Jamul, CA

September 24, 2025

To Whom It May Concern:

I, Elizabeth Rios, residing at [REDACTED] am writing in support of Mariela Alatorre, who is currently in immigration custody.

I have been a friend of Mariela for ten years now. I know her to be very helpful and attentive, consistently showing care and concern for others. She is a loving person with a strong commitment to her family and most of all her two boys.

I am committed to supporting her fully and sincerely believe she will attend all appearances and complete the necessary paperwork to resolve this matter.

Sincerely,

Elizabeth Rios

[REDACTED]
Erios7271@gmail.com

Friend







October 29th, 2025

Via U.S. Priority Mail

FBI CJIS Division – Summary Request
1000 Custer Hollow Road
Clarksburg, West Virginia 26306

Re: FBI Background Check Request
Applicant: Yanet Gomez Chavez

Dear Sir or Madam,

Our office represents Yanet Gomez Chavez (hereinafter referred to as "Applicant") in the abovementioned matter. Enclosed with this request is the following documentation:

- Applicant's signed FBI Summary Request Form
- FBI Money Order for Filing Fee of \$18 dollars payable to the "Treasury of the United States"
- Applicant's complete Fingerprint Card

Per Applicant's request, please mail the results directly to our office at the address below. Should you require anything further, please do not hesitate to contact our office.

Respectfully submitted,
UNION LAW GROUP, APC

Filex Alexandro Sanchez, Esq.

File No. 25-0753/ FS-GV

PROOF OF SERVICE BY MAIL

I, Elizabeth Leyva, declare:

I am a resident of SANDIEGO COUNTY, State of California. HABEAS PETITIONER Mariela Alatorre Rodriguez is detained at the OTAY MESA DETENTION CENTER, located at 7488 Calzada De La Fuente, San Diego, CA 92154.

On wednesday 29 October, I served the following:

Civil Cover Sheet JS-44; Habeas Petition § 2254 SDForm; Request for Appointment of Counsel; Motion for Appointment of Counsel Pursuant to 18 U.S.C. 3006A; Financial Affidavit ; and IJ Decision.

on the parties herein by placing true and correct copies thereof, enclosed in a sealed envelope, with postage thereon fully paid. The envelope were addressed as follows:

- Warden Christopher LaRose, P.O. Box 438150, San Diego, CA 92143-8150
- The Honorable Kristi Noem, Secretary of Homeland Security, 2707 Martin Luther King Jr Ave SE Washington, DC 20528
- Pamela Bondi, U.S. DOJ, 950 Pennsylvania Avenue, NW Washington, DC 20530-0001
- ICE Acting Director Todd Lyons, 500 12th St SW, Washington, DC 20536
- Director Gregory J. Archambeault, 880 Front Street # 2242, San Diego, CA, 92101
- Immigration & Customs Enforcement, 500 12th St SW, Washington, DC 20536
- US DHS, Secretary of Homeland Security, 2707 Martin Luther King Jr. Ave SE Washington, DC 20528

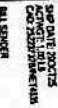
I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Signature: Elizabeth Leyva

Name: Elizabeth Leyva

Executed on 10 / 29 / 2025

06/13/25 03:48



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SAN DIEGO, CA 92113
UNITED STATES, US
TO CLERK OF U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
333 W. BROADWAY SUITE #420

SAN DIEGO CA 92101
619-594-2179



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SOUTHERN DISTRICT OF CALIFORNIA
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