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Attorney for Petitioner

UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF VERMONT

CARLA CRISTINA PIEDRAHITA-SANCHEZ,	)	
	)	
	)	Case No. 2:25-cv-00875
Petitioner-Plaintiff,	)	
	)	
V.	)	
	)	
JONATHAN TUREK, Interim Superintendent of	)	
Chittenden Regional Correctional Facility	)	
PATRICIA HYDE, Acting Field Office Director;	)	
TODD LYONS, Acting Director, U.S.	)	
Immigrations and Customs Enforcement;	)	
SIRCE OWEN, Acting Director, Executive Office	)	
For Immigration Review;	)	
PAMELA BONDI, U.S. Attorney General;	)	
and KRISTI NOEM, U.S. Secretary of	)	
Homeland Security,	)	
	)	
Respondents-Defendants.	)	
_____	)	

**NOTICE TO THE COURT REGARDING OUTCOME OF NOVEMBER 19, 2025 BOND  
HEARING**

Petitioner respectfully submits this notice to advise the Court of developments arising from the bond hearing held on November 19, 2025, before Immigration Judge Smith in the Chelmsford Immigration Court.

At that hearing, the Immigration Judge granted Petitioner a bond in the amount of \$4,000.00. The Department of Homeland Security (“DHS”) reserved appeal on the record and asserted that Petitioner “remains a flight risk.”

During the hearing, Petitioner’s counsel argued that Petitioner is not a flight risk, relying on the evidence contained in the record. (See Exhibit A, attached). DHS submitted two documents: (1) a Form I-213, Record of Inadmissibility, and (2) a one-page document containing assertions about Petitioner’s alleged risk but bearing no agency letterhead, author name, or indication of its origin. After objection to the lack of signature, DHS then submitted an electronically signed I-213.

Petitioner’s counsel objected to the admission of these documents, emphasizing that they are unsigned and inherently unreliable:

- The Form I-213 submitted by DHS is unsigned and unexecuted by the officer purported to have prepared it.
- An unsigned I-213 is not a sworn or certified government record and therefore does not qualify for any presumption of regularity typically afforded to properly executed government documents.
- Without a signature, there is no assurance that the statements in the form were made by the officer, recorded contemporaneously, or based on personal knowledge.
- Petitioner further argued that DHS bears the burden of establishing reliability before such a document may be admitted. See *Matter of Barcenas*, 19 I. & N. Dec. 609, 611 (BIA 1988) (government documents are admissible only if they are “probative and their admission is fundamentally fair”).

Despite these objections, the Immigration Judge admitted all documents into evidence. Judge Smith ultimately found that Petitioner presents some flight risk, but concluded that the posting of a \$4,000 bond sufficiently ameliorates that risk. DHS indicated on the record that it intends to appeal the Immigration Judge’s bond determination.

Petitioner submits this notice to ensure the Court is fully apprised of the procedural posture and the current status of Petitioner’s custody determination before the Immigration Court. Petitioner’s husband is on his way to the ICE Burlington Facility to post the bond payment for Petitioner’s release. If Petitioner is not duly released, Petitioner, through Counsel, will file a request for this Court to order her immediate release, pursuant to the 11/14/2025 Habeas Order.

Dated: November 19, 2025

Respectfully submitted,

/s/ Caitlyn Burgess

Caitlyn Burgess, Esq.

Counsel for Petitioner

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**CERTIFICATE OF SERVICE**

I hereby certify that the foregoing document will be served on counsel for all parties through the Court's CM/ECF system.

Dated this 19th day of November, 2025.