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5 Attorney for petitioner

6
7 UNITED STATES DISTRICT COURT
8 Southern District of California

9
10 ANSELMO ROMERO SANCHEZ,
11 Petitioner,
12 v.

13 CHRISTOPHER J. LaROSE; *et al.*,
14 Respondents.

) Case Number: 25-cv-3136-JSL-JLB
)
) **DECLARATION OF WILLIAM**
) **BAKER IN SUPPORT OF PETITION**
) **FOR WRIT OF HABEAS CORPUS**

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DECLARATION OF WILLIAM BAKER

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2 I, WILLIAM BAKER, declare:

3 1. I am the attorney for petitioner Anselmo Romero Sanchez. This declaration is
4 submitted in response to the court's November 24, 2025 order for supplemental briefing on the
5 status of petitioner's parole prior to his re-detention. I obtained this information from the petitioner.
6 Unfortunaely, his removal and appeal cases are paper files. So I was not able to access the
7 Immigration Court Electronic Record of Proceedings (eROP) and petitioner's applications for relief.
8 Still, here is what happened.

9 2. First, petitioner was not granted a parole into the USA at the border. He last entered
10 the USA around 1998 by crossing illegally through the hills. He was not detained at the time he last
11 crossed over the border.

12 3. The removal case apparently began years ago when petitioner, through an attorney,
13 filed an asylum application with the United States Citizenship and Immigration Services (USCIS).
14 The USCIS did not approve the asylum application but referred it to immigration court. On
15 November 8, 2016 the Department of Homeland Security (DHS) filed a Notice to Appear in
16 immigration court. The DHS never physically detained petitioner at the start of his removal case.
17 So, this was effectively a release on his own recognizance.

18 4. The immigration judge denied the applications for relief. On November 6, 2020,
19 petitioner filed an appeal with the Board of Immigration Appeals (BIA). The BIA case was
20 administratively closed until the DHS filed a motion to reinstate the appeal on October 17, 2025.
21 The motion to reinstate is apparently still pending.

22 5. Petitioner attended his court hearings. He also attended periodic check ins the DHS
23 Enforcement and Removal Operations office at the downtown office. On October 14, 2025,
24 petitioner appeared as directed at the downtown ERO office. There he was detained and sent to the
25 Otay Mesa Detention Center. The immigration judge denied the bond request, concluding he had no
26 jurisdiction. There have been a couple of recent updates.

27 6. First, a district court judge in the Central District of California certified a nationwide
28 class of bond applicants and concluded the BIA case of Yajure Hurtado, 29 I & N Dec. 216 (BIA

1 2025 was wrongly decided. *See Lazaro Maldonado Bautista v. Ernesto Santacruz*, et al, 25-cv-
2 01873-SSS-BFN (Central District of California, November 20, 2025). This ruling and order appears
3 to resolve the jurisdictional (1226 v. 1225) aspect of the habeas corpus petition. So, petitioner has
4 filed a new bond request at the Otay Mesa Immigration Court. The bond request has still not yet
5 been set for a hearing.

6 7. However, petitioner still believes the court should order him released to the street.
7 Petitioner continues to argue that the October 14, 2025 re-detention was a violation of Due Process.
8 It appears the DHS just arbitrarily re-detained him in a desperate attempt to boost deportation
9 numbers.

10 I declare under penalty of perjury under the laws of the United States that the foregoing is
11 true and correct. Executed on December 1, 2025 at San Marcos, California.

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13 */s/ William Baker*
14 William Baker (157 906)
15 Attorney for petitioner
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