



**BOROWSKI WITMER  
IMMIGRATION LAWYERS**

VIRGINIA:

7005 Backlick Ct., Ste. 201 Springfield, VA 22151

703-649-3225

**U.S. & Canadian Immigration Lawyers**

MATTHEW K. BOROWSKI (New York, Virginia, Ontario)

RYAN L. WITMER (Florida)

HARITH MAZRUI (New Jersey)

E-MAIL: [staff@borowskilaw.com](mailto:staff@borowskilaw.com)

FAX: 716-710-5445 WEB: [www.borowskilaw.com](http://www.borowskilaw.com)

*Practice Elsewhere Limited to Federal Immigration Law*

Elizabeth A. Wolford  
Chief United States District Judge  
Kenneth B. Keating Federal Building  
100 State Street  
Rochester, New York 14614

November 26, 2025

*Via CM/ECF, Service by CM/ECF to all parties*

**Re: 6:25-cv-06672-EAW, Betancourt v. Freden et al (Petition for Writ of Habeas Corpus)  
Denial of Bond by an Immigration Judge Without Consideration to the Factors  
Enumerated In This Court's Order**

Dear Chief Judge Hon. Elizabeth A. Wolford,

I am writing to inform the Court that today, November 26, 2025 at approximately 9:10 A.M. Eastern Time a bond hearing was held for Petitioner, Celeste Yuliani Betancourt Izaquirre, before Immigration Judge Kandra K. Robbins at the Lasalle/Jena Immigration Court in Jena, Louisiana. Bond was denied under the theory that Petitioner is a flight risk that no bond amount nor combination of non-bond alternatives to detention could ameliorate.

IJ Robbins was aware of this Court's order and that the burden is on the government to establish flight risk or danger to the community. Counsel for the Department of Homeland Security appeared at the hearing and made a single argument in favor of a finding of flight risk: that Petitioner "entered the country illegally."

The IJ found that Petitioner appeared at all of her check-in appointments and complied with all ICE requirements. She acknowledged that Petitioner had no criminal record and had a fixed address. She acknowledged that Petitioner had a timely-filed application for asylum and withholding of removal. However, she denied bond, stating to the Petitioner that "Immigration

relief is highly speculative as the application indicates that you do not fear harm and you have not been harmed.”

The Immigration Judge, without any meaningful analysis or rationale, ordered that Petitioner remain held in the custody of Respondents. No consideration was given to whether any less-restrictive alternatives to detention can reasonably address the government’s interest in Petitioner’s continued detention. No testimony was taken from Petitioner and no reason was given for denial of bond other than the Immigration Judge’s opinion that “relief is speculative.” The IJ also stated, when purportedly balancing the factors, that Petitioner failed to show “family ties, educational history, or assets that would weigh in her favor” yet did not explain how the government met its burden of showing flight risk where the sole argument made by the government was that Petitioner “entered illegally.”

It is my opinion that the IJ did not follow this Court’s order and that no meaningful bond hearing was held. Petitioner complied with all Immigration Court deadlines during the pendency of her Immigration Court case which was initiated on May 30, 2023 and remains pending. She complied with all ICE check-in appointments during this time period as well. It is unfathomable that no combination of monetary bond and/or alternatives to detention, such as an ankle monitor, reporting requirements, geographical restrictions, etc. could serve to ensure her continued attendance at all future hearings. Again, Petitioner was detained by ICE when reporting to her scheduled check-in appointment, a fact which clearly demonstrates compliance with the law and cuts strongly against a finding of flight risk.

We respectfully ask the court to consider taking action to enforce its order dated November 20, 2025 in this matter, up to and including ordering Petitioner’s immediate release.

Thank you for your attention to this matter.

Sincerely,

\_\_\_\_/s/ Matthew Borowski\_\_\_\_

Matthew Borowski  
*Counsel for Ms. Betancourt*

Elizabeth A. Wolford  
Chief United States District Judge  
Kenneth B. Keating Federal Building  
100 State Street  
Rochester, New York 14614

November 26, 2025

*Via CM/ECF, Service by CM/ECF to all parties*