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UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

CHRISTOBAL DOMINGUEZ AMADOR *Petitioner*, v. GEORGE DEDOS, *in his official capacity as Warden of* Torrance County Detention Center; MARY DE ANDA-YBARRA, *in her official capacity as Field Office Director of the Immigration and Customs Enforcement, Enforcement and Removal Operations* Torrance County Detention Center; TODD LYONS, Acting Director of U.S. Immigration and Customs Enforcement KRISTI NOEM, *in her official capacity as Secretary of the U.S. Department of Homeland Security;* and PAMELA BONDI, *in her Official capacity as Attorney General of the United* States *Respondents*.	Case No.: _____ **COMPLAINT AND PETITION FOR WRIT OF HABEAS CORPUS AND INJUNCTIVE RELIEF**

Petitioner, CHRISTOBAL DOMINGUEZ-AMADOR (DHS No. A [redacted])[1] is an individual who is unlawfully detained by the Respondents.

[1] Mr. Dominguez Amador's name is incorrectly stated in DHS proceedings as "Christoval Dominguez Amado"; however, his legal and correct name is "Christobal Dominguez Amador".

I. INTRODUCTION

1. Petitioner Christobal Dominguez Amador ("Petitioner") is a 54-year-old citizen of Mexico, who fled his home country at around 27 years old seeking a safer and better life for himself and his family.
2. Petitioner currently has an Asylum application pending with the Executive Office for Immigration Review ("EOIR") as he fears persecution and torture in his home country.
3. Several of Petitioners family have been tortured and killed at the hands of cartel member in Mexico, and Petitioner fears the same fate if he were forced to return to his home country.
4. On or about June 25, 2025, Petitioner was arrested by Immigration and Customs Enforcement ("ICE") at his place of employment in Downey, California without reasonable suspicion in violation of the Fourth Amendment's safeguard against unreasonable seizures.
5. Petitioner has now been held in custody for over three months with no end in sight.
6. Petitioner asks this Court to find that Petitioner's detention is unlawful and issue a writ of habeas corpus for Petitioner to be immediately released from custody.

II. JURISDICTION AND VENUE

7. This action arises under the Constitution of the United States and the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1101 *et seq*., and the Administrative Procedures Act ("APA"), 5 U.S.C. §§ 500-596, 701-706. Respondents have waived sovereign immunity for purposes of this suit. [See 5 U.S.C. §§ 702, 706].
8. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

9. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et. seq*., the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq*., and the All Writs Act, 28 U.S.C. § 1651.

10. Venue is proper in this district and division pursuant to 28 U.S.C. § 2241(c)(3) and 28 U.S.C. § 1391(b)(2) and (e)(1) because Petitioner is detained within this district at Torrance County Detention Center, in Estancia, New Mexico, which is within the jurisdiction of this District.

11. Venue is proper in this District because a substantial part of the events or omissions giving rise to this action occurred and continue to occur at Torrance County Detention Center, in Estancia, New Mexico. 28 U.S.C. § 1391(e).

III. REQUIREMENTS OF 28 U.S.C. § 2243

12. The Court must grant the petition for writ of habeas corpus or issue an order to show cause ("OSC") to the respondents "forthwith," unless the petitioner is not entitled to relief. [See 28 U.S.C. § 2243]. If an order to show cause is issued, the Court must require respondents to file a return "within *three days* unless for good cause additional time, not exceeding twenty days, is allowed." [*Id.* (emphasis added)].

13. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." [See *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added)].

IV. PARTIES

14. Petitioner was arrested by ICE officers on June 14, 2025, and was transferred to Torrance County Detention Center where he is currently detained. He is in custody, and under the direct control, of Respondents and their agents.

15. Respondent George Dedos is the Warden of at Torrance County Detention Center, and he has immediate physical custody of Petitioner pursuant to the facility's contract with U.S. Immigration and Customs Enforcement to detain noncitizens and is a legal custodian of Petitioner. Respondent Dedos is a legal custodian of Petitioner.

16. Respondent Mary De Anda-Ybarra is sued in her official capacity as the Acting Director of the El Paso Field Office of U.S. Immigration and Customs Enforcement. De Anda-Ybarra is a legal custodian of Petitioner and has authority to release him.

17. Respondent Kristi Noem is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security ("DHS"). In this capacity, Respondent Noem is responsible for the implementation and enforcement of the INA, and oversees U.S. Immigration and Customs Enforcement, the component agency responsible for Petitioner's detention and custody. Respondent Noem is a legal custodian of Petitioner.

18. Respondent Pam Bondi is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice ("DOJ"). In that capacity, she has the authority to adjudicate removal cases and to oversee the EOIR, which administers the immigration courts and the Board of Immigration Appeals ("BIA"). Respondent Bondi is a legal custodian of Petitioner.

V. STATEMENT OF FACTS

19. Petitioner is a 49-year-old individual born on March 05, 1976, who currently resides in the United States since 1998.

20. Petitioner has three U.S. children, [redacted] born, on [redacted] born on [redacted]; and [redacted] born on [redacted] [redacted] [*See* Exhibit 3: "Copies of Birth Certificates for Petitioner's [redacted] Children"].

21. On or about June 14, 2025, the Petitioner was at the Dunn Edward's Paint Store in Norwalk, CA at around 8:00 A.M. to buy paint. [*See* Exhibit 1: "Declaration from Christobal Dominguez Amador with English Translation"].

22. Petitioner was arrested under duress as he was physically put into an unmarked vehicle. [*Id.*]. No warrant for his arrest was ever shown to him. [*Id.*]

23. Petitioner feels that he was arrested unjustly. [*Id.*]. At no time did the officers have Respondent's consent to question or detain him, nor did they have judicial warrant to seize Respondent. [*Id.*].

24. On August 13, 2025, Petitioner was denied a Motion to Suppress evidence by the Immigration Judge; however, the Immigration Judge denied the Motion to Suppress and Terminate Proceedings on August 13, 2025, mere hours after it was submitted via the Court's Electronic Filing System. [*See* Exhibit 10: "Copy of Order from Immigration Judge Denying Motion to Suppress dated 08/13/2025"]. In addition, within the order of the Immigration Judge denying the Motion to Suppress, the Immigration Judge required the Petitioner to file any applications for relief by August 14, 2025, less than 24 hours after the issuance of the

decision. This was yet another attempt to hinder the Petitioner from seeking any recourse or applications for relief. [*Id*.].

25. On August 14, 2025, the Petitioner submitted his Form I-589 Application for Asylum, Withholding of Removal and Convention Against Torture. [*See* Exhibit 4: "Copy of Form - 589 and Form EOIR-42B submitted on 08/14/2025 via ECAS"]. In addition, he submitted his Form EOIR-42B Cancellation of Removal for Certain Non-Permanent Residents. [*Id*.]. Despite the Petitioner being detained, he and his attorney managed to meet the unreasonable deadline as he did not want to forfeit any applications for relief.
26. On September 10, 2025, the Petitioner submitted an Interlocutory Appeal to the BIA as the Petitioner claimed the Immigration Judge was prejudicial in denying the Motion to Suppress without a proper analysis of the constitutional arguments. [*See* Exhibit 9: "Copy of Receipt Notice for Interlocutory Appeal from Board of Immigration Appeals Dated 09/10/2025"].
27. On October 31, 2025, the BIA issued a decision on the interlocutory appeal, vacating the August 13, 2025, order of the Immigration Judge denying the Motion to Suppress and remanded the matter back to the Immigration Judge. [*See* Exhibit 8: "Copy of Decision of the BIA Remanding Interlocutory Appeal dated 10/31/2025"]. The Immigration Judge issued a special evidentiary hearing for November 19, 2025, to issue a new decision on the Motion to Suppress. [*See* Exhibit 7: "Copy of Order of the Immigration Judge Recalendaring Evidentiary Hearing dated 10/31/2025"].
28. On November 19, 2025, at the Motion to Suppress Evidentiary hearing, the Immigration Judge again denied the Motion to Suppress. [See Exhibit 6: "Copy of Order of the Immigration Judge Denying Motion to Suppress dated 11/19/2025"]. The Immigration Judge

found that the Petitioner's Forth Amendment Rights had been violated; however, because there was no remedy available, he denied the Motion to Suppress. [*Id*.].

29. Petitioner has exhausted all remedies available with EOIR to seek release. Despite all of Petitioner's efforts has been in ICE custody for over four months, with no end in sight. [*Id*.].

30. ICE has not identified any exceptional circumstances warranting Petitioner's continued detention under ICE policy. [*Id*.].

VI. LEGAL FRAMEWORK

31. The Fourth Amendment protects "[t]he right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures." [*See* U.S. Const. amend. IV]. It is a fundamental tenet of Fourth Amendment law that "a search or seizure of a person must be supported by probable cause particularized with respect to that person*."* [See *Ybarra v. Illinois*, 444 U.S. 85, 91 (1979)].

32. Furthermore, 8 C.F.R. § 287.8(b)(2) provides that for an immigration officer to lawfully detain a person they suspect to be in the country illegally they must have "a reasonable suspicion, based on specific articulable facts, that the person being questioned is, or is attempting to be, engaged in an offense against the United States or is an alien illegally in the United States." The Court of Appeals for the Ninth Circuit has held that ICE agents that "carr[ied] out preplanned mass detentions, interrogations, and arrests [. . .], without individualized reasonable suspicion" violates 8 C.F.R. § 287.8(b)(2). [See *Perez Cruz v. Barr*, 926 F.3d 1128,1133 (9th Cir. 2019)]. Most recently, on August 1, 2025, the Ninth Circuit upheld a temporary restraining order barring the federal government from conducting detentive stops for the purposes of immigration enforcement without first establishing individualized, reasonable suspicion that the person to be stopped is unlawfully in the United

States. [See *Vasquez Perdomo v. Noem*, No. 25-4312, 2025 WL 2181709 (9th Cir. Aug. 1, 2025)]. Although, the Supreme Court has issued a temporary stay of the Ninths Circuit injunction, the court's order in *Noem v. Vasquez Perdomo*, No. 25A169, 606 U.S. ___ (2025), reaffirms the constitutional requirement that immigration related stops must be based on individualized, reasonable suspicion of unlawful presence, and that reliance solely on race, language, or other proxies for national origin is insufficient under the Fourth Amendment. Longstanding precedent, including *United States v Brigoni-Ponce*, 422 U.S. 873 (1975), remains controlling emphasizing that while ethnicity may be one factor among many, it cannot be the sole or primary justification for a stop.

33. The Due Process Clause requires that the deprivation of Petitioners' liberty be narrowly tailored to serve a compelling government interest. In *Reno v. Flores*, the Court held that due process "forbids the government to infringe certain 'fundamental' liberty interests at all, no matter what process is provided, unless the infringement is narrowly tailored to serve a compelling state interest". [See *Reno v. Flores*, 507 U.S. 292, 301–02 (1993)]. As the Supreme Court held in *Zadvydas*, indefinite detention, and detention without adequate procedural protections, would raise a "serious constitutional problem" and run afoul of the Due Process Clause. [See 533 U.S. at 690].

34. As the Supreme Court held in Jennings, section 1226(a) is the "default rule," which governs "aliens already in the country" who are subject to removal proceedings, whereas section 1225(b) governs "aliens seeking admission into the country." [See *Jennings v. Rodriguez*, 583 U.S. 281, 288–89 (2018)]. The respondent has been present in the United States for more than twenty years and thus fall in the former category of "aliens already in the country" subject to the discretionary detention provisions in section 1226(a).

35. The United States District Court of the Eastern District of Virginia held that "...Petitioners' detention is governed by section 1226(a)'s discretionary framework, not section 1225(b)'s mandatory detention procedures, and under §1226(a) and its implementing regulations, Petitioners are entitled to a bond hearing before an Immigration Judge." [See *Lopez Sarmiento v. Perry et al*, No. 1:2025cv01644 - Document 16 (E.D. Va. 2025)].

36. Section 1231 of Title 8 of the U.S. Code governs the detention and removal of noncitizens. Section 1231(a)(2) authorizes a 90-day period of mandatory post-final-removal-order detention, during which ICE is supposed to effectuate removal. This 90-day period known as the "removal period" begins on the latest of one of the triggering conditions listed in Section 1231(a)(1)(B)(i)-(iii): (i) the entry of a final removal order; (ii) the final order from a circuit court reviewing the removal order, if the court ordered a stay of removal pending review, or (iii) "[i]f the [noncitizen] is confined (except under an immigration process), the date the [noncitizen] is released from detention or confinement." Pursuant to 8 U.S.C. § 1231(a)(3), After the 90-day removal period ends, those individuals who are not removed within the 90-day removal period are no longer subject to mandatory detention, and should generally be released under conditions of supervision, such as periodic reporting and other reasonable restrictions. Under § 1231(a)(6), The government may continue to detain certain noncitizens beyond the 90-day removal period if they have been ordered removed on inadmissibility grounds after violating nonimmigrant status or conditions of entry, or on grounds stemming from criminal convictions, or security concerns or if they have been determined to be a danger to the community or a flight risk. If these groups of noncitizens are released, they are also subject to the supervision terms set forth in Section 1231(a)(3).

37. Federal law prohibits the government from removing a noncitizen to a country where he is more likely than not to face persecution on account of a statutorily protected ground. 8 U.S.C. § 1231(b)(3)(A). This protection is usually referred to as "withholding of removal." When a non-citizen has a final withholding grant, they cannot be removed to the country or countries for which they demonstrated a sufficient likelihood of persecution or torture. *See* 8 U.S.C. § 1231(b)(3)(A). While ICE is authorized to remove non-citizens who were granted withholding to alternative countries, the removal statute specifies restrictive criteria for identifying appropriate countries. [*See* 8 U.S.C. § 1231(b)]. Non-citizens can be removed, for instance, to the country "of which the [non-citizen] is a citizen, subject, or national," the country "in which the [non-citizen] was born," or the country "in which the [non-citizen] resided" immediately before entering the United States. [*See* 8 U.S.C. § 1231(b)(2)(D)-(E)].

38. If a noncitizen is granted withholding of removal, "DHS may not remove the alien to the country designated in the removal order unless the order of withholding is terminated." [See *Johnson v. Guzman Chavez*, 594 U.S. 523, 531 (2021)]. Federal regulations provide a procedure by which a grant of withholding of removal issued by an immigration judge may be terminated: DHS must move to reopen the removal proceedings before the immigration judge, and then DHS will bear the burden of proof, by a preponderance of the evidence, that grounds for termination exist. 8 C.F.R. § 1208.24(e). After a grant of withholding of removal is terminated, there would be no impediment to removal.

VII. CLAIMS FOR RELIEF

COUNT ONE
Violation Of Immigration and Nationality Act, 8 U.S.C. § 1231(A)(6)

39. Petitioner realleges and incorporates by reference the paragraphs above.

40. 8 U.S.C. § 1231(a)(6), as interpreted by the Supreme Court in *Zadvydas*, authorizes detention

only for "a period reasonably necessary to bring about the alien's removal from the United States." 533 U.S. at 689, 701. Post-removal order detention for less than six months may still be unreasonable in unique circumstances like Petitioner's where he can meet his burden of demonstrating that removal is not reasonably foreseeable. *Trinh v. Homan*, 466 F. Supp. 3d 1077, 1093 (C.D. Cal. 2020) ("*Zadvydas* established a 'guide' for approaching detention challenges, not a categorical prohibition on claims challenging detention less than six months.")

41. Petitioner's continued detention has become unreasonable because his removal is not reasonably foreseeable. Therefore, his continued detention violates 8 U.S.C. § 1231(a)(6), and he must be immediately released. Petitioner has submitted an application for Asylum and for Withholding of Removal and Convention Against Torture and an application for Cancellation of Removal for Certain Non-Permanent Residents and both applications are currently pending with EOIR. [*See* Exhibit 4: "Copy of Form I-589 and Form EOIR-42B submitted on 08/14/2025 via ECAS"]. Petitioner can establish well-founded fear of future persecution because he genuinely fears returning to a country he has not been to in more than twenty years. In addition, his application for Cancellation of Removal shows the extreme and unusual hardships his USC children would face as a result of his removal from the United States. As these applications are pending with EOIR it is not reasonably foreseeable that Petitioner will be immediately removed.

42. Continued detention therefore violates 8 U.S.C. § 1231(a)(6) as interpreted by the U.S. Supreme Court in *Zadvydas v. Davis*, 533 U.S. 678 (2001).

COUNT TWO
Violation of Fourth Amendment Unreasonable Search and Seizure

43. The allegations in the above paragraphs are realleged and incorporated herein.

44. The Fourth Amendment protects "[t]he right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures." [See U.S. Const. amend. IV]. Within the meaning of the Fourth Amendment a person has been "seized" only if, in view of all of the circumstances surrounding the incident, a reasonable person would have believed that he was not free to leave. [See *United States v. Mendenhall*, 446 U.S. 544 (1980)]. If the person to whom questions are put remains free to disregard the questions and walk away, there has been no intrusion upon that person's liberty or privacy as would require some particularized and objective justification. [*Id.*]. It is a fundamental tenet of Fourth Amendment law that "a search or seizure of a person must be supported by probable cause particularized with respect to that person." [See *Ybarra v. Illinois*, 444 U.S. 85, 91 (1979)]. In addition, 8 C.F.R. § 287.8(b)(2) provides that for an immigration officer to lawfully detain a person they suspect to be in the country illegally they must have "a reasonable suspicion, based on specific articulable facts, that the person being questioned is, or is attempting to be, engaged in an offense against the United States or is an alien illegally in the United States."
45. The agents' actions constituted a non-consensual seizure under the Fourth Amendment. A reasonable person, witnessing agents running towards them after arriving in unmarked vehicles, would not feel free to leave or refuse questioning. Here, ICE, ERO, FBI, and HIS officers unlawfully detained the Petitioner as he was exiting a paint store collecting supplies for his work and was getting ready to leave an unmarked car pulled up behind him. [*See* Exhibit 1: "Declaration from Christobal Dominguez Amador with English Translation"]. A masked individual told him to turn off his truck, and asked for his U.S. identification, the Petitioner showed him his "rights card" and the agent threw it at him and told him that he knows they are not advised to talk to him, but that things don't work that way. [*Id*.]. The

Petitioner was forced out of his vehicle and placed in the back of the unmarked vehicle.

46. The Petitioner did not immediately know who was arresting him until he arrived at Los Angeles Detention Center. He was arrested without reasonable suspicion or lawful warrant authority. [*Id*.]. The officers did not properly identify themselves to Petitioner nor did they carry any identifying badges.

47. Any statements that Petitioner made were a product of coercion and duress, rather than a knowing and voluntary choice.

48. Under these circumstances, any statements made by Petitioner were not the result of free will, but rather were compelled by fear, intimidation, and coercive tactics employed by ICE, ERO, FBI and HIS agents in violation of Respondent's constitutional rights.

49. The presence of multiple agents is a significant factor in determining that a reasonable person would not have felt free to leave. The use of unmarked vehicles and agents lack of identifying insignia created conditions of intimidation and fear, effectively compelling Petitioner to remain at the location and submit to questioning. As a consequence of these circumstances, Petitioner felt as if he was not free to leave and was therefore compelled to stay and provide information. These conditions would make any reasonable person feel detained, regardless of whether they physically tried to flee.

50. In addition, Petitioner was detained without reasonable suspicion, in violation of the Fourth Amendment's safeguard against unreasonable seizures. The seizure was unsupported by reasonable suspicion, relying solely on racial appearance and location, which is impermissible under *Brigoni-Ponce*. [See *United States v. Brignoni-Ponce*, 422 U.S. 873 (1975)]. The ICE agents approached Petitioner without individualized, reasonable suspicion, instead relying on his appearance and where he was located. [*Id*.]

51. Petitioner was simply doing his job, like countless others do every day. He had no reason to believe he was breaking any law, nor was he given any indication that his presence there was unlawful. Petitioner was lawfully present at the location he was arrested as he was shopping for paint at the time. Petitioner was not given a specific or articulable reason for the stop by any law enforcement agent.

52. For these reasons, Petitioner's detention violates the Fourth Amendment, and he must be immediately released.

COUNT THREE
Violation of Fifth Amendment Due Process Clause

53. The allegations in the above paragraphs are realleged and incorporated herein.

54. The Due Process Clause of the Fifth Amendment forbids the government from depriving any person of liberty without due process of law. [See U.S. Const. amend. V]. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty" that the Due Process Clause protects. [See *Zadvydas*, 533 U.S. at 690 (citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992))]. Civil immigration detention violates due process if it is not reasonably related to its statutory purpose. [See *Id*. at 690 (citing *Jackson v. Indiana*, 406 U.S. 715, 738 (1972))]. In the immigration context, the Supreme Court has recognized only two valid purposes for civil detention: to mitigate the risk of flight and prevent danger to the community. [See *Id*.; *Demore v. Kim,* 538 U.S. 510, 514–15, 528 (2003)].

55. First, Petitioner does not pose a danger to the community. Petitioner has three United States citizen children that he cares for deeply and that depend on him immensely. [See Exhibit 2: "USC Children Birth Certificates"]. The Petitioner's wife, Azalea Dominguez has been battling cancer and relies on her husband as her caretaker and provider for their family. [*See*

Exhibit 1: "Declaration of Azalea Dominguez with English Translation"]. Petitioner is not a threat to his community; his priority is being present in his children's life and help care for his wife who is ill. [*Id*.]. Petitioner works long hours to support his family, whole simultaneously caring for his wife. Petitioner takes his wife by taking her to her doctor appointments, helps her with their children and still works to provide for them. [*Id*.]. Petitioner shows his positive and helpful nature by the support he shows his children and wife. [*Id*.]. Petitioner abides by the law and is helpful towards law enforcement. Therefore, Petitioner can show that he does not meet this prong to justify civil detention.

56. Second, Petitioner does not pose a risk of flight. Petitioner has strong family and community ties in the United States. Petitioner has lived in the United States for more than two decades and is steadily employed. Petitioner is the father of three U.S. citizen children and is dedicated to supporting his family, his youngest daughter is just five years old. It is clear that Petitioner's priority is remaining in the United States with his family and wife who is ill. In addition, Petitioner has also demonstrated compliance with court proceedings as he has litigated motions and applications for relief through EOIR. This adherence to the law shows that Petitioner does not pose a risk of flight because he is disposed to go through the proper avenues to secure immigration relief. Petitioners' strong family and community ties show his responsibility to deter flight. In addition, these strong ties with his community show that he would continue to comply with any condition of release.

57. For these reasons, Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment, and he must be immediately released.

COUNT FOUR

58. If he prevails, Petitioner requests attorney's fees and costs in the amount of $5,000 under the

Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

(1) Assume jurisdiction over this matter.

(2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.

(3) Declare that Petitioners' detention violates the Immigration and Nationality Act, Due Process Clause of the Fourth Amendment, Due Process Clause of the Fifth Amendment.

(4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately.

(5) Enjoin Respondents from further unlawfully detaining Petitioners.

(6) Grant a writ of habeas corpus ordering Respondents to immediately release Petitioners from custody.

(7) In the alternative, grant a writ of habeas corpus ordering Respondents to immediately release Petitioners from custody under reasonable conditions of supervision.

(8) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law and

(9) Grant any further relief this Court deems just and proper.

Respectfully submitted,

/s/Alfonso Morales
Alfonso Morales, Esq.
Attorney for Christobal Dominguez Amador

Dated: November 20, 2025

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Christobal Dominguez Amador, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 20th day of November 2025.

/s/Alfonso Morales
Alfonso Morales, Esq.
Attorney for Petitioner Christobal Dominguez Amador

CERTIFICATE OF SERVICE

I, undersigned counsel, hereby certify that on this date, I filed this Petition for Writ of Habeas Corpus and all attachments electronically through the CM/ECF system, which constitutes service on all parties or counsel by electronic means as reflected on the Notice of Electronic Filing.

I will furthermore mail a copy by USPS Certified Priority Mail with Return Receipts to each of the following individuals:

- **George Dedos, Warden of the Torrance County Detention Center**
  Attn: Warden
  Post Office Box 3540
  Milan, NM 87021

- **Mary De Anda-Ybarra, ICE ERO Field Office Director**
  ICE El Paso Field Office
  11541 Montana Ave Suite E
  El Paso, TX 79936

- **Kristi Noem, Secretary U.S. Dept. of Homeland Security**
  245 Murray Lane SW
  Washington, DC 20528

- **Pamela Bondi, Attorney General U.S. Dept. of Justice**
  950 Pennsylvania Ave NW
  Washington, DC 20530

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

Executed this 20th day of November 2025 at Paramount, CA

/s/Alfonso Morales
Alfonso Morales, Esq.
Attorney for Petitioner Christobal Dominguez Amador