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6 UNITED STATES DISTRICT COURT  
7 EASTERN DISTRICT OF CALIFORNIA  
8 FRESNO DIVISION

9 Cristian Amaya-Quinteros,  
10  
11 Petitioner,

Case Number: 1:25-cv-01672-AC

**Petitioner's Reply**

12 v.

13 CORECIVIC, INC., a Maryland corporation,  
14 operating the California City Detention  
15 Facility; Kristi NOEM, Secretary of the  
16 Department of Homeland Security; Pamela  
17 BONDI, U.S. Attorney General; in their  
18 official capacity; Moises BECERRA, in his  
19 official capacity as Field Office of  
20 Immigration and Customs Enforcement,  
21 Enforcement and Removal Operations.<sup>1</sup>

22 Respondents.

23  
24 Petitioner, Cristian Amaya-Quinteros ("Petitioner"), respectfully submits this reply in  
25 support of his petition for writ of habeas corpus (the "Petition").

26 **PRELIMINARY STATEMENT**

27  
28 Petitioner is not properly classified as a detainee under 8 U.S.C. § 1225, as the expedited  
removal proceedings initiated against him were effectively abandoned shortly after they began.

Following his release from detention on January 31, 2022, DHS issued a Notice of Custody

<sup>1</sup> The Attorney General, the Secretary of the DHS, or the ICE Field Officer Director are the proper respondents despite the immediate custodian rule in *Rumsfeld v. Padilla*, 542 U.S. 426 (2004). *Singh v. Holder*, 638 F.3d 1196 (9th Cir. 2011).

1 Determination under § 236 of the Immigration and Nationality Act, releasing Petitioner. *See*  
2 [Doc 1] Pet'r Exh. F. The Government has offered no documents indicating he was released on  
3 parole that would justify his mandatory detention upon a revocation. *Matter of Q. Li.* 29 I&N  
4 Dec. 66, 69-70 (BIA 2025). In any event, Petitioner's removal is not reasonably foreseeable  
5 because he is eligible for discretionary relief based on his Special Immigrant Juvenile Status -  
6 that remains approved - and he has been granted parole that renders inapplicable any ground of  
7 inadmissibility that might otherwise apply.<sup>2</sup> *See* [Doc 12] Resp't Exh. 4; 8 U.S.C. § 1255(h).  
8 Consequently, the detention imposed under the theory of § 1225 is both procedurally and  
9 substantively unjustified. The expedited removal proceedings have been vacated. *See* [Doc 12-1]  
10 Resp't Exh. 5. *See also* 8 C.F.R. § 1208.30(g)(2)(iv)(B).

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13 **I. Petitioner Cannot Properly Be Considered an Applicant for Admission.**

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Petitioner should not have been subjected to “ongoing” expedited-removal proceedings  
under 8 U.S.C. § 1225(b)(1) that took four years to complete, as such proceedings ceased to be  
“expedited.” *See* Government Brief [Doc 12] at 1 [characterizing proceedings as “ongoing.”]  
Petitioner cannot properly be considered an “applicant for admission” under 8 U.S.C. §  
1225(b)(2) indefinitely based on a brief encounter with DHS four years earlier where the  
Government kept him in custody between November 21, 2021 and January 31, 2025. *See* Exh. O  
Initial I-213, [Doc 1] Exh. F. There is nothing in the record that explains what custody status  
Petitioner had between November 21, 2021 to January 26, 2022 when he was processed for  
expedited removal or what transpired that led to his release on January 31, 2022.

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<sup>2</sup> The Government's brief [Doc. 12] at 2 mistakenly stated “Petitioner's Special Immigrant Juvenile status and deferred action were revoked on December 2, 2025, meaning that 8 U.S.C. § 1255(h) is not applicable...” The Government's evidence [Doc 12-1] Exhibit 4, a termination notice from USCIS provides, “USCIS approved your Form I-360, which granted you SIJ classification on June 26, 2023, and it remains approved.”

1 Petitioner—who remains a Special Immigrant Juvenile Status beneficiary—was detained  
2 in San Francisco, California after having resided in the United States for four years. He was  
3 released pursuant to DHS’s Notice of Custody Determination under INA § 236 on January 31,  
4 2022. *See* [Doc 1] Pet’r. Exh. F. DHS did not treat Petitioner as detained under INA § 235(b),  
5 upon his release which is further demonstrated by the fact that he was not released on parole  
6 under INA § 212(d)(5)(A). There are no documents presented by the Government that prove that  
7 the DHS paroled him, but rather released him for health reasons based on a review pursuant to a  
8 lawsuit, *Frailhat v. ICE*, --- F. Supp. 3d ---, 2020 WL 1932570 (C.D. Cal. Apr. 20, 2020). *See*  
9 [Doc 1] Pet’r Exh. F. It appears that the expedited-removal proceedings initiated on January 26,  
10 2022 and referred for a credible-fear screening were effectively abandoned five days later when  
11 DHS released him into the United States on January 31, 2022. Although Petitioner was  
12 apprehended within 100 miles of the land border by the DHS on November 21, 2021, he was not  
13 processed for expedited removal and a credible fear referral until January 26, 2022. *See* Exh. O  
14 Initial I-213. This is significant because it demonstrates the irregularity in the handling of  
15 Petitioner’s custody status that makes the Government’s authority confusing to justify continued  
16 detention.  
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21 **II. Petitioner Is Not Subject to Mandatory Detention Under 8 U.S.C. § 1225 Because He**  
22 **Was Taken Into Custody in the Interior of the United States After Remaining for**  
23 **Four Years.**

24 Petitioner does not fall under the statutory detention scheme in INA § 235(b), which  
25 mandates detention of applicants for admission until the conclusion of specified proceedings.  
26 *Jennings v. Rodriguez*, 583 U.S. 281, 299 (2018); *Matter of Q. L-I-*, 29 I&N Dec. 66, 68 (BIA  
27 2025). Petitioner also cannot properly be charged as an “applicant for admission” because *Torres*  
28 *v. Barr*, 976 F.3d 918, 930 (9th Cir. 2020), held that 8 U.S.C. § 1182(a)(7) cannot apply to all

1 noncitizens present without valid admission documents *at all times*, as such an interpretation  
2 would render § 1182(a)(6) redundant and superfluous. Current federal policy limits expedited  
3 removal processing to (1) Aliens who did not arrive by sea, who are encountered anywhere in the  
4 United States more than 100 air miles from a U.S. international land border, and who have been  
5 continuously present in the United States for less than two years; and (2) aliens who did not  
6 arrive by sea, who are encountered within 100 air miles from a U.S. international land border,  
7 and who have been continuously present in the United States for at least 14 days but for less than  
8 two years. Designating Aliens for Expedited Removal, 90 Fed. Reg. 8139 (Jan. 24, 2025).  
9  
10 Petitioner does not fall within any of those categories of noncitizens subject to expedited removal  
11 presently.  
12

13 In any event, Petitioner is no longer detained pursuant to expedited-removal proceedings  
14 under 8 U.S.C. § 1225(b)(1) because the asylum officer's negative credible-fear determination  
15 was vacated on review by the Immigration Judge on December 2, 2025. *See* [Doc 12-1] Resp't  
16 Exh. 5. *See* 8 C.F.R. § 1208.30(g)(2)(iv)(B) [If the immigration judge finds that the alien, other  
17 than an alien stowaway, possesses a credible fear of persecution or torture, the immigration judge  
18 shall *vacate* the Notice and Order of Expedited Removal and refer the case back to DHS]. As a  
19 result, DHS is required either to (1) serve Petitioner with a Notice to Appear and file it with the  
20 Immigration Court under INA § 240, or (2) refer the asylum application back to USCIS for an  
21 interview within the prescribed time period under 8 C.F.R. § 208.9(a)(1). *See* 8 C.F.R. §  
22 1208.30(g)(2)(iv)(B).  
23  
24

25 This Court retains jurisdiction because the Immigration Judge had no authority to review  
26 Petitioner's custody status in the course of the credible-fear review. 8 C.F.R. § 1003.42(g).  
27  
28 Petitioner's counsel has not been served, and Petitioner has not reported receiving a Notice to

1 Appear or any notification that his asylum application has been referred back to USCIS. At  
2 present, it is unknown whether DHS intends to commence INA § 240 removal proceedings or  
3 permit Petitioner to continue with his previously filed asylum application before USCIS. Despite  
4 the vacating of the negative credible finding, Respondent insists that “Petitioner is detained  
5 under INA § 235(b) because he is subject to expedited removal.” See [Doc 12] Resp’t  
6 Declaration of Deportation Officer Patrick J. Cruz ¶ 15. Expedited removal proceedings have  
7 been vacated and under the regulatory scheme, Petitioner is awaiting further processing of his  
8 asylum application before the Immigration Judge or USCIS.  
9  
10

11 **III. Even If Petitioner Were Subject to Mandatory Detention, His Removal Is Not**  
12 **Reasonably Foreseeable Because He Is Eligible for Adjustment of Status After**  
13 **Being Granted Parole That Renders Inapplicable the Grounds of Inadmissibility**  
14 **Charged Against Him.**

15 Despite the procedural irregularities in Petitioner’s case, he remains a beneficiary of  
16 Special Immigrant Juvenile Status, which prevents DHS from deeming him inadmissible under 8  
17 U.S.C. § 1182(a)(7)(A). See 8 U.S.C. § 1255(h) [special immigrants described in 1101(a)(27)(J)  
18 are deemed paroled and certain inadmissibility grounds shall not apply]. The Ninth Circuit has  
19 held that “SIJ status is a form of parole that confers eligibility for adjustment to LPR status.”  
20 *Murillo-Chavez v. Bondi*, 128 F.4th 1076, 1085 (9th Cir. 2025). On November 19, 2025, the  
21 United States District Court for the Eastern District of New York in *A.C.R. et al., v. Kristi Noem,*  
22 *et al.*, 1:25-cv-03962-EK-TAM at 18 found that SIJS approval with grant for deferred action was  
23 “...much like DACA, SIJS-DA was ‘more than a non-enforcement policy’ – it was a “program  
24 for conferring affirmative immigration relief.” Relying on *Dep’t of Homeland Sec. v. Regents of*  
25 *the Univ. of Cal.*, 591 U.S. 1 at 18-19 (2020), the court reasoned: “USCIS solicited petitions for  
26 SIJS, which it also treated as applications for deferred action. The applicants had to meet  
27 enumerated criteria, as discussed above and below. 8 C.F.R. § 204.11(b). USCIS then established  
28

1 a standardized process for reviewing those applications, which would — if successful — result  
2 in deferred action for a defined period and the ability to seek work authorization. 2022 Policy  
3 Alert 2-3.” The court in *A.C.R.* granted in part and denied in part the rescission of the 2022 Policy  
4 Alert granting SIJS approvals deferred action. *Id.* at 48-49. The court also granted stays for SIJS  
5 recipients who were in removal proceedings. *Id.*

7 Respondent cites to *Demore v. Kim*, 538 U.S. 510 (2003) and *Jennings v. Rodriguez*, 583  
8 U.S. 281, 304 (2018) as supporting the Constitutionality of Petitioner’s detention but ignores that  
9 even if mandatory detention applies, it is authorized only “for the brief period necessary for ...  
10 removal proceedings ... of a noncitizen who had no substantial challenge to deportability.”  
11 *Demore*, 538 U.S. at 513-14. The Court did not address the constitutionality of mandatorily  
12 detaining noncitizens with substantial challenges to removability or substantial claims to  
13 discretionary relief.

15  
16 Petitioner is eligible for adjustment based on SIJ status, but visa availability will take  
17 years. [Doc 1] Pet’r Exh. J, L. Detaining Petitioner for years while he has been paroled under 8  
18 U.S.C. § 1255(h)(1) to await his priority date is arbitrary, especially where he has no interest in  
19 fleeing and has cooperated fully.

20  
21 In *Zadvydas v. Davis*, 533 U.S. 678 at 690 (2001), the Court held that detention raises  
22 serious constitutional concerns when its goal is “no longer practically attainable” due to  
23 unlikelihood of removal, and thus the detention ceases to bear a reasonable relation to its  
24 purpose. When detention becomes prolonged, due process requires heightened justification. The  
25 government’s interest here is nominal because Petitioner is not a danger or flight risk..  
26  
27  
28

1 **IV. Petitioner’s Continued Detention is Unjustifiable under *Mathews v. Eldridge*.**

2 In *Rodriguez Diaz v. Garland*, 53 F.4<sup>th</sup> 1189 at 1202 (9th Cir. 2022) the Ninth Circuit  
3 applied *Mathews v. Eldridge*, 424 U.S. 319 (1976) to uphold detention under § 1226(a) only  
4 because that statute guaranteed an individualized bond hearing at the outset and upon changed  
5 circumstances. These procedural protections are absent under § 1225(b). Petitioner has never  
6 received individualized custody review.  
7

8 Petitioner’s detention without individualized review is unreasonable under the *Mathews*  
9 due process test regardless of duration. Under *Mathews*, the private interest at stake—freedom  
10 from physical restraint—is weighty. The risk of erroneous deprivation is high without a hearing,  
11 and the value of additional procedure is substantial. Government interests in avoiding  
12 individualized review are minimal.  
13

14 First, Petitioner has an overwhelming liberty interest, as any detention implicates core  
15 constitutional protections. *Denmore* left it an open question whether noncitizens eligible for  
16 other forms of relief could be mandatorily detained without further procedural protections.  
17 Petitioner has Special Immigrant Juvenile Status that has not been revoked and he remains  
18 eligible for adjustment of status to a lawful permanent resident, but for the lack of visas  
19 available. The Government arbitrarily revoked his deferred action that allowed him to continue  
20 working while awaiting visa availability. [Doc 12-1] Resp’t Exh. 4.  
21

22 Petitioner’s private interest in avoiding erroneous mandatory detention is weighty not  
23 only because physical liberty is at stake, but also because the conditions under which he is being  
24 confined are actively harming him. *See* Exh. P Declaration Regarding California City  
25 Correctional Facility. The record shows that detainees at California City Correctional Facility are  
26 subjected to persistent cold, inadequate bedding, nutritionally deficient meals, and unreliable  
27  
28

1 access to essential medical care. *See* Exh. P ¶ 2.A.-R. These are not abstract or generalized  
2 complaints but consistent reports from multiple detainees, corroborated by observations, that the  
3 facility’s environment is harsh, unsafe, and degrading. *See* Exh. P ¶ 2.A.-R. Confinement in such  
4 conditions is not a mere deprivation of freedom—it is an exposure to conditions that threaten  
5 health, sleep, bodily integrity, and psychological well-being.

7 The extreme cold alone imposes a substantial and ongoing injury. *See* Exh. P ¶ 2.A.-C.  
8 Detainees report that the housing units remain so cold that they are forced to sleep with their  
9 shoes on, layer thin sheets that provide no warmth, and use clothing as makeshift insulation—  
10 only to be reprimanded by staff for doing so. *See* Exh. P ¶ 2.A.-C., O., R. These conditions are  
11 incompatible with basic human dignity and pose a significant risk to physical health, especially  
12 for individuals—like Petitioner—who have limited ability to mitigate cold while detained.  
13 Exposure to prolonged cold is a recognized driver of respiratory illness, sleep deprivation, and  
14 chronic stress.  
15

17 The inadequate and nutritionally deficient food similarly harms Petitioner’s physical  
18 health. Exh. P ¶ 2.D.-F. Multiple detainees report being served the same nutritionally barren  
19 meals every day—primarily pasta, beans, and burned rice—sometimes with visibly contaminated  
20 water or expired milk that has made detainees ill. Exh. P ¶ 2.D.-E. At least one detainee  
21 developed bleeding gums after a month of detention, indicative of nutritional deficiency. Exh. P  
22 ¶ 2.E. This is not merely unpleasant food; it is food that fails to meet basic nutritional standards  
23 and undermines health. For a detainee who relies entirely on the government for sustenance, the  
24 state’s failure to provide adequate nutrition directly magnifies the harm of erroneous detention.  
25

27 Petitioner’s private interest is further amplified by the systemic denial or delay of medical  
28 care. Exh. P ¶ 2. I.-M. Detainees with chronic conditions report going weeks without medication,

1 having critical procedures such as biopsies refused. Exh. P ¶ 2.H., J. Others describe  
2 hypertension left unchecked, uncontrolled diabetes, and being told to wait months for essential  
3 evaluations. Exh. P ¶ 2. I.-M. The risk of serious, irreversible harm is obvious: untreated chronic  
4 illness, preventable complications, and the psychological trauma associated with an atmosphere  
5 of intimidation that deters detainees from requesting care at all. Exh. P ¶ 2. P. These conditions  
6 render each additional day of detention not merely a restriction on liberty but a profound threat to  
7 health and safety.  
8

9  
10 Taken together, these conditions make clear that Petitioner's private interest under  
11 Mathews is extraordinarily high. His detention is not occurring in a constitutionally adequate  
12 environment; it is occurring in conditions that impose daily physical suffering, risk of illness,  
13 disruption of sleep, nutritional deprivation, and fear of retaliation for requesting basic necessities.  
14 The Constitution does not permit the government to detain a person under a mandatory-detention  
15 theory that does not lawfully apply to him while simultaneously subjecting him to conditions that  
16 jeopardize his health. Because the harm is ongoing, concrete, and severe, the private-interest  
17 factor strongly favors meaningful procedural safeguards and correction of DHS's erroneous  
18 custody determination.  
19

20  
21 Second, Petitioner faces a high risk of erroneous deprivation because he has been  
22 granted parole that makes the grounds of inadmissibility inapplicable to him. 8 U.S.C. § 1255(h).  
23 If this case results in a notice to appear for removal proceedings before the Immigration Judge,  
24 the IJ has the authority to terminate proceedings where "no charge of...inadmissibility...can be  
25 sustained." 8 C.F.R. § 1003.1(d) To continue detaining Petitioner for removal proceedings where  
26 he has an opportunity for relief that makes the underlying grounds of inadmissibility inapplicable  
27 risks an erroneous removal. Petitioner should be permitted to remain out of custody to pursue his  
28

1 affirmative asylum application previously filed with the USCIS pending his visa availability.  
2 [Doc 1] Pet'r Exh. G. If his asylum application is denied before USCIS, he should be placed in  
3 removal proceedings before the Immigration Judge to pursue asylum or seek administrative  
4 closure or termination of removal proceedings under the factors listed in 8 C.F.R. § §  
5 208.14(c)(1), 1003.18(c),(d). In those future proceedings before the Immigration Judge,  
6 Petitioner could move to close the case based on the availability of his adjustment of status as the  
7 time nears.  
8

9 Third, the Government's interest in detaining Petitioner for months on end without  
10 review is low because he has been cooperating with immigration authorities and is not a  
11 criminal.  
12

13 In sum, the *Mathews* factors establish that Petitioner is entitled to a bond hearing  
14 and/or release to attend an asylum interview with USCIS or removal proceedings if DHS elects  
15 to serve and file a notice to appear with the immigration court.  
16

17 **CONCLUSION**

18 For the foregoing reasons, this Court should order Petitioner's release under reasonable  
19 conditions or, alternatively, order a bond hearing to determine whether continued detention is  
20 justified, and for such other and further relief as the Court deems just and reasonable.  
21

22 Date: December 5, 2025

Respectfully Submitted,


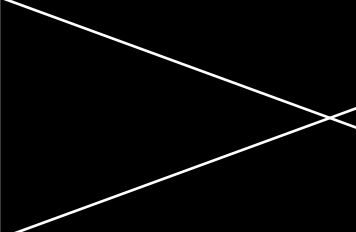
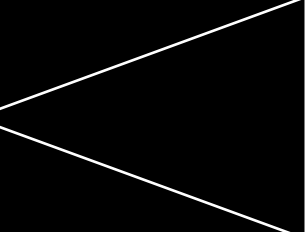
23 /s/ Mario Salgado  
24 Mario Salgado, Esq.  
25  
26  
27  
28

**Exh. O**

U.S. Department of Homeland Security

Subject I [REDACTED]

Record of Deportable/Inadmissible Alien

Family Name (CAPS) <b>AMAYA-QUINTEROS, CRISTIAN</b>		Sex <b>M</b>	Hair <b>BLK</b>	Eyes <b>BRO</b>	Cmp/vis <b>MED</b>
Country of Citizenship <b>EL SALVADOR</b>	Passport Number and Country of Issue [REDACTED]	Height <b>65</b>	Weight <b>115</b>	Occupation <b>Laborer</b>	
U.S. Address [REDACTED]		Sears and Marks			
Date, Place, Time, at <b>11/21/2021</b> , [REDACTED]	(b)(7)(e)	Passenger Boarded at			
Number, Street, City, Province (State) and Country of Permanent Residence <b>EL SALVADOR</b>		F.O.I. Number [REDACTED]			
Date of Birth [REDACTED]	Age: <b>20</b>	Date of Action <b>11/21/2021</b>	Location Code <b>LRT/LRN</b>		
City, Province (State) and Country of Birth <b>CABANAS, EL SALVADOR</b>	AR <input checked="" type="checkbox"/>	Forms: (Type and No.) Lified <input type="checkbox"/> Not Lified <input type="checkbox"/>			
NIV Issuing Post and NIV Number	Social Security Account Name				
Date Visa Issued	Social Security Number				
Immigration Record <b>NEGATIVE</b>	Criminal Record <b>None Known</b>				
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)			Number and Nationality of Minor Children <b>1 - EL SALVADOR</b>		
Father's Name, Nationality, and Address, if Known <b>See Narrative</b>		Mother's Present and Maiden Names, Nationality, and Address, if Known <b>See Narrative</b>			
Monies Due/Property in U.S. Not in Immediate Possession <b>None Claimed</b>	Fingerprinted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Systems Checks <b>See Narrative</b>	Charge Code Word(s) <b>I6A</b>		
Name and Address of (Last/Current) U.S. Employer	Type of Employment	Salary	Employed From/To		
Narrative (Outline particulars under which alien was treated/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.) <b>FINS # [REDACTED]</b>					
					
					
<b>ARREST COORDINATES:</b>					
Latitude:	(b)(7)(e)				
Longitude:	[REDACTED]				
<b>CONSEQUENCE DELIVERY SYSTEM:</b>					
Classification: <b>FIRA</b>					
Alien has been advised of communication privileges		11/21/2021		[REDACTED]	
Distribution:		Received: ( [REDACTED] )		[REDACTED]	
MATERIAL WITNESS		(b)(7)(c)		[REDACTED]	
		on <b>November 21, 2021</b> at <b>1432</b> (time)		Disposition <b>Warrant of Arrest/Notice to Appear</b>	
		Examining Officer: [REDACTED]		[REDACTED]	

U.S. Department of Homeland Security

Continuation Page for Form

1213

Alien's Name AMAYA-QUINTEROS, CRISTIAN	File Number 	Date 11/21/2021
---	---	--------------------

ARRESTING AGENT:



(b)(7)(c)

FATHER NAME AND ADDRESS:

Nationality: EL SALVADOR AMAYA-VARGAS, VICTOR MANUEL

MOTHER NAME AND ADDRESS:

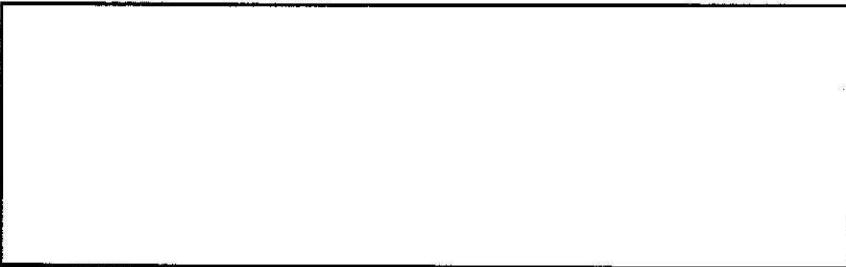
Nationality: EL SALVADOR QUINTEROS, ROSALINA

FUNDS IN POSSESSION:

Mexican Peso 11.00

*KCMAG*

RECORDS CHECKED:



(b)(7)(e)







NARRATIVE:

ENCOUNTER:

(b)(7)(e)

(b)(7)(c)

(b)(7)(e)

On November 21, 2021, I, Border Patrol Agent (BPA)  conducting my assigned duties at Highway 35 Checkpoint  Texas. At 9:15 a.m., I was performing duties at primary truck lane 1 when a 2019 Penske rental truck  bearing Virginia plates  approached my position. I greeted the driver and asked if the back of the rental truck was sealed, and the driver responded with "no". I then asked the driver if I can look in the back, and he replied with "yeah go ahead". As I walked to the back to the rental truck, I called K9 handler BPA  to conduct a non-intrusive inspection with his K9. As we approached the back of the rental truck, we discovered that the back was locked with a silver lock. BPA 

(b)(7)(e)

Signature (b)(7)(c)		Title <i>USBPA</i> (b)(7)(c)
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Alien's Name AMAYA-QUINTEROS, CRISTIAN	File Number (b)(7)(c)	Date 11/21/2021 (b)(7)(c)
---	--------------------------	------------------------------

conducted a non-intrusive canine sniff inspection of the vehicle. BPA informed me that his Service canine, had alerted to the possible presence of narcotics or concealed humans. I went back and told the driver that the back was locked. He responded, "oh yeah I forgot". I then asked the driver if he had the key to the lock and if I could open it. The driver handed me the key to the lock. As we opened the back, we discovered 19 non-citizens sitting inside the rental truck. No commodities were discovered inside the rental truck. I then rushed to the front of the rental truck and told the driver to step out of the rental truck and detained the driver. I escorted the driver inside the Laredo North Checkpoint for further processing.

ARREST:

(b)(7)(c)

Further immigration inspection identified the driver as The subjects inside the rental truck were identified as AMAYA-Quinteros, Cristian from El Salvador

[Redacted]

who were in the United States illegally.

(b)(7)(c)

(b)(7)(c) (b)(7)(e)

RECORD CHECKS:

[Redacted]

AMAYA-Quinteros, Cristian was processed through E3/IDENT/IAFIS system. Records check revealed no criminal history.

(b)(7)(c) (b)(7)(e)

Signature	[Redacted]	Title USMPA
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(b)(7)(C) (b)(7)(E)

U.S. Department of Homeland Security

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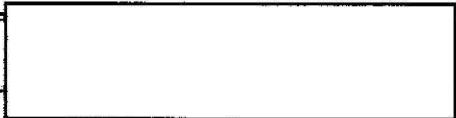
I213

Alien's Name  
AMAYA-QUINTEROS, CRISTIAN



Date  
11/21/2021

Signature



Title  
USCPA

U.S. Department of Homeland Security

(b)(7)(c) (b)(7)(e)


Continuation Page for Form

1213

Alien's Name AMAYA-QUINTEROS, CRISTIAN	File Number 	Date 11/21/2021
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DISPOSITION:

2019 Penske rental truck will be remitted and a 6051S will be generated.

HSI SA  is responding to the case.

(b)(7)(c) (b)(7)(e)

(b)(7)(c)

(b)(7)(c)

Signature

Title

LEBIA

**Exh. P**

**DECLARATION OF JENNIFER LOVE SPROCK, ESQ. REGARDING CONDITIONS  
AT CALIFORNIA CITY CORRECTIONAL FACILITY**

I, Jennifer Love Sprock, declare under penalty of perjury and under the laws of the United States of America that the following is correct and true:

1. I am aware that our office currently represents numerous clients who are detained at the California City Detention Facility. I have not personally interviewed each of these detained clients, but I have reviewed detailed interview notes prepared by my colleagues documenting their first-hand descriptions of conditions in the facility. In my review of the notes, the conditions described in these reports are consistent with one another and with the information I have personally received from another client detained at the same facility, as well as with my own observations of that client's physical condition and the effects of detention.

2. I offer as proof of jail conditions the following summary of interview statements provided by current client detainees who are in the California City Correctional Facility. Due to the current detainees' status in custody, signed declarations were not possible for presentation at the time of the reply brief filing. Signed declarations will be obtained forthwith and if possible before the hearing set for December 8, 2025 at 11:00 a.m.:

A. Across multiple clients, the most consistent complaint is that the housing units are kept extremely cold and that detainees are not provided adequate clothing or bedding to protect themselves from the low temperatures. One client reports that she is "always very cold," and she states that she's only allowed to purchase five bottles of water a week.

B. Another client states that he must sleep with his shoes on because it is so cold at night, that the thin sheets do not protect him from the cold, and that he has been coughing and unable to sleep because of the temperature.

C. Others describe that there is no functioning heat, that they have only two blankets and a jacket, and that even basic requests for an extra blanket are met with scolding by staff and

fear of punishment. Several clients have also reported going three days without hot water for showers.

D. Clients consistently report that the food at California City is both poor in quality and nutritionally inadequate. One client states that in approximately six weeks she was served meat (chicken) only once, and that the daily meals otherwise consist largely of pasta and beans with little or no protein.

E. Another client (whose gums were bleeding after a month of detention) states that they are given only burned rice and celery with pasta, food with “no nutritional value.” That client also states that they only drink tap water, which is white (not clear). That client was also served expired milk, which she drank before seeing the expiration date, and which made her ill.

F. Another client reports that “every day we are given spaghetti,” and others describe that “the food is terrible” and that the menu is always the same. Clients describe being almost constantly in pain or unwell while detained and attribute at least part of this to the poor diet and lack of variety in the food.

G. Multiple clients with serious or chronic medical conditions report significant delays and barriers to receiving appropriate medical care. One client has an expired contraceptive implant in her arm; she reports that facility staff told her she had no right to have it removed even though it is now affecting her health and her ability to eat.

H. Another client needs a biopsy and was told it could not be done.

I. Another client with longstanding hypertension states that her blood pressure was measured at 250 upon arrival, that she did not receive blood pressure medication until about a week later, and that her blood pressure has not been rechecked for approximately two weeks at a time.

J. A different client with diabetes, arthritis, and other chronic conditions reports that she waited around fifteen days before receiving medication for her diabetes and pain, despite experiencing pain in her arms and legs and significant cold-related discomfort.

K. Another client reports daily headaches and severe anxiety, stating that it took about a month before she received medication for her headaches and that she sleeps only three to four hours per night.

L. Another client who suffers from migraines has been denied medication. She reports that the detainees must stay “as healthy as possible” and do “whatever they can” to avoid going to the medical clinic, because if they enter the doors of the clinic, they are told “you are outside the system now” and subjected to abuse there. She reports that detainees in the clinic are made to “strip naked” and stay “on hands and knees” on the floor in a very cold room for long periods of time. She also reports that another detainee had their “hands and feet shackled” while in the clinic.

M. One client with kidney disease and fluid retention reports that she has not been able to see a doctor for proper follow-up and has only been given pain medication, and another reports being told she must wait six months for an eye appointment despite worsening vision.

N. Clients also describe unsafe and degrading sleeping conditions. Several report that people have fallen from the upper bunks, leading some detainees to sleep on the floor to avoid injury. One client explains that she sometimes sleeps on the floor for fear of falling but that she is also afraid to use extra clothing or bedding for cushioning because staff have warned detainees they can be written up for “damaging” uniform items.

O. Others report that the constant cold and lack of adequate bedding force them to improvise, such as using socks as gloves, only to be ordered by officers to remove them and accused of damaging “federal property.”

P. The environment described by our clients can be described as punitive and intimidating. Several clients report that when ICE officers come to the facility, they are “very rude” and that detainees feel heightened fear and intimidation on those days.

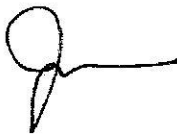
Q. One client reports being held for approximately six hours in a vehicle during transport to the facility.

R. Clients describe that “the more you ask for things, the more they punish you,” and that basic requests—for example, for a blanket or for hot water—are met with scolding or other forms of retaliation, causing detainees to avoid asking for needed items. Several clients refer to the constant confinement and monotonous daily routines, contributing to anxiety, insomnia, and a sense of hopelessness.

2. Based on my review of these client reports, and my own experience representing individuals detained at the California City Detention Facility, I am aware that multiple clients have independently described extremely cold temperatures, inadequate bedding and clothing, poor and monotonous food, delayed and insufficient medical care, unsafe sleeping arrangements, and a pervasive atmosphere of intimidation and retaliation when detainees request basic necessities. The consistency of these reports, together with the information I have personally received from another detained client, leads me to believe that these are systemic conditions at the facility rather than isolated incidents.

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

Date: December 5, 2025-12-05

Signature:   
Jennifer Love Sprock, Esq.

**CERTIFICATE OF SERVICE**

I, Mario Salgado, am over the age of 18 years and maintain a business address located at 605 Market Street Suite 1111 in San Francisco, California 94105. I electronically served the **Petitioner's Reply** to the parties listed in ECF.

Date: December 5, 2025

/s/ Mario Salgado  
Mario Salgado, Esq.

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