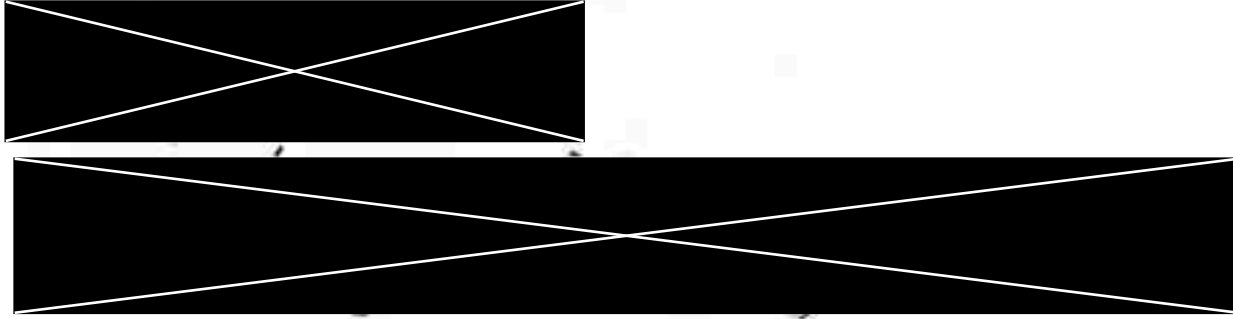
  
DEC 1 2025 AM 9:33  
FILED - USDC - NDTX - AM

HAYVER GUTIERREZ



UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS – AMARILLO DIVISION


**Court Address:**

United States District Court  
205 SE 5th Avenue, Room 133  
Amarillo, TX 79101-1559

**Assigned Judge:** \_\_\_\_\_

**Case Number:** \_\_\_\_\_

## PETITION FOR WRIT OF HABEAS CORPUS

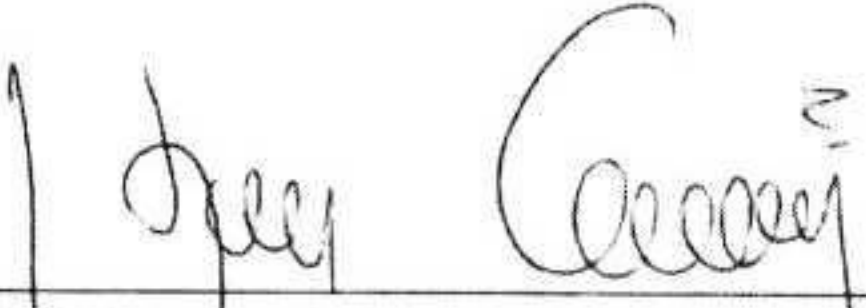
I, **Hayver Gutierrez**, residing at  Tulsa, OK 74134, respectfully submit this Petition for Writ of Habeas Corpus on behalf of: **Detainee Name:** Merly Fernanda Chaparro Guerrero

**A-Number:** 

**Detention Center:** Bluebonnet Detention Facility

The detainee was arrested on **November 7, 2025** and remains in the custody of DHS/ICE. She signed a voluntary departure without having proper legal counsel or fully understanding the consequences, constituting a violation of her constitutional right to due process. The petitioner respectfully asks this Honorable Court to review the legality of her continued detention and to order her **immediate release** while the circumstances of her immigration case are resolved.

**Date:** November 22, 2025



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**Petitioner's Signature:** Hayver Gutierrez

**Instructions for Mailing:**

Send this petition by certified mail to the Federal District Court listed above. Include copies of any supporting documents such as evidence, letters of support, or immigration documentation.

## UPDATED PETITION STATEMENT

### Additional Case Facts:

The detainee, **Merly Fernanda Chaparro Guerrero**, currently has a **pending political asylum case**. Her immigration court hearing was originally scheduled for **February 2028**. However, ICE unilaterally moved her hearing to **December 9, 2025** without proper notice or justification.

She has complied with all immigration requirements and has appeared **voluntarily** to every scheduled ICE check-in over the years. On her most recent scheduled appointment, she presented herself as instructed, and she was **arrested inside ICE facilities** despite being fully compliant.

She poses **no threat to public safety**. She has stable employment, pays taxes, possesses a valid work permit, and holds a legitimate Social Security number. She has **no criminal record** of any kind.

These facts demonstrate that her detention is unnecessary, punitive, and a violation of due process and proportionality under U.S. immigration law.

## LETTER OF SUPPORT AND FINANCIAL SPONSORSHIP

To Whom It May Concern,

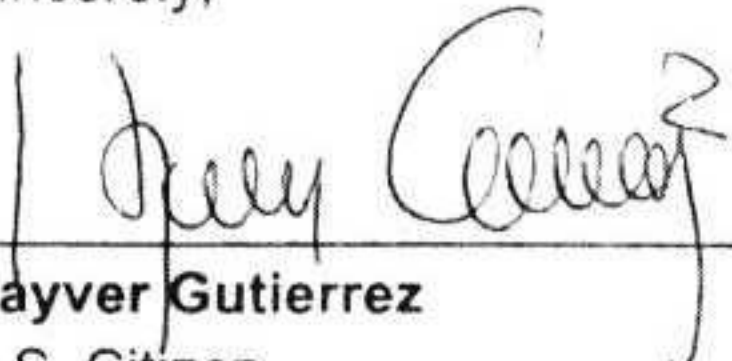
My name is **Hayver Gutierrez**, a United States citizen. I am providing this letter as a formal statement of support for **Merly Fernanda Chaparro Guerrero**.

I affirm the following:

- I am her current partner, and we are planning to get married in the near future.
- I will provide her with stable housing, food, transportation, and all basic needs during the entirety of her immigration process.
- I will ensure she complies with all court obligations, ICE requirements, and legal proceedings.

Merly is a responsible, honest, hardworking woman who has never represented any danger or risk to the community. Her detention is causing unnecessary hardship, and I respectfully request her immediate release.

Sincerely,

  
\_\_\_\_\_  
**Hayver Gutierrez**  
U.S. Citizen