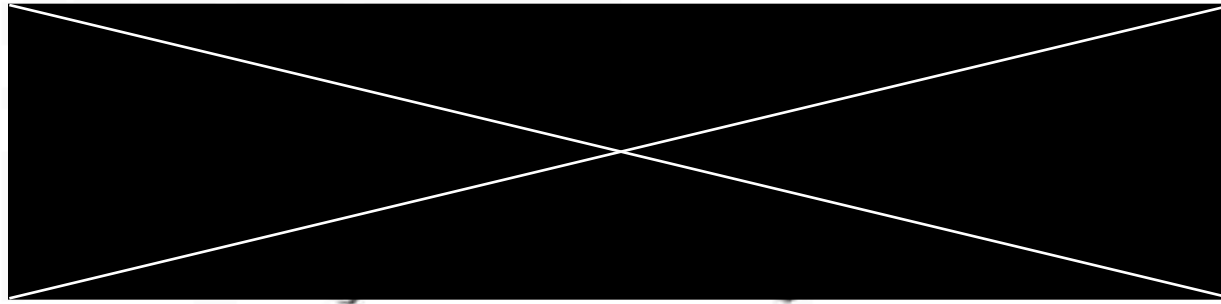

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FILED - USDC - NDTX - AM

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

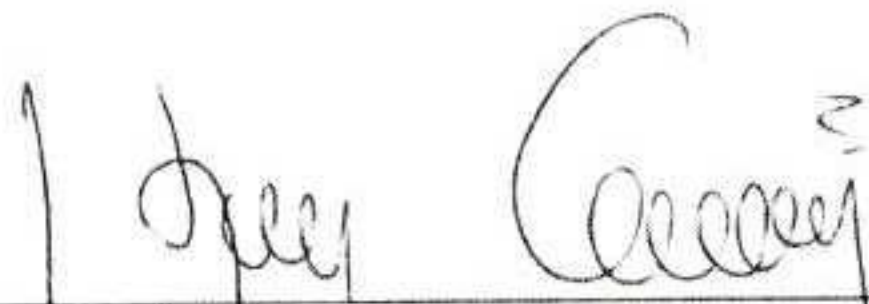
I, **Hayver Gutierrez**, residing at  **Tulsa, OK 74134**, respectfully submit this Petition for Writ of Habeas Corpus on behalf of: **Detainee Name:** Merly Fernanda Chaparro Guerrero

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



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,

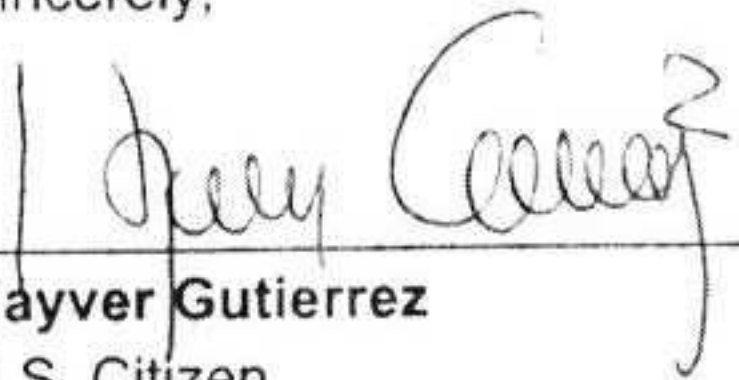
My name is **Hayver Gutierrez**, a United States citizen. I am providing this letter as a formal statement of support for **Merly Fernanda Chaparro Guerrero**.

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