

DETAINED

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THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
SEATTLE, WASHINGTON

RICARDO LOPEZ REYES,

Petitioner,

v.

PAMELA BONDI, *et al.*;

Respondents.

Case No.: 2:25-cv-02525-JNW-MLP

Agency File Number:

**PETITIONER'S TRAVERSE IN SUPPORT OF
PETITION FOR WRIT OF HABEAS CORPUS
AND RESPONSE TO RETURN**

Noted for consideration: December 26, 2025

PETITIONER'S TRAVERSE AND RESPONSE TO RETURN

I. INTRODUCTION

The Court must grant Petitioner's writ of habeas corpus unless the Respondents show cause why it should not. 28 U.S.C. § 2243. Respondents' return must certify the "true cause" of their ongoing deprivation of Petitioner's liberty. *Id.*, see Respondents' Return (hereinafter "Return"), ECF 6. Respondents do not dispute that their stop, arrest and detention of Petitioner was unlawful. Respondents' claim of current custody authority over Petitioner is also unlawful. Respondents may not base custody determinations on information obtained as "fruit of the poisonous tree" of an unlawful arrest.

II. ARGUMENT

A. This Court Has Jurisdiction Over Petitioner's Constitutional Claims

Respondents argue that this Court lacks authority under provisions of the Immigration and Nationality Act (INA) at 8 U.S.C. § 1252 fails for multiple reasons. To begin, the Suspension Clause of the Constitution preserves habeas jurisdiction for constitutional claims. Second, the INA does not bar jurisdiction as claimed. Lastly, a petition for review is an inadequate remedy for current constitutional violations.

(1). The Suspension Clause Preserves Habeas Jurisdiction for Constitutional Challenges to Custody

Even if the INA would ordinarily limit this Court's jurisdiction, the Court retains jurisdiction over Petitioner's core habeas claims pursuant to the Suspension Clause of the U.S. Constitution, which provides that "[t]he Privilege of the Writ of Habeas Corpus shall not be suspended, unless when in Cases of Rebellion or Invasion the public Safety may require it." U.S.

1 Const. Art. I § 9, cl. 2.¹ The Ninth Circuit has recognized that the Suspension Clause is
2 triggered when, as here, a petitioner requests release from custody. *Rauda v. Jennings*, 55 F.4th
3 773, 780 (9th Cir. 2022) (internal citations omitted).

4 **2) The INA does not bar jurisdiction over Petitioner's claim**

5 Respondents argue that Petitioner's constitutional claims are properly brought in a
6 petition for review according to the INA. However, Petitioner challenges Respondents' ongoing,
7 unlawful custody over his person.

8 **a. This Court's jurisdiction is not barred by 8 U.S.C. § 1252(g).**

9
10 Section 1252(g) bars review when DHS exercises its discretion to "commence
11 proceedings, adjudicate cases, or execute removal orders." See *Reno v. American Arab*
12 *Anti-Discrimination Committee*, 525 U.S. 471, 482-83 (1999). The provision is "narrow"
13 and applies only to these three discrete actions, not to the "many other decisions or
14 actions that may be part of the deportation process." *Id.* at 482. The 1st Circuit found that
15 "§ 1252(g) did not bar judicial review of challenges to unlawful detention." See *Kong v.*
16 *United States*, 62 F.4th 608, 617 (1st Cir. 2023). The 9th Circuit held that "§ 1252(g)
17 does not prohibit challenges to unlawful practices merely because they are in some
18 fashion connected to removal orders." See *Ibarra-Perez v. United States*, 154 F.4th 989,
19 997 (9th Cir. 2025). None of these actions are at issue here.
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25 ¹ The Supreme Court has construed the INA narrowly to avoid serious constitutional questions. See *INS v. St. Cyr*,
26 533 U.S. 289, 300, 305 (2001).

b. Petitioner does not challenge his removal order since it does not exist.

Section 1252(b)(9) does not prevent federal courts from hearing cases “that do not directly challenge a final order of removal.” See *Trinidad y Garcia v. Thomas*, 683 F.3d 952, 958 (9th Cir. 2012) (Thomas, J., concurring) (citing *Nadarajah v. Gonzales*, 443 F.3d 1069, 1075 (9th Cir. 2006)). The statute is a ‘targeted’ and ‘narrow’ provision. *Gonzalez v. U.S. Immigration and Customs Enforcement*, 975 F.3d 788, 810 (9th Cir. 2020) (quoting *Dep’t of Homeland Sec. v. Regents v. Univ. of Cal.*, 140 S. Ct. 1891, 1907 (2020)).

c. A petition for review is an inadequate remedy.

Petitioner challenges his present detention as unlawful. A petition for review in the Ninth Circuit cannot provide timely relief for unconstitutional custody occurring now. In *Jennings v. Rodriguez*, the Supreme Court held that district courts have habeas jurisdiction over constitutional challenges to immigration detention, even where those challenges relate to removal proceedings. 583 U.S. 281, 293-94 (2018).

The Court distinguished between statutory interpretation questions (which must proceed through petition for review) and constitutional challenges (which are properly heard in habeas). Petitioner’s Fourth Amendment is that constitutional challenge.

B. This Court should grant the relief requested because the Respondents have violated Petitioner’s Fourth Amendment rights from illegal arrest to the present.

Respondents provide no lawful basis of reasonable suspicion for their initial stop of Petitioner. Nor do Respondents offer any lawful basis of probable cause for Petitioner’s

warrantless arrest. Instead, Respondents argue that Petitioner's present custody is justified based on his unlawful arrest. The government cannot violate the Fourth Amendment to justify an arrest and then claim the subsequent custody is lawful merely because it discovered grounds for detention through that very violation. For these reasons, the writ should be granted.

(1). Respondents do not challenge Petitioner's claim that his stop and warrantless arrest was illegal.

Respondents do not seek to justify their stop and arrest of Petitioner under any alternate theory than that supplied by the petition – that they stopped Petitioner based on his appearance, handcuffed him, and took him into custody. The Petitioner never encountered Immigration and Customs Enforcement (ICE) officers crossing the border, nor has he applied for any immigration benefit prior to filing his asylum application on December 18, 2025. He has no criminal convictions and has never been fingerprinted for employment. However, he has registered his car in Oregon, and seven men were detained by ICE officers on November 8, 2025 in Seaside, Oregon, all of whom had brown or black skin.

Respondents allege in Form I-213 (Docket 6, Exh. B to Lambert Declaration) that as part of Operation Fortifying the Border, "ICE officers Armstrong and SDDO Fisher were parked near the 101 Highway in Seaside, OR, and observed the subject and his wife walking to his vehicle. *Subject was identified as having prior encounters with ICE officials and no status in the United States.*" Respondents offer no evidence that the Petitioner had prior encounters with ICE in the Return and accompanying exhibits. There is no information, photographs, evidence of a prior removal order or fingerprints taken by an immigration officer, which would support this

1 statement on Form I-213. The government cannot expect the Court to treat this statement about
2 the Petitioner as a fact without any supporting evidence.

3 Exhibit B to the Lambert Declaration has a box checked that an immigration
4 officer determined there was “probably cause” to believe the Petitioner was removable, because
5 of “biometric confirmation of the subject’s identity and a records check of federal databases that
6 affirmatively indicate, by themselves or in addition to other reliable information, that the subject
7 either lacks immigration status or notwithstanding such status is removable under U.S.
8 immigration law; ” However, on Form I-213, the redactions do not allow anyone, including this
9 Court, to know if any hits for the TECS/NCIC database were returned. The IDENT/IAFIS
10 database *may have returned a hit*, but it is redacted as well.

12 Respondents allege he had a prior encounter with ICE officers, but there is no
13 evidence submitted to the Court. The Petitioner asserts he has not had any prior encounter with
14 ICE officers. Respondents cannot produce fingerprints taken at a border crossing, a prior
15 removal order or an Order of Supervision. His ethnicity and skin color may be the reason he was
16 unlawfully stopped, arrested and detained.

18 Across the United States, certain jurisdictions utilize Flock cameras, which can
19 capture the license plate of a car and take a photo. The Petitioner believes that is the method ICE
20 used to find that his last name is Latino, and they confirmed this by stopping him unlawfully.
21 Respondents’ only justification for Petitioner’s continued detention is that they believe he is in
22 the U.S. without a means of relief from removal, but they engaged in racial profiling and an
23 unlawful stop, arrest and detention, to justify stopping the Petitioner. Neither his taillights, nor
24 his front headlights were broken, and he had no driving infractions. The Court should ask, *how*
25

1 *did the ICE officers know to pull over the Petitioner* if he was driving in accordance with all the
2 rules of the road, did not have a broken lights on his car, and did not have any traffic violations?
3 Where would probable cause come from if he were obeying all the rules of the road?
4 Furthermore, the Petitioner was not given a reason for the stop, nor was he issued a speeding
5 ticket or moving violation because that was not the reason he was stopped, arrested and detained
6 unlawfully.

7
8 There was no probable cause to stop the Petitioner's car. ICE utilizes data from
9 Flock cameras that are tied to registration of vehicles for the Department of Motor Vehicles
10 (DMV) across the U.S. Respondents do not offer any reason or evidence of the Petitioner's
11 wrongdoing while operating his motor vehicle. How did they decide to stop the car driven by
12 Petitioner? There are no other details, nor is there any evidence proffering that this was a valid
13 and lawful arrest.

14 The Respondent was driving at 7:30-8:00 am on Saturday, November 8. There was no
15 traffic, and the Petitioner was driving the speed limit. When he was pulled over, the ICE officers
16 asked his name, for his Oregon driver's license and if he was in the United States lawfully. The
17 Petitioner did not know he had the right to remain silent, or the right to ask to speak to an
18 attorney when ICE arrested him.

19
20 The Petitioner works for Mo's Seafood and Chowder and has been with the company for
21 approximately ten years. He began as a dishwasher and is now a chef for the restaurant chain.
22 The President of Mo's, Jolee Bancroft, wrote a letter describing him as dependable and
23 trustworthy. See Exhibit 8. She has also been in touch with counsel to reiterate her support for a
24 long-standing employee with considerable ties to the community. In coastal areas, it is difficult
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26

1 to find dependable workers who will stay through the winter, when foot traffic slows down to a
2 trickle. The support of his employer and his large extended family living nearby, are reasons he
3 is not a flight risk.

4 The Petitioner has been an exemplary employee and leader at his place of
5 employment, so his supervisor knew something was wrong when he did not show up on time.
6 His employer was notified of the arrest by the Petitioner's family members that same day. Billie
7 Jo Edmonds, the Regional Manager for Mo's, also wrote a full-page letter stating that he is one
8 of the most dependable employees Mo's has ever had--calm under pressure, steady and deeply
9 committed to his work and to his team. See Exhibit 9.

11 The Assistant General Manager of the Ocean Lodge, Angel Pedraza Fraga, echoes
12 the description of the Petitioner's character, stating he has "been consistently impressed by his
13 strong work ethic, his kindness and his unwavering dedication to both his family and the
14 community around him". See Exhibit 10.

16 The pastor of Our Lady of Victory Catholic Church in Seaside wrote a full-page
17 letter extolling his reliability, his kindness, and how his actions have been a blessing to those
18 around him. Exhibit 11.

19 Several other community members have also written letters to let the court know
20 their observations of the Petitioner's character. See Exhibits 12-14.

22 There is no evidence that the Respondents have offered to show he was stopped
23 for any other reason other than his last name was recognizable as Latino in origin and he had
24 brown skin. There was no probable cause or evidence noted anywhere in the documents
25 submitted to this Court because this was not a lawful detention.

Respondents have not offered any probable cause or legal reason for the unlawful arrest. The Petitioner challenges the constitutional authority underlying his initial stop, arrest and detention. In *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018), the Supreme Court held that such threshold custody challenges are properly brought in habeas filings. In the absence of evidence that the stop, arrest and detention were lawful, his habeas petition should be granted.

(2) Petitioner is not eligible to be detained pursuant to 8 U.S.C. § 1225(b)

Respondents claim to be presently detaining Petitioner pursuant to §1225(b). Return at 2. However, evidence provided shows only allegations under INA § 212 (a)(6)(A)(i) (present without lawful admission or parole). *See* NTA, Docket 7, Exhibit C and Form I-213, Docket 7, Exh. B.

Across the United States and certainly at the Tacoma Immigration Court, Immigration Judges routinely deny bond hearings. Judge Tiffany Cartwright wrote in a 59-page ruling that in fiscal year 2023, that Tacoma immigration judges granted bond in only 3 percent of cases where bond was requested, a rate that was the lowest among immigration courts in the nation.² The Petitioner requests that the court to release him on his own recognizance, due to his long-standing ties to his community, his extended family and his long-term employment.

² Talbot, Peter. "Tacoma judge opens door for immigrants detained in US to be released on bond". The News Tribune, October 6, 2025. [Tacoma immigration court's denials of bond hearings unlawful | Tacoma News Tribune](#).

Migrants held at the facility — the only one of its kind in Washington — are less likely to be granted bond, more likely to pay higher bonds and spend longer times in detention than the national average, according to a new report from the University of Washington’s Center for Human Rights. The Center analyzed data on U.S. Immigration and Customs Enforcement actions from 2012 to 2023 and ICE detention placements from 2012 to 2024.³ This Court has the authority to release the Petitioner on his own recognizance based on the factors outlined by counsel and the letters of support filed with Petitioner’s Traverse.

C. The Court should grant the Writ because Respondents deprived Petitioner of notice and a meaningful opportunity to be heard.

It is well-established that the Due Process Clause of the Fifth Amendment to the U.S. Constitution applies to “all ‘persons’ within the United States,” irrespective of their immigration status. *J. G. G. v. Trump*, 145 S. Ct. 1003, 1005 (2025) (citing *Reno v. Flores*, 507 U.S. 292306 (1993)); *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). Due process requires notice and “the opportunity to be heard ‘at a meaningful time and in a meaningful manner.’” *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976) (internal citations omitted). Due process notice requirements apply to immigrants in removal proceedings. *See United States v. Rivera-Valdes*, 2025 WL 2672555, at *12 (9th Cir. 2025) (en banc).

Courts balance three factors to determine what process is due: (1) the private interest that will be affected by the official action; (2) the risk of an erroneous deprivation of such interest.

³ Deng, Grace. “Migrants held at Tacoma detention facility spend longer in detention, more likely to be deported.” *The Columbian*. Sept. 18, 2024. [Migrants held at Tacoma detention facility spend longer in detention, more likely to be deported - The Columbian](#)

through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards: and (3) the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail.

Mathews, 424 U.S. at 335. Here, all three factors strongly favor Petitioner.

1) Petitioner has a strong private interest in his freedom from detention.

The first factor strongly favors Petitioner. "Freedom from imprisonment . . . lies at the heart of the liberty that [the Due Process] Clause protects." *Zadvydas*, 533 U.S. at 690.

Thus, "[d]etention, including that of a non-citizen, violates due process if there are not 'adequate procedural protections' or 'special justification[s]' sufficient to outweigh one's 'constitutionally protected interest in avoiding physical restraint.'" *Perera v. Jennings*, 598 F. Supp. 3d 736, 742 (N.D. Cal. 2022) (second alteration in original) (quoting *Zadvydas*, 533 U.S. at 690).

2) Petitioner requests only the statutorily required procedural protections.

The second and third *Mathews* factors also heavily favor Petitioners because Petitioner requests only the procedural safeguards that are already enshrined in statute and regulations. For Petitioner, detention "without making an individual determination as to whether such [detention] is warranted carries a high risk of erroneous deprivation of liberty, and Respondents could hardly argue that compliance with existing laws would be overly burdensome." See *Jimenez*, 2025 WL 2430381 at *7. The procedural safeguards Petitioner seeks are (1) notice of Respondents' intended custody determination and (2) opportunity to be heard in the custody determination processes that Respondents are legally required to fulfill. See *id.* (finding *Mathews* factors favor Petitioner who "only asks for Respondents to follow the . . .

1 safeguards already in place.”). Petitioner’s circumstances did not support detention because he is
2 not a flight risk for reasons explained previously.

3 Respondents should have no interest in detaining Petitioner in violation of his
4 procedural rights. After a warrantless arrest, 8 U.S.C. § 1357(a)(2) requires that the individual
5 arrested “shall be taken without unnecessary delay” for further consideration of “their right to
6 enter or remain in the United States.” Indeed, Respondents have not asserted *any* lawful interest
7 in detaining Petitioner. *See generally* *Return; Addington v. Texas*, 441 U.S. 418, 426 (1979).
8

9 The failure to provide notice in such circumstances violates the Due Process
10 clause because it “deprive[d] [Petitioner] of any way to meaningfully contest the basis for [his]
11 detention.” *See Martinez v. McAleenan*, 385 F. Supp. 3d 349, 359-60 (S.D.N.Y. 2019).
12 Petitioner’s due process rights were violated by the lack of notice related to his custody
13 determination and the writ can be granted on this ground alone.⁴ *See M-L-G-G- v. Wamsley*, Case
14 No. 6:25-cv-02012-AA (D. Or., 2025).
15

16 **c. Respondents risk violating Petitioner’s Due Process rights by**
17 **continuing to detain him.**

18 Continued detention and transfer risk further violations of Petitioner’s due
19 process rights with regard to his immigration proceedings. The Petitioner has advised
20 counsel of the large number of male detainees on his floor who have been denied bond,
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22
23
24 ⁴ Any later attempts to provide notice would not cure the initial violation, since “the operative question in deciding
25 whether to issue the writ is whether the detention was lawful *at the time the petition was filed*.” *See Martinez v.*
26 *McAleenan*, 385 F. Supp. 3d 349, 365-66 (S.D.N.Y. 2019) (emphasis in original).

transferred out of Washington state and ultimately deported. The Tacoma Immigration Court has a 3% rate of granting bond, as referenced earlier. If every detainee had to hire an attorney to file a motion for bond at the Tacoma Immigration Court, only to have a 97% chance it will be denied, justice is not being served.

III. CONCLUSION

Because Respondents do not contest that Petitioner was unlawfully arrested, and make no showing they had probable cause to stop, arrest and detain the Petitioner, this Court should “dispose of the matter as law and justice require” by granting the writ. 28 U.S.C. § 2243.

Dated: December 23, 2025

/s/ Katherine Sinkins

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CERTIFICATE OF SERVICE

I hereby certify and declare under penalty of perjury that, on December 23, 2025, I served a copy of this

PETITIONER'S TRAVERSE IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS AND RESPONSE TO RETURN

and any attached pages:

☒ U.S. MAIL: by first class mail to the person at the address set forth below.

☐ INTER-FACILITY MAIL: to the person at the address set forth below.

☒ ECAS: Service by electronic filing in ECAS, in accordance with applicable regulations, to the person listed below. Both parties participate in the ECAS filing system.

☐ HAND DELIVERY.

PARTIES SERVED:

Ricardo Lopez-Reyes

NWIPC

1623 East J Street, Suite 5

Tacoma, WA 98421

Michelle R. Lambert,

Assistant United States Attorney

United States Attorney's Office

Western District of Washington

1201 Pacific Ave., Ste. 700

Tacoma, WA 98402

Michelle.lambert@usdog.gov

**EXHIBIT 8 –
LETTER FROM JOLEE BANCROFT**

Mo's

1125 SW 10th St., Newport, OR 97156
503-265-8786 | newportspacific@moerschowder.com

To Whom It May Concern:

My name is Jolee Bancroft, and I am writing on behalf of Mo's Seafood & Chowder, where I serve as the President. I am writing in support of Ricardo Lopez Reyes, who has been part of the Mo's family since 2015. Over the past ten years, Ricardo has become a steady, reliable, and essential member of our team.

Ricardo is a reserved, humble, and extremely hardworking individual. He never seeks attention, yet his work ethic speaks for itself. He shows up on time, gives his full effort every day, and takes pride in doing his job well. In a busy restaurant environment, that level of consistency and dedication is rare. Ricardo works behind the scenes, but his contributions are vital to keeping our kitchens running smoothly. He approaches every task with care and responsibility, and we know we can count on him to do things the right way. His quiet dependability has earned the respect of every manager and coworker he has worked with.

He is also a kind, respectful person who treats everyone with patience and humility. Ricardo is always willing to help others on the team and often supports new employees as they learn the job. His steady presence makes our workplace better.

Ricardo is a devoted husband and father, and his family relies on him deeply —emotionally, financially, and for day-to-day support. His absence has been incredibly hard on them, as he is truly the foundation of their home. Ricardo has never been a problem or a threat to anyone. He lives a quiet, responsible life centered around work and family and represents the values we hold dear at Mo's: honesty, hard work, and compassion.

I respectfully ask that you consider all of this as you review his case. Allowing Ricardo to remain with his family supports their well-being and reflects the values of fairness and stability that strengthen our community.

Please feel free to contact me if you need any additional information.

Sincerely,
Jolee Bancroft

**EXHIBIT 9 –
LETTER FROM BILLIE JO EDMONDS**



422 SW 10th St. Newport, OR. 97365
541-265-3798 | billiejo@ilovemoschowder.com

To Whom It May Concern,

My name is Billie Jo Edmonds, and I serve as the Regional Manager for Mo's Seafood & Chowder. I am writing on behalf of Ricardo Lopez-Reyes, who has been an employee of Mo's and a valued member of our community for nearly a decade.

Ricardo began working with us in 2015. He started as a dishwasher and, through consistent dedication, humility, and work ethic, grew into a lead position in our kitchen. This progression reflects the kind of person Ricardo is: reliable, responsible, and continuously striving to improve himself and support those around him. He is one of the most dependable employees we've ever had; calm under pressure, steady, and deeply committed to his work and to his team.

Ricardo is a quiet and humble man, but his impact is anything but small. He is the type of teammate who steps in without being asked, who cares for others, and who brings a sense of stability and kindness into every room he enters. His colleagues respect him, and many consider him a mentor and a friend. His absence has already been profoundly felt within our organization.

Outside of work, Ricardo is a devoted husband and father. He and his wife, Sandra Mota, share two children: C [REDACTED] (14) and J [REDACTED] (9). Ricardo is a loving, present father and the primary provider for his family. His dedication to them is evident in everything he does, from working long hours to ensure they are cared for, to being actively involved in their lives and education. His removal has caused significant hardship for his family, who depend on him emotionally and financially.

Ricardo is also an engaged member of our coastal community. He has built relationships here over many years; he is known, respected, and cared for by many. Our community is stronger because of people like Ricardo, people who work hard, contribute quietly but consistently, and treat others with dignity and respect.

I respectfully ask that you take into account Ricardo's long-standing ties to our community, his exemplary character, his commitment to his family, and the deep and immediate impact his absence is having on those who rely on him. He is not only a valued employee, he is a valued human being whose presence matters greatly.

Sincerely,

Billie Jo Edmonds

www.ilovemoschowder.com

**EXHIBIT 10 –
LETTER FROM ANGEL PEDRAZA FRAGA**

...The Ocean Lodge...

To Whom It May Concern,

I am writing to wholeheartedly recommend Ricardo Lopez Reyes, a devoted father, hardworking provider, and valued member of our community. I have had the privilege of getting to know Ricardo over the past twenty years, and I have been consistently impressed by his strong work ethic, his kindness, and his unwavering dedication to both his family and the community around him.

As an immigrant parent, Ricardo has faced challenges with perseverance, humility, and determination. He works tirelessly to provide stability and opportunity for his children, often putting in long hours without ever sacrificing the time or love he gives his family. His commitment to building a better life—through hard work, integrity, and responsibility—is evident in everything he does.

Beyond his role at home, Ricardo is an active and positive force in our community. He regularly volunteers at local events, including soccer tournaments, youth sports activities, and community fundraisers. I want to specifically talk about my gratitude to him for helping raise money for my son's cancer treatment. He gives his time generously and without expectation, always showing up ready to lend a hand where it's needed most.

Ricardo is well respected by parents, coaches, teachers, and neighbors alike. His reliability, warm spirit, and willingness to step forward make him someone people can count on. He contributes not only through physical effort but also by fostering a sense of unity, cooperation, and positive community involvement.

In every way, Ricardo embodies the values of hard work, service, and dedication. I have no hesitation in recommending him for any opportunity, support, or consideration he may be seeking. Our community is stronger because of people like him.

Please feel free to contact me if you have any questions or would like further information.

Sincerely,



Angel Pedraza Fraga

Assistant General Manager, The Ocean Lodge

995 Queen Street, Seaside, Oregon 97110

(971) 267 9869

**EXHIBIT 11 –
LETTER FROM FATHER JOSEPH BARITA**

Our Lady of Victory Catholic Church
P.O. Box 29
120 Oceanway
Seaside, OR 97138

St. Peter the Fisherman Chapel
Arch Cape, OR

November 12, 2025

To whom it may concern,

Ricardo Lopez Reytez has been an active Parishioner with her family at Our Lady of Victory Catholic Church for over 20 years. He has attended Mass on a regular basis, is a member of our Hispanic Ministry and volunteers whenever the opportunity presents itself. We value his dedication, his devotion to raising his children in the Catholic Church and his Faith.

Outside of the Parish, Ricardo and his family volunteer and provide assistance to several community outreach programs, including Central NW and Cancer Patient Fundraisers. Ricardo's D.O.B. is [REDACTED] and he resides at [REDACTED] in Seaside, Oregon. His wife is Sandra Mota-Lopez and they have two children, J [REDACTED] and C [REDACTED]. Both children are students at the Seaside School District and appreciate their opportunity to attend a school with great academic and athletic opportunities in a safe and nurturing environment. J [REDACTED] attends our 1st Communion Classes and C [REDACTED] attends our Confirmation Class. J [REDACTED] and C [REDACTED] have been baptized at our Church, and their parents encourage their spiritual development and commitments here.

Please grant Ricardo any assistance needed. Ricardo and his family are good people and contribute in several ways to our Parish and community. If you have any questions, please feel free to contact our office at (503) 738-6161.

Sincerely in Christ,

Rev. F. Barita

Father Joseph Barita

**EXHIBIT 12 –
LETTER FROM JOSE LUIS PONCE MONROY**

November 13, 2026

To whom may concern,

My Name is Jose Luis Ponce Monroy, an American citizen since 2023. Ricardo Lopez Reyes has been a good friend of mine for over 25 years. I hope this letter can help Ricardo's case. Ricardo is one of the few people I can trust and rely on, never failing to help out, even when he was going through his own problems. Ricardo and his wife Sandra have two children, they always made it clear that education was always first. He wants his children to have what he was never able to do, having a proper education without any held backs. Ricardo and his wife have been financially supporting their parents in Mexico since they first arrived here. I know it took them a long time to have a balance to feel comfortable here while taking care of their parents in Mexico but with their determination they made it work. Ricardo is the reason why his parents aren't in poverty anymore. Mexico doesn't have the same resources that America has to offer. From as long as I've known Ricardo he works full time in two different jobs and he still makes time for his family and for his community. Ricardo and Sandra's determination is something I've never seen before. What has happened to Ricardo is devastating and I can't imagine what his family is going through. Ricardo is no harm to the community, he just wants to help his family and his parents in Mexico. Sending him back would only make things worse due to the fact that he is the financial support of his family in America and Mexico. A one income family is not enough anymore during these times. I hope this letter helps you see that Ricardo is needed here and sending back would put his family in a difficult position.

Sincerely,

Jose Luis Ponce Monroy



Jose Luis Ponce

**EXHIBIT 13 –
LETTER FROM JUANA MOLINA DE PONCE**

November 13, 2026

To whom may concern,

My name is Juana Molina de Ponce, an American citizen since 2008. I have known Ricardo Lopez Reyes for over 25 years. I am writing this letter hoping it helps with Ricardo's case. I have seen Ricardo and Sandra, his wife grow over the years and they made a beautiful family here. He has always helped out with the community and his Sandra always supports him doing so. Ricardo has two children with Sandra and made sure they never had anything missing, always making sure their education was first and never missing a day of school. Makes sense since he never had the same opportunities in Mexico, giving your child what they deserve. I know Ricardo works full time and has two jobs to be able to provide financially for his family here and in Mexico. We all know that nowadays it's almost impossible to rely on one income. Ricardo and his wife are the sole support for their children and their parents in Mexico. Making the impossible possible. I know that taking the risk of leaving your hometown and hoping to have something better in America is not promised but Ricardo made it work with the little opportunities he had. Ricardo and with the help of his wife was determined to make it out of poverty for themselves and for their parents. If Sandra stays and Ricardo is sent back to Mexico, they'll all extremely struggle. Like I said, it's difficult to rely on one income and now Sandra would have to support her family here and in Mexico. Sending Ricardo back to Mexico would lose everything he has ever built with his wife. I don't wish that on anyone. I hope this letter helps you to understand and hope Ricardo is released so he can be with his family and that he is no harm to the community. His children need their father.

Sincerely,

Juana Molina de Ponce



Juana Molina

**EXHIBIT 14 –
LETTER FROM JULIO MANUEL CAMPUZANO**