Nicolette Glazer Esq. (CSBN 209713)
nicolette@glazerandglazer.com
LAW OFFICES OF LARRY R GLAZER
2121 Avenue of the Stars East #800
Century City, California 90067
T:310-407-5353
F:310-407-5354

ATTORNEY FOR PETITIONER

UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

EMILIO GAEL PEREZ BUENO Plaintiff and Petitioner, vs. JAMES JANECKA, Warden of the Adelanto Detention Center; et al. Defendants-Respondents	Case No.: 5:25-cv-03376-CAS-BFM Hon: Judge Brianna Fuller Mircheff **TRAVERSE/REPLY IN SUPPORT OF PETITION FOR A WRIT OF HABEAS CORPUS CHALLENGING UNLAWFUL IMMIGRATION DETENTION**

The right to file a petition for a writ of habeas corpus is intended to, at a minimum, provide "a means of reviewing the legality of Executive detention." *Rasul v. Bush*, 542 U.S. 466, 474 (2004) (quoting *INS v. St. Cyr*, 533 U.S. 289, 301 (2001)).

FACTS AND PROCEDURAL HISTORY

Respondents have not disputed any of the facts asserted in Petitioner's declaration, Exhibit A to ECF # 1, nor in the Verified Petition for Habeas Corpus, ECF # 1¶¶23-36. Instead, Respondents have provided a copy of the ISAP printout without any explanation and/or the actual disposition of any of the alleged missed virtual appointments and biometrics check ins. (ECF # 6-2 & 6-3). Nor do they dispute that they provided neither a notice nor an opportunity for Petitioner to rebut and explain prior to being deprived of his liberty. Petitioner strenuously disputes that he has ever knowingly and willfully violated the terms of his order of recognizance. He also maintains that he was not allowed to explain and show that no violations had in fact occurred and that any technical failure was remedied promptly. *See* Attached Declarations from Petitioner and his parents.

TRAVERSE ARGUMENT

First, Respondents' return confirms Petitioner's entitlement to relief as a class member under the declaratory judgment in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025). (ECF # 6 at 6-7). Yet as of today Respondents have not afforded Petitioner a bond hearing before the immigration judge although more than 7 days have passed since the Petition was filed. The Court should, thus, grant Mr. Bueno's request for a writ of habeas corpus ordering that Respondents release him unless within seven days of this Court's order they schedule him for a bond hearing under 8 U.S.C. § 1226(a). The Court should also order that the Immigration Judge may not conclude that Mr. Bueno is subject to detention under 8 U.S.C. §§ 1226(c) or 1225(b)(2) nor could the Immigration Judge conclude that they are not bound by

the vacatur and declaratory judgment granted to class members in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ---, 2025 WL 3288403 (C.D. Cal. Nov. 25, 2025). Given that Respondents have not contested Mr. Bueno's class membership and that the *Maldonado Bautista v. Santacruz* declaratory judgment recognizes class members' entitlement to relief, and that the liberty interest at stake is significant, Petitioner respectfully requests that the Court consider his petition forthwith instead of waiting for a hearing and oral argument.

Second, Respondents have not addressed or meaningfully contested the claims asserted in Counts I and II of the Petition. Under § 1226(a), DHS can release noncitizens like Petitioners on bond, on their own recognizance (also known as "conditional parole"), or on humanitarian parole. *See* 8 U.S.C. § 1226(a)(2); 8 C.F.R. § 236.1(8). Here Petitioner was release on an order of recognizance which necessarily required the initial adjudicating officer to make a favorable decision that Petitioner did not pose a risk of flight or danger to the community. *See* 8 C.F.R. §§ 236.1(c)(8), 1236.1(c)(8) (noncitizen must "demonstrate to the satisfaction of the officer that such release would not pose a danger to property or persons, and that the [noncitizen] is likely to appear for any future proceeding"); *see also* 8 C.F.R. § 212.5 (humanitarian parole available only when "the [noncitizens] present neither a security risk nor a risk of absconding"). *Saravia v. Sessions*, 280 F. Supp. 3d 1168, 1176 (N.D. Cal. 2017), aff'd sub nom. *Saravia for A.H. v. Sessions*, 905 F.3d 1137 (9th Cir. 2018) (Any "[r]elease" of a noncitizen, thus, "reflects a determination by Respondents that the noncitizen is not

a danger to the community or a flight risk."). When a non-citizen is placed on an order of supervision under an OREC after having been detained, a protected liberty interest arises. *Young v. Harper*, 520 U.S. 143, 147-149 (1997). The Due Process Clause may protect this liberty interest even where a statute allows the immigrant's arrest and detention and does not provide for procedural protections. *Id.* (Due Process requires pre deprivation hearing before revocation of parole); *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972). *Morrissey* observed that parole allows the parolee to enjoy the same activities as those who have not been arrested and held in custody including, living at home, having a job, and "be[ing] with family and friends and to form the other enduring attachments of normal life." *Morrissey*, 408 U.S. at 482. "Though the [government] properly subjects [the parolee] to many restrictions not applicable to other citizens," such as monitoring and seeking authorization to work and travel, "his condition is very different from that of confinement in a prison." *Id.* "The parolee has relied on at least an implicit promise that parole will be revoked only if he fails to live up to the parole conditions." *Id.* The revocation of parole undoubtedly "inflicts a grievous loss on the parolee." *Id.* (quotations omitted). Therefore, a parolee possesses a protected liberty interest in his "continued liberty." *Id.* at 481–84. The protected liberty is even greater when a person is placed on release on order of recognizance.

In *Pinchi*, the Court explained:

> . . . even when ICE has the initial discretion to detain or release a noncitizen pending removal proceedings, after that individual is released from custody she has a protected liberty interest in remaining out of custody. See Romero v. Kaiser, No. 22-cv-02508, 2022 WL 1443250, at *2 (N.D. Cal. May 6, 2022)

> ("[T]his Court joins other courts of this district facing facts similar to the present case and finds Petitioner raised serious questions going to the merits of his claim that due process requires a hearing before an IJ prior to re-detention."); Jorge M. F. v. Wilkinson, No. 21-cv-01434, 2021 WL 783561, at *2 (N.D. Cal. Mar. 1, 2021); Ortiz Vargas v. Jennings, No. 20-cv-5785, 2020 WL 5074312, at *3 (N.D. Cal. Aug. 23, 2020); Ortega, 415 F. Supp. 3d at 969 ("Just as people on preparole, parole, and probation status have a liberty interest, so too does [a noncitizen released from immigration detention] have a liberty interest in remaining out of custody on bond.").

Pinchi v. Noem, No. 5:25-CV-05632-PCP, 2025 WL 2084921, at *3 (N.D. Cal. July 24, 2025).

Under substantive due process doctrine, a restraint on liberty like revocation of a non-citizen's order of supervision, recognizance and/or parole is only permissible if it serves a "legitimate nonpunitive objective." *Kansas v. Hendricks*, 521 U.S. 346, 363 (1997). The Supreme Court has only recognized two legitimate objectives of immigration detention: *preventing danger to the community or preventing flight prior to removal. See Zadvydas v. Davis, 533 U.S. 678, 690-92 (discussing constitutional limitations on civil detention).* Here Respondents have not presented any evidence that a DHS officer with proper authority made a decision *prior to re-detaining* Petitioner that he is a danger to the community or a flight risk or that he actually followed Respondents' own regulation in revoking Petitioner's OREC. *See* 8 U.S.C. § 1226(b); 8 C.F.R. § 236.1(c)(9). In fact, the I-213 shows that Respondents arrested Petitioner at this regularly scheduled in-person ISAP appointment without any process. See also Exhibit R-1 attached to this Traverse.

"Procedural due process imposes constraints on governmental decisions which deprive individuals of liberty," like the decision to revoke a non-citizen's

order of supervision. *Mathews v. Eldridge*, 424 U.S. 319, 332 (1976) (citation modified). "The fundamental requirement of [procedural] due process is the opportunity to be heard at a meaningful time and in a meaningful manner." *Id.* at 333 (citation modified). Despite "the breadth of [the] statutory language" in 8 U.S.C. § 1226(b), the Respondents' authority to re-detain is subject to "an important implicit limitation": It cannot lawfully re-arrest or re-detain someone without "a material change in circumstances." *Saravia*, 280 F. Supp. 3d at 1197; *see also Matter of Sugay*, 17 I. & N. Dec. 637, 640 (B.I.A. 1981). Thus, a person released from initial custody, like Petitioner here, cannot be re-detained "solely on the ground that he is subject to removal proceedings[,]" without some new, intervening cause. *Saravia*, 280 F. Supp. at 1196; *United States v. Holmes*, 452 F.2d 249, 261 (7th Cir. 1971) (Stevens, J.) (prohibiting rearrest without change in circumstances in criminal context); *U.S. v. Brignoni-Ponce*, 422 U.S. 873, 884 (1975) (applying Fourth Amendment principles from criminal context to "limit" scope of immigration agents' seizure authority); *Gonzalez v. United States Immigr. & Customs Enf't*, 975 F.3d 788, 817 (9th Cir. 2020) (Fourth Amendment limits apply equally to seizures in criminal and civil immigration context).

Third, the Supreme Court has repeatedly recognized that re-detention after some form of conditional release requires a pre-deprivation hearing. *Young v. Harper*, 520 U.S. 143, 152 (1997) (re-detention after pre-parole conditional supervision); *Gagnon v. Scarpelli*, 411 U.S. 778, 782 (1973) (same, in probation context); *Morrissey v. Brewer*, 408 U.S. 471 (1972) (same, in parole context). The same protection apply to people like Petitioner who were released from civil

immigration detention. *See Ortega v. Bonnar*, 415 F. Supp. 3d 963, 970 (N.D. Cal. 2019) (observing that "[g]iven the civil context [of immigration detention], [the] liberty interest [of noncitizens released from custody] is arguably greater than the interest of parolees."). Many of the Courts to have addressed the issue found that a noncitizen like Petitioner, who released on OREC and/or parole, has a due process right to challenge their re-detention without a pre-deprivation hearing before a neutral adjudicator. *See, e.g., Rodriguez v. Marin*, 909 F.3d 252, 256 (9th Cir. 2018) (noting in case involving § 1225(b) and related statutes that "[a]rbitrary civil detention is not a feature of our American government," and expressing "grave doubts that any statute that allows for arbitrary prolonged detention without any process is constitutional"); *He v Janecka*, 5:25-cv-03375-WLH-MAA, Dkt No 7 (C.D. Cal, Jan. 8, 2026) (enjoining Respondents "from detaining Petitioners unless they are provided with a pre detention hearing before a neutral decisionmaker where Respondents bear the burden of demonstrating by clear and convincing evidence that Petitioners are a flight risk or a danger such that their physical custody is required); *Ramirez Tesara v. Wamsley*, No. 2:25-CV-01723-MJP-TLF, 2025 WL 2637663 (W.D. Wash. Sept. 12, 2025); *Francois v. Wamsely*, No. C25-2122-RSM-GJL, 2025 WL 3063251 (W.D. Wash. Nov. 3, 2025).

The Court should order that Petitioner has a due process right to challenge his re-detention pending his removal proceedings before a neutral adjudicator. Due process "is a flexible concept that varies with the particular situation." Zinermon v. Burch, 494 U.S. 113, 127 (1990). The procedural protections required in a given situation are evaluated using the *Mathews v. Eldridge* factors:

> First, the private interest that will be affected by the official action; second, the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards; and finally, the government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail.

Id. (quoting *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976)); *see Hernandez v. Sessions*, 872 F.3d 976, 993 (9th Cir. 2017) (applying Mathews factors in immigration detention context).

As to the first factor, Petitioner has a significant private interest in remaining free from detention. "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." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Here Petitioner had been out of custody for a year and a half while seeking relief in his removal proceedings and on appeal. His current detention denies him that freedom. For the second factor, "the risk of an erroneous deprivation [of liberty] is high" when, as here, "[the petitioner] has not received any bond or custody redetermination hearing." *A.E. v. Andrews*, No. 1:25-cv-00107-KES-SKO, 2025 WL 1424382, at *5 (E.D. Cal. May 16, 2025). Civil immigration detention, which is "nonpunitive in purpose and effect[,]" must be justified. While Respondents allege that Petitioner violated the terms of his release, courts have found in similar cases that it does not "necessarily follow that Petitioner can be detained for those violations without a hearing." *T.B. v. Wamsley*, No. C25-1192-KKE, 2025 WL 2402130, at *4 (W.D. Wash. Aug. 19, 2025). "That the Government may believe it

has a valid reason to detain petitioner does not eliminate its obligation to effectuate the detention in a manner that comports with due process." Id. Here, as there were no procedural safeguards to determine if petitioner's re-detention was justified, "the probable value of additional procedural safeguards, i.e., a bond hearing, is high." *A.E.*, 2025 WL 1424382, at *5.4; *accord Jose B.M., Petitioner, v. Ro Murray, Warden of the Mesa Verde Det. Center; et al.*, No. 1:25-CV-01584-KES-CDB (HC), 2026 WL 19121 (E.D. Cal. Jan. 4, 2026)

As to the third factor, although the government has a strong interest in enforcing the immigration laws, the government's interest in detaining petitioner without a hearing is "low." *Ortega v. Bonnar*, 415 F. Supp. 3d 963, 970 (N.D. Cal. 2019); see also *Morrissey*, 408 U.S. at 483 (noting that "the State has an overwhelming interest in being able to return the individual to imprisonment without the burden of a new adversary criminal trial[,] . . . [y]et, the State has no interest in revoking parole without some informal procedural guarantees."). In immigration court, custody hearings are routine and impose a minimal cost to Respondents. In sum, the *Mathews* factors show that Petitioner is entitled to a bond hearing. At such a hearing, the government must prove that Petitioner is a flight risk or danger to the community by clear and convincing evidence. *See Pablo Sequen v. Albarran*, No. 25-CV-06487-PCP, 2025 WL 2935630, at *13–14 (N.D. Cal. Oct. 15, 2025); *Duong v. Kaiser*, No. 25-CV-07598-JST, 2025WL 2689266, at *8 (N.D. Cal. Sept. 19, 2025); Addington v. Texas, 441 U.S. 418, 425– 33 (1979) (holding that clear and convincing evidence standard was appropriate standard of proof for civil commitment proceedings for the mentally

ill). And that hearing should have occurred before petitioner was re-detained. "'[T]he root requirement' of the Due Process Clause" is "'that an individual be given an opportunity for a hearing before he is deprived of any significant protected interest.'" *Cleveland Bd. of Educ. v. Loudermill*, 470 U.S. 532, 542 (1985) (quoting *Boddie v. Connecticut*, 401 U.S. 371, 379 (1971)); *Zinermon*, 494 U.S. at 127 ("Applying [the Mathews] test, the Court usually has held that the Constitution requires some kind of a hearing before the State deprives a person of liberty . . . ."); *United States v. James Daniel Good Real Prop.*, 510 U.S. 43, 53, 59–61 (1993) ("We tolerate some exceptions to the general rule requiring predeprivation notice and hearing, but only in extraordinary situations where some valid governmental interest is at stake that justifies postponing the hearing until after the event[,]" such as "executive urgency." (internal quotations omitted)).

Here Respondents allege that Petitioner violated the terms of his release by failing to complete certain virtual check-ins on the remote ISAP application and by singe in person visit. ECF # 6-2. The printout shows that Petitioner's last such violation was on 2 October 2025 and after the alleged violation Petitioner appeared and was found at the ISAP office as he was reporting in person a month and a half later. (ECF # 6-3). Obviously, the re-detention was not either urgent nor a priority for Respondents; nor have Respondents made a showing that they were faced with exigent circumstances warranting his immediate arrest as a flight risk, without any pre-deprivation process on 14 November 2025.

Respectfully Submitted by

s/ Nicolette Glazer Esq.

Nicolette Glazer Esq.
LAW OFFICES OF LARRY R GLAZER
2121 Avenue of the Stars #800
Century City, CA 90067
T: 310-407-5353
F: 310-407-5354
nicolette@glazerandglazer.com
ATTORNEY FOR PETITIONER

I Emilio Gael Perez Bueno, I am over 18 years old and I declare under penalty of perjury that the following is true and correct to the best of my knowledge

Less than a month after my arrival in the United States, I was integrated into a monitoring and supervision program known as ISAP in March 2024. Initially, this program was located at 1000 Windy Pass SPC 2, Barstow, California 92311, and later at 2014 Cameron CT, Barstow, California 92311.

The monitoring method assigned to me consists of using a mobile application called BI SMART, in which the program staff created an account in my name using my personal email, installed on my own cell phone. Within this application, there are several functions, including a direct messaging channel with the assigned agent, a calendar that reflects my both in-person and virtual appointments (video calls), as well as a section to send photographs of my face, among other features.

Appointments with my agent were scheduled approximately every month and a half, alternating between in-person and virtual meetings. This schedule was maintained for most of the time I have been in the program. However, just a couple of months ago, due to a change in administration, virtual visits were eliminated from the monitoring plan. According to the testimony of my most recent agent, these virtual visits had originally been implemented as a measure due to the COVID-19 pandemic.

During the supervision appointments, I am asked questions regarding my place of residence—which has been fixed since July 2024—as well as whether I have had any medical issues, problems with the police, or incidents at home, to which I have always responded no, as I have never had any such issues.

Additionally, every Thursday I must wait for the weekly notification sent through the BI SMART application, usually between 10:00 a.m. and 12:00 p.m., to submit a photograph of my face. This photograph must be sent with the location function activated on my mobile device. This process has been a constant part of my obligations within the program.

During the time I have been enrolled in the program, there have been various administrative changes, including updates to the mobile application and changes in my assigned agent approximately three or four times.

It is important to point out that the application has presented multiple technical failures, as on several occasions it does not send the weekly notification within the established schedule or, in some cases, it does not arrive at all. On multiple occasions, my agent has called to inform me about general application failures, which have also affected other people in the program. In those calls, my agent instructed me to send the photograph of my face at the time of the call, even if this occurred outside the usual schedule.

Likewise, on some occasions, I have called directly to request instructions when the notification did not arrive, obtaining the same result: I was asked to send the photograph at that moment, even if it was already outside the originally scheduled time.

Similarly, there was a recurring problem with the application, as in certain cases it did not recognize or record the device's location, even when the location function was turned on at all times. My agent informed me that this situation also frequently happened to other people and recommended that I uninstall the application and reinstall it to restore location permissions. In some cases, this action solved the problem, while in others it apparently did not, without my knowledge that the issue persisted.

Currently, I can see that all these technical and administrative issues have been reflected in my record within the program.

Every time I went to report to them during the years, no one in the ICE or ISAP ever mentioned I missed any of the appointment either by the App or in person. Every time I went to report to the ICE or the ISAP, my parent always went with me.

I, Emilio Gael Pérez Bueno, in full use of my mental faculties and consciously, declare that I have never had the intention to fail the monitoring program or to disobey any of its rules. At all times, I have been concerned about and care deeply for my immigration status, as well as my personal well-being and that of my family.

For this reason, I respectfully request that I may be granted a forgiveness, in order to be able to reunite with my family again and continue with my case in freedom. I state clearly and honestly that I have always complied with my weekly photo reports and with all obligations of my monitoring and supervision program, whether requested through the BI SMART application or by direct calls from my assigned agent.

Emilio Gael Pérez Bueno

My name is Fatima Elizabeth Bueno Gonzalez, and I swear under penalty of perjury that the following is true and correct.

I Fatima Bueno Gonzalez declare that since March 2024 to my arrival in the United States, we entered into a program of vigilance and monitoring, which includes in person appointments, video calls, and weekly facial recognition photo reports.

I fully know that my son, Emilio Gael Pérez Bueno, has always attended his in-person appointments at the offices of ISAP in San Bernardino, since I was the one who accompanied him to each one. On some occasions we even went inside the office with him, including to allow him to use the bathroom, and on other occasions we would wait for him in the parking lot. The only exception was the last time, which was the day of his detention, since on that day he was only accompanied by his father.

Ever since this monitoring and vigilance began, my son has always kept me informed as to what they directed him to do during the in-person appointments, as well as on the phone calls he received from his agents. During this process, they changed my son's agents around 3 or 4 times, something that I was always aware of.

In addition, ever since the beginning of this whole process, I have been aware of the constant problems with the BI SMART application, installed on my son's cell phone. On different occasions, my son has been aware of said problems, as well as the calls that his agent would make in the moment, instructing him to uninstall and install the application once again, due to the technical problems that it was having.

I also declare that my son, Emilio Gael Perez Bueno, was never informed at any moment, by his agent, of any fault or violation of any rule, not even while he attended his in-person appointments. At no time did they communicate with him the supposed said violations that now appear reflected from June 2024 until the date of his detention.

Our immigration status is very important to us, and for the well-being of our family, we have always followed the process exactly how they indicated to us, always being conscious to not miss any established rule or requirement.

I declare that the previous is true according to the best of my knowledge and understanding.

Illegible signature
01-02-2026

CERTIFICATE OF TRANSLATION

I, Michael Pozo, am competent to translate from Spanish to English and certify that the translation of this **STATEMENT** is true and accurate to the best of my knowledge and abilities.

Translator's Signature
617 S. Olive Ste. 710
Los Angeles, CA 90014

Date: 1/2/26

Mi nombre es Fatima Elizabeth Bueno Gonzalez y juro bajo penalidad de perjurio que todo lo siguiente es verdad y correcto.

Yo, Fátima Elizabeth Bueno González, declaro que desde marzo del 2024, a mi llegada a los Estados Unidos, entramos a un programa de vigilancia y monitoreo, el cual incluía citas presenciales, videollamadas y reporte de fotografía de rostro de manera semanal.

Me consta plenamente que mi hijo, Emilio Gael Pérez Bueno, siempre acudió a sus citas presenciales en las oficinas de ISAP en San Bernardino, ya que yo lo acompañé a cada una de ellas. En algunas ocasiones pasamos con él hasta dentro de la oficina, incluso para permitirle pasar al baño, y en otras ocasiones lo esperamos en el estacionamiento. La única excepción fue la última ocasión, que fue el día de su detención, ya que ese día fue acompañado únicamente por su papá.

Desde el comienzo de esta vigilancia y monitoreo en el que estamos, mi hijo siempre me ha hecho saber en todo momento qué es lo que le indicaban durante las citas presenciales, así como en las llamadas que recibía de sus agentes. Durante este proceso, a mi hijo le cambiaron de agente en aproximadamente 3 o 4 ocasiones, situación de la cual siempre tuve conocimiento.

Asimismo, desde el principio de todo este proceso, he tenido conocimiento de los problemas constantes de la aplicación Bi SMART, instalada en el celular de mi hijo. En diferentes ocasiones, mi hijo se encontraba atento a dichas fallas, así como a las llamadas que su agente le hacía de momento, indicándole desinstalar e instalar nuevamente la aplicación, debido a los problemas técnicos que se presentaban.

Declaro también que a mi hijo, Emilio Gael Pérez Bueno, no se le informó en ningún momento, por parte de su agente, de ninguna falta ni de alguna violación a alguna regla, ni siquiera cuando acudía a citas presenciales. En ningún momento se le comunicaron dichas supuestas violaciones que ahora aparecen reflejadas desde junio del 2024 hasta la fecha de su detención.

Para nosotros es muy importante nuestro estatus migratorio y, por el bienestar de nuestra familia, siempre hemos procurado seguir el proceso tal y como se nos indica, estando pendientes en todo momento de no faltar a ninguna regla ni requisito establecido.

Declaro que todo lo anterior es verdadero según mi leal saber y entender.

01-07-2026

I, Maria Macias, prepared the contents of the above declaration at the request and with the permission of Emilio Gael Perez Bueno. I am competent in interpreting from English to Spanish. I read the information contained herein to the Petitionert in Spanish to the best of my ability. The Petitioner confirmed to me that all the translated information from Spanish to English and vice versa in this document is true and correct and adopted the contents of the declaration as her own. Emilio Gael Perez Bueno unequivocally authorized me to affix her name as an indication of approval and adoption as she is detained and cannot receive and send documents easily.

I declare under penalty of perjury on Spanish.