

RAMIREZ-SMITH LAW  
NIKKI R. SMITH, ISB: 9030  
NSMITH@NRSDT.COM  
NEAL F. DOUGHERTY, CSB: 302612  
NDOUGHERTY@NRSDT.COM  
TALIA D. BURNETT, CSB: 286318  
TBURNETT@NRSDT.COM  
JACOB ROURK, ISB: 12585  
JROURK@NRSDT.COM  
444 W. Iowa Ave.  
Nampa, ID 83686  
208-461-1883

*Attorneys for Petitioner*

UNITED STATES DISTRICT COURT  
FEDERAL DISTRICT COURT OF IDAHO

VENCES BELTRAN, Daniel,

Petitioner,

v.

Brian Henkey, Field Office Director of Enforcement and Removal Operations, Salt Lake City Field Office, Immigration and Customs Enforcement; Kenneth PORTER, Acting Director of the Boise U.S. Immigration and Customs Enforcement Field Sub-Office; Kristi NOEM, Secretary, U.S. Department of Homeland Security; U.S. DEPARTMENT OF HOMELAND SECURITY; Pamela BONDI, U.S. Attorney General; Executive Office of Immigration Review,

Respondents.

Case No. 1:25-cv-00733-DCN

**MOTION FOR TEMPORARY  
RESTRAINING ORDER**

Petitioner moves this Court for a Temporary Restraining Order barring respondents from removing the Petitioner from the District of Idaho; prohibiting Respondents from communicating with Petitioner concerning his rights, responsibilities, or possible outcomes of any proceeding regarding his removal from the United States or these proceedings, absent the presence of counsel; and, ordering his immediate release from custody.

DATED this 31<sup>st</sup> day of December 2025.

/s/ Jacob C. Rourk  
Jacob C. Rourk  
Attorney for Petitioner