

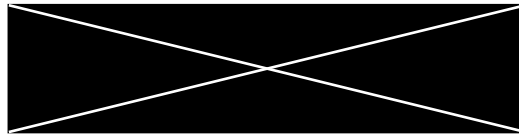
**SUPPORTING DOCUMENTS FOR
THE PETITION FOR WRIT OF
HABEAS**

CORPUS PURSUANT TO 28 U.S.C.

§ 2241

YANET LARA ACOSTA

NON CITIZEN NUMBER:



IN IMMIGRATION DETENTION

Name: Yanet
Last Name: Lara Acosta
Alien Number: [REDACTED]
Address: [REDACTED]

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
City and State: San Antonio, Texas

In the Matter of _____)
)
Name: Yanet)
Last Name: Lara Acosta)

Alien Number: [REDACTED]

In Removal Proceedings

Honorable Immigration Judge: Meredith B. Tyrakoski

DHS Office of the Principal Legal Advisor: San Antonio, Texas

MOTION FOR BOND AND CUSTODY REDETERMINATION

Name: Yanet

Last Name: Lara Acosta

Alien Number: [REDACTED]

Address: [REDACTED]

MOTION FOR BOND AND CUSTODY REDETERMINATION

Respondent, hereinafter Yanet Lara Acosta by and through her counsel, respectfully moves this Immigration Court to release her on conditional parole pursuant to the Court's authority under INA § 236(a)(2)(B) or, in the alternative, set a reasonable bond in this matter.

In support thereof, the Respondent, through her undersigned counsel, states the following:

BACKGROUND

1. The Respondent is a native and citizen of Cuba. Respondent entered the United States in or around 2022. Respondent fled Cuba to escape [REDACTED]

2. Respondent did not come into the custody of Immigration and Customs Enforcement ("ICE") following a criminal arrest, but rather was placed into removal proceedings after she was apprehended by ICE officers after a routinely appointment.

3. Respondent is currently detained at Karnes County Immigration Processing Center located at 409 FM 1144, Karnes City, Texas 78118.

4. Prior to her detention, Respondent was regularly employed at Prudential Clean-room Services, located at 3985 N Macy's St, Round Rock, Texas 78665 as Accounting Assistant in the Accounting Department.,

Respondent has never been arrested for any crime.

5. If released, Respondent will reunite with her husband, at their home located at [REDACTED] Respondent's husband is pursuing his family-based visa I-130 that was approved but Respondent left the country before her visa interview due to [REDACTED]

[REDACTED] Respondent's husband is now pursuing for the second time another family-based petition with form I-130 and respondent is waiting for the process and the approval while in The United States of America.

Respondent was approved for a visa the first time by the US Department of State in 2022, but due to adverse circumstances in the political environment in Cuba respondent had to abandon the country before an interview for her approved visa was schedule.(please see the Receipt for the 2022 approved visa attached to this Motion.

Respondent's husband Yordany Diaz Cabrera sent another Petition for Alien Relative this year 2025 and until today the application is still pending.

Once Respondent is release she will have the support of her family members, friends and co-workers including US. citizens and others in lawful status, to help respondent continue to comply with all court requirements if released on parole or bond.

STATEMENT IN SUPPORT OF REQUEST FOR CONDITIONAL PAROLE OR BOND

A. Introduction and Statement of Law

This Court has the authority to order Respondent's released on conditional parole or to set a bond in this matter. As discussed below, Respondent warrants release on conditional parole or pursuant to a low bond because she is not a flight risk and she is not a danger to society.

1. This Court has the Authority to Release Yanet Lara Acosta on Conditional Parole, without the Payment of Bond Section § 236(a)(2) of the INA states that "the Attorney General...may release the alien on: (A) bond...or (B) conditional parole."

The Board of Immigration Appeals has clarified that release on conditional parole can be based solely on a determination that the person is not present a danger to society, is not a threat to national security and is not pose a flight risk; no showing of additional humanitarian reasons is required.

2. Alternatively, this Court has the Authority to Issue a Bond in this Matter

A. An Immigration Judge's authority to issue bond under INA § 236(a)(2) is well-established.

B. Respondent Warrants Release on Conditional Parole or on a Bond .

The record reflects that Mr. warrants release on conditional parole or a low bond because she is not a flight risk, he is not a danger to the community, and he is prima facie eligible for relief in the form of asylum and withholding of removal. (See Motion for Class Certification Lazaro Maldonado Bautista et al v. Ernesto Santacruz Jr et al) for Bond Eligible Class Nov 25,2025.

Bond Eligible Class: All noncitizens in the United States without lawful status who (1) have entered or will enter the United States without inspection; (2) were not or will not be apprehended upon arrival; and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the Department of Homeland Security makes an initial custody determination

Respondent is not a Flight Risk

Yanet Lara Acosta is not a flight risk. Respondent has no prior immigration record or history of nonappearance at immigration court proceedings. Since she arrived to the United States approximately three years ago respondent has maintained a fixed address. If released, she would reunite with her husband see Matter of Castillo-Padilla, 25 I & N Dec. 257, 259 (BIA 2010).

See Matter of Guerra, 24 I & N Dec. 37, 39-40 (BIA 2006); Matter of Adeniji, 22 I & N Dec. 1102, 1111-13 (BIA 1999). See INA § 236(a)(2) ("the Attorney General...(2) may release the alien on—(A) bond of at least \$1,500..."); see also Matter of Guerra, 24 I & N Dec. at 39 (BIA 2006).

See 8 C.F.R. § 1003.19(h); C.F.R. § 1003.19(d) ("The determination of the Immigration Judge as to custody status or bond may be based upon any information that is available to the Immigration Judge or that is presented to him or her by the alien or the Service.").

Respondent is not a danger to Society. respondent is not a danger to the community. And she doesn't have any criminal convictions, nor has she ever been arrested by the police in the United States nor in Cuba, [REDACTED]

her intend to promote dangerous conditions in a new country. Thus, it is clear that Respondent does not pose a danger to society.

Respondent is Eligible for Asylum and Withholding of Removal.

If released, respondent intends to pursue legal relief in the form of asylum, withholding of removal and protection under the Convention Against Torture as well as an Adjustment of Status. Respondent fears ongoing persecution in Cuba on account of



C. Conclusion

Conditional parole is warranted in this matter. Alternatively, Respondent should be released on a low bond. She is not pose a flight risk and will not fail to appear before the Court when required to do so. She presents no threat to the safety or security of the community. She has established a strong prima facie case for relief from removal.

WHEREFORE, Yanet Lara Acosta respectfully requests that the Court release her on conditional parole or at the lowest possible bond.

Respectfully Submitted,

Date

Signature: _____

Yordanys Diaz Cabrera
Respondent's Husband
On behalf of Respondent

Name: Yanet

Last Name: Lara Acosta

Alien Number: [REDACTED]

Address: [REDACTED]

ORDER OF THE IMMIGRATION JUDGE

Upon consideration of Respondent's **Motion For Bond and Custody Redetermination** , it is HEREBY ORDERED that the motion be ___Granted ___Denied because:

- ___ DHS does not oppose the motion.
- ___ The Respondent does not oppose to the motion.
- ___ A Response to the motion has not been filed with the court.
- ___ Good cause has been established for the motion.
- ___ The Court agrees with the reasons stated in the opposition to the motion
- ___ The Motion is untimely per_____.
- ___ Other:

Deadlines:

- ___ The application for relief must be filed by_____.
- ___ The Respondent must comply with DHS biometrics instructions by_____.

 Date Immigration Judge


Certificate of Service


This document was served by: [] Mail [] Personal Service
 To: [] Alien [] Alien c/o Custodial Officer [] Alien's Atty/Rep [] DHS

Date: _____ By: Court Staff _____

Name: Yanet

Last Name: Lara Acosta

Alien Number: 

Address: 

PROOF OF SERVICE

On, December 2nd, 2025 I, Yanet Lara Acosta , served a copy of this **Motion For Bond and Custody Redetermination**,

and attached pages to: DHS/ICE, Office of the Principal Legal Advisor,
(name of party served)

at the following address: 1015 Jackson-Keller Rd, Suite 100, San Antonio, Texas 78213
(address of party served)

by First-Class Mail.

(method of service, for example overnight courier, hand-delivery, first class mail)

(signature)

(date)