

UNITED STATES DISTRICT COURT
DISTRICT OF VERMONT

Danielli De Souza Ribeiro,

Petitioner,

-against-

Jonathan Turek, Interim-Superintendent, Chittenden
Regional Correctional Facility – South Burlington;
Gadyaces Serralta, In His Official Capacity as Director of
the United States Marshals Service; Patricia Hyde, In Her
Official Capacity As Acting Boston Field Office Director,
Immigration And Customs Enforcement, Enforcement And
Removal Operations; David W. Johnston, In His Official
Capacity as Vermont Sub-Office Director Of Immigration
And Customs Enforcement, Enforcement And Removal
Operations; Todd M. Lyons, In His Official Capacity As
Acting Director, U.S. Immigration And Customs
Enforcement; Kristi Noem, In Her Official Capacity As
Secretary Of The United States Department Of Homeland
Security; And Pamela Bondi, In Her Official Capacity As
U.S. Attorney General,

Respondents.

Case No. 2: 26-cv-15

**AMENDED PETITION
FOR WRIT OF
HABEAS CORPUS**

**ORAL ARGUMENT
REQUESTED**

INTRODUCTION

1. This is a petition for writ of habeas corpus, filed on behalf of Ms. Danielli De Souza Ribeiro (“Ms. De Souza Ribeiro” or “Petitioner”), who was illegally detained by the U.S. Marshals Service at Chittenden Regional Correctional Facility (“CRCF”) in South Burlington, Vermont, from approximately January 21, 2026 to January 23, 2026, and who is now unlawful detained by Immigration and Customs Enforcement (“ICE”) in the same facility.

2. Ms. De Souza Ribeiro’s country of origin is Brazil. She entered the United States without inspection on November 7, 2025, under the control of human smugglers. Shortly after crossing the border, she was apprehended by Border Patrol officers. She has been detained at CRCF ever since.

3. Three days later, on November 10, 2025, Ms. De Souza Ribeiro was charged with criminal illegal entry and taken into the custody of the U.S. Marshals Service. On information and belief, Ms. De Souza Ribeiro met with the U.S. Attorney’s Office for the District of Vermont on January 15, 2026, to provide information about the individuals who lured her to Canada by means of fraud and then smuggled her across the border into the United States. On January 21, 2026, the criminal charge was dismissed. *See* Exh. 1, Order of Dismissal.

4. From approximately January 21, 2026 to January 23, 2026,¹ despite the lack on any extant criminal charges, Ms. De Souza Ribeiro was detained by the US

¹ The dates of Petitioner’s unlawful detention are calculated based in part upon a redacted Prisoner Remand or Order to Delivery and Receipt for United States Prisoners dated January 23, 2026, which document was furnished by Respondent’s counsel to Petitioner’s counsel on January 30, 2026. *See* Exh. 6.

Marshalls at CRCF. *See* Exh. 2, Petitioner Movement and Legal Status History Report; *see* Exh. 6, Prisoner Remand or Order to Delivery and Receipt for United States Prisoners. Because the Marshalls lacked a legal basis to continue her confinement after the dismissal of her criminal charge, her detention was unlawfully.

5. On January 23, 2025, custody of Ms. De Souza Ribeiro was returned to the Department of Homeland Security. Exh. 6.

6. At present, Respondents assert that Petitioner's custody is governed by 8 U.S.C. 235(b)(1)(B)(IV), applicable to individuals in expedited removal proceedings, and that she is ineligible for release on bond.

7. On February 5, 2026, Petitioner mailed to USCIS a petition for T nonimmigrant status. *See* Exh. 5. Because Ms. De Souza Ribeiro is a survivor of human trafficking, her detention is governed by Section 236 of the Immigration and Nationality Act, which section provides for release on bond for certain noncitizens who are neither a danger to the community nor a flight risk. *See* 8 C.F.R. § 1214.2(a) (providing that applicants for T nonimmigrant status "who [are] in custody and requests bond or a bond redetermination will be governed by the provisions of part 236 of this chapter).

8. Accordingly, because Respondents have already unlawfully detained Petitioner, and continue to detain her without any opportunity to seek bond, to safeguard Petitioner's statutory, constitutional, and regulatory rights to be free from unlawful detention, this Court should grant the instant petition for a writ of habeas corpus and order that Petitioner be released immediately.

JURISDICTION

7. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*

8. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

9. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

VENUE

9. Venue is proper because Petitioner is detained at Chittenden County Correctional Facility in South Burlington, Vermont, within the jurisdiction of this District.

REQUIREMENTS OF 28 U.S.C. § 2243

10. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return “within *three days* unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.* (emphasis added).

11. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most important writ known to the constitutional law of England, affording

as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement.”

Fay v. Noia, 372 U.S. 391, 400 (1963) (emphasis added).

PARTIES

12. Petitioner is currently detained at the Chittenden Regional Correctional Facility in South Burlington, Vermont. She is in the custody, and under the direct control, of Respondents and their agents.

13. Respondent Jonathan Turek is the Interim-Superintendent of Chittenden Regional Correctional Facility – South Burlington and, therefore, he is the immediate custodian of Petitioner. *See Ozturk v. Trump*, — F. Supp. 3d —, 2025 WL 1145250, at *8 (D. Vt. Apr. 18, 2025) (discussing immediate custodian rule). At all relevant times hereto, Respondent Turek’s address is Chittenden Regional Correctional Facility, 7 Farrell Street, South Burlington, Vermont 05403.

14. Respondent Gadyaces Serralta is sued in his official capacity as the Director of the United States Marshals Service. Respondent Serralta is a legal custodian of Petitioner and has authority to release Ms. De Souza Ribeiro. At all relevant times hereto, Respondent Serralta’s address is 1215 S. Clark St., Arlington, VA 22202.

15. Respondent Patricia Hyde is sued in her official capacity as the Acting Director of the Boston Field Office of U.S. Immigration and Customs Enforcement. Respondent Hyde is a legal custodian of Petitioner and has authority to release Ms. De Souza Ribeiro. At all relevant times hereto, Respondent Hyde’s address is 1000 District Avenue, Burlington, Massachusetts 01803.

16. Respondent David W. Johnston is named in his official capacity as the Director of the Vermont Sub-Office of the Boston Field Office for Immigration and

Customs Enforcement (“ICE”) within the United States Department of Homeland Security. In this capacity, he is responsible for the administration of immigration laws and the execution of detention and removal determinations within the District of Vermont and is a custodian of Petitioner. At all relevant times, the Director’s address is 64 Gricebrook Road, St. Albans, VT 05478.

17. Respondent Todd M. Lyons is named in his official capacity as the Acting Director of ICE. He administers and enforces the immigration laws of the United States, routinely conducts business in the District of Vermont, is legally responsible for pursuing efforts to remove the Petitioner, and as such is the custodian of the Petitioner. At all times relevant hereto, Respondent Lyons’s address is ICE, Office of the Principal Legal Advisor, 500 12th St. SW, Mail Stop 5900, Washington DC 20536-5900.

18. Respondent Kristi Noem is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security (DHS). In this capacity, Respondent Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees U.S. Immigration and Customs Enforcement and U.S. Customs and Border Protection, the component agency responsible for Petitioner’s detention. Respondent Noem is a legal custodian of Petitioner.

19. Respondent Pamela Bondi is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that capacity, she has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review (EOIR), which administers the immigration courts and the BIA. Respondent Bondi is a legal custodian of Petitioner.

IRREPARABLE INJURY

19. Irreparable injury is presumed in the presence of a violation of constitutional rights. *Jolly v. Coughlin*, 76 F.3d 468, 482 (2d Cir. 1996). “[T]here is no question that detention causes irreparable harm: indeed, every minute that someone is unlawfully denied freedom results in an injury that really can never be remedied.” *Alvarez Ortiz v. Freden*, 2025 U.S. Dist. LEXIS 217654, 2025 WL 3085032, at *11 (W.D.N.Y. Nov. 4, 2025). See *Taylor v. Town of Cabot*, 2017 VT 92, ¶ 41 (irreparable harm is established by “a deprivation of liberty or constitutional freedom that cannot be ‘undone’ through the payment of money”); *Wells v. DeMarco*, 168 A.D.3d 31, 39 (2018) (“Arrest and detention [based on an ICE detainer] are deprivations of freedom.”); *Esparza v. Nobles County*, 2019 WL 4594512, *10 (preliminary injunction upheld where trial court found “irreparable harm” in the “continued detention of respondents [based on an ICE detainer] after their release from state custody”); *Ramon v. Short*, 2020 MT 69, ¶ 12 (“Any deprivation of one’s physical liberty amounts to an infringement upon [a] fundamental right”).

20. Because Respondents are detaining Petitioner in violation of her constitutionally protected rights, and because such detention causes irreparable injury, the Court should exercise jurisdiction over the instant petition for habeas corpus under 8 U.S.C. § 2241.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

21. There is no statutory requirement that a habeas petitioner exhaust administrative remedies before challenging her detention by immigration officials. Because Congress is silent on the issue, courts have applied a judicially-imposed

requirement that a petitioner must exhaust his administrative remedies before seeking federal court intervention. *Araujo-Cortes v. Shanahan*, 35 F. Supp. 3d 533, 538 (S.D.N.Y. Aug. 5, 2014).

22. Such exhaustion is not required, however, when to do so would be futile or would result in irreparable injury. *Monestime v. Reilly*, 704 F. Supp. 2d 453, 456-457 (S.D.N.Y. April 9, 2010).

23. Here, exhaustion would be futile. It is common knowledge that the current administration is doing everything in its power to encourage non-citizens to leave our country. *See e.g. Trump v. Illinois*, 2025 U.S. LEXIS 4766 (Dec. 23, 2025) (the President unlawfully federalized the Illinois National Guard to support ICE enforcement actions); *Washington v. Trump*, 145 F.4th 1013 (9th Cir. 2025) (the President violated “the plain language of the Fourteenth Amendment’s grant of citizenship to ‘all persons born in the United States and subject to the jurisdiction thereof.’”).

24. It is also common knowledge that the administration is seeking to scare non-citizens into leaving the United States. *See ‘Shock and awe’: What Trump ‘border czar’ Tom Homan has said he plans to do starting on Day 1*, Levine, Mike, abcNews, November 18, 2024 (available at <https://abcnews.go.com/US/shock-awe-trump-border-czar-tom-homan-plans/story?id=115972346>) (last viewed December 30, 2025); *See also* @WhiteHouse X postings.

25. Any argument that Petitioner could find relief for her unlawful arrest and detention within the U.S. Department of Homeland Security (the Department) or the Executive Office for Immigration Review (EOIR), is fanciful. *See e.g. Porras v. O’Neill*, 2025 U.S. Dist. LEXIS 263464 (E.D. Pa, Dec. 22, 2025) (granting petition for habeas

corpus and noting that “[t]he law is piled high against the Government’s position [that noncitizens who entered without inspection are subject to mandatory detention under 8 U.S.C. § 1225(b)(2)] . . . [and that] to rely on hope in a setting where reason is king — to move from myth to the modern, from the sublime to the ridiculous — is an enterprise which resembles a game of whack-a-mole, in which the mole (here, the Government) insists on repeatedly volunteering to get struck by the judicial gavel).

26. Accordingly, Petitioner is not required to petition the Department or EOIR prior seeking relief before this Court.

STATEMENT OF FACTS

Background on Ms. De Souza Ribeiro

19. Ms. De Souza Ribeiro is a 22-year-old citizen of Brazil. She has no criminal record, other than the dismissed charges related to her entry to the United States.

20. Prior to leaving her home country, Ms. De Souza Ribeiro lived with her parents and two brothers in Brazil.² [REDACTED]

[REDACTED]

in her community. Ultimately, Ms. De Souza Ribeiro concluded that she had no choice but to flee to North America to find safety and stability.

Ms. De Souza Ribeiro fell victim to an international trafficking scam.

27. On information and belief, Ms. De Souza Ribeiro initially applied for a visa to enter the United States in July of 2025 but her application was denied.

² All facts alleged herein are based on information and belief. Ms. De Souza Ribeiro intends to file a sworn declaration supporting this motion as soon as possible.

28. Subsequently, Ms. De Souza Ribeiro began investigating other avenues for moving to the United States or Canada with valid authorization. She found a website for a company that purported to provide travel packages to [REDACTED] that included guaranteed housing, employment, and a work permit. Believing that this was her best, if not only, option, Ms. De Souza Ribeiro borrowed money and submitted her payment to the website.

29. From the time she began her journey, the traffickers kept track of her by messaging her constantly to make sure she went to the airport and made every connecting flight until she landed in [REDACTED]. All of the messages Ms. De Souza Ribeiro received came from different numbers on [REDACTED] to hide the identity of the sender.

30. Instead of procuring any kind of legitimate work visa for her as promised, the traffickers instructed Ms. De Souza Ribeiro to claim asylum at Canadian Customs.

31. When she went through Customs in [REDACTED] Ms. De Souza Ribeiro explained that she was seeking asylum and showed the Customs agent the information she had saved from the trafficker's website. The Customs agent gave Ms. De Souza Ribeiro an asylum application to complete, but informed her that the website was not legitimate. The Customs agent seized Ms. De Souza Ribeiro's passport as part of the Canadian asylum application process.

32. Despite her discovery that she had likely been scammed, Ms. De Souza Ribeiro left the airport and checked into the hostel where the traffickers had instructed her to stay. She did not know where else to go. She went to a coffee shop nearby to get something to eat and consider what to do next. A man approached her, and they started

chatting in Portuguese. She told him that she was alone with no job and no housing and did not know what to do. He told her he could arrange for her to go to the United States.

33. That night, she received another [REDACTED] message from someone who told her they could get her into the United States for a fee, and they would send a car to get her at 3 am. She agreed to be picked up and got into the car when it arrived. There was another woman in the car, and a man was driving. They drove to a wooded area near the border. She and the woman exited the car and were met by a young man wearing a ski mask over his face. The young man said he would guide the two women over the border, where they would be picked up and driven to Boston.

34. After several hours of difficult hiking in the dark, during which Ms. De Souza Ribeiro injured her feet and lost her phone, the group encountered Border Patrol agents. Border agents apprehended Ms. De Souza Ribeiro and the other woman; the trafficker escaped on foot.

35. Border Patrol officers transported Ms. De Souza Ribeiro to the Chittenden Regional Correctional Facility. On November 10, 2025, she was charged with criminal illegal entry in the U.S. District Court for the District of Vermont, and the U.S. Marshals Service assumed custody of Petitioner. She remained incarcerated at CRCF during the pendency of her criminal case.

Ms. De Souza Ribeiro's cooperation with law enforcement.

36. On January 15, 2026, Ms. De Souza Ribeiro and her defense attorney met with representatives of the United States Attorney's Office so she could share the details of how she was lured to Canada and then smuggled into the United States by fraudulent means.

37. On January 21, 2026, the United States dismissed the criminal charges against Ms. De Souza Ribeiro. *See* Exh. 1, Order of Dismissal.

38. On January 23, 2026, the Department of Homeland Security once again took custody of Ms. De Souza Ribeiro.

Ms. De Souza Ribeiro has suffered significant harm as the result of her ongoing incarceration.

39. While incarcerated, Ms. De Souza Ribeiro [REDACTED]

[REDACTED] She has suffered significant fear and anxiety as the result of this experience, [REDACTED]

Ms. De Souza Ribeiro is an applicant for T nonimmigrant status.

40. On Thursday, February 6, 2026, Ms. De Souza Ribeiro's counsel mailed to United States Citizenship and Immigration Services (USCIS) her application for T nonimmigrant status on Form I-914, as well as Form I-192 (Advanced Permission to Enter as Nonimmigrant). *See* Exh. 5.

Ms. De Souza Ribeiro is awaiting her Credible Fear Interview and is preparing an application for U nonimmigrant status (U Visa).

41. During her initial processing following arrest by DHS, the Department recorded Ms. De Souza Ribeiro's fear to return to Brazil and consequently she is awaiting a credible fear interview. As of today's date, this interview has not taken place.

42. Ms. De Souza Ribeiro is also currently working with counsel to prepare an application for a U-Visa based on her status as a victim of a qualifying crime (the assault she suffered at CRCF).

The U.S. Marshals Service and the Vermont State Department of Corrections unconstitutionally detained Ms. De Souza Ribeiro following the dismissal of her criminal case

43. From January 21, 2025 to January 23, 2025, Ms. De Souza Ribeiro was held in the Chittenden Regional Correctional Facility by the U.S. Marshalls without any pending criminal charges, in violation of law. *See* Exh. 2, Petitioner Movement and Legal Status History Report; *see* Exh. 6, Prisoner Remand Receipt.

CLAIMS FOR RELIEF

COUNT ONE:

Violation of Fourth Amendment of the United States Constitution

44. Petitioner realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

45. Ms. De Souza Ribeiro's detention after the dismissal of her criminal charges constituted a civil immigration arrest for which the U.S. Marshals Service and Vermont State Department of Corrections lacked authority under Federal and Vermont law. 28 USC 566 (e)(1) (list of authorized actions by the US Marshals Service); 8 CFR 287.5 (list of immigration officers who may effect civil immigration arrests); 28 V.S.A. §§ 301, 363, 551, 551a(a) (Department of Corrections' has limited authority to arrest only people on probation, supervised community sentence, or furlough); *See Lunn v. Commonwealth*, 477 Mass. 517 (2017) (holding that "Massachusetts law provides no authority for Massachusetts court officers to arrest and hold an individual solely on the basis of a Federal civil immigration detainer, beyond the time that the individual would otherwise be entitled to be released from State custody"); *Ramon v. Short*, 399 Mont. 254 (2020) (same, Montana law); *Wells v. Demarco*, 88 N.Y.S.3d 518 (N.Y. App. Div. 2018) (same, New York law); *Esparza*

v. Nobles County, 2019 WL 4594512 (Ct. App. Minn.) (same, Minnesota law); *Creedle v. Miami-Dade County*, 349 F.Supp.3d 1276, 1307-08 (S.D.Fla. 2018) (same, Florida law).

46. “[I]t is not a crime for a removable alien to remain present in the United States.” *Arizona v. United States*, 567 U.S. 387, 407 (2012). Rather, it is a civil violation.

47. Absent the specialized training required of immigration officers, the U.S. Marshals do not have the authority to make civil immigration arrests. 28 USC 566 (e)(1) (list of authorized actions by the US Marshals Service); *N.S. v. Dixon*, 141 F.4th 279 (D.C. Cir. 2025) (holding that while a January 2025 Order by Acting Secretary of Homeland Security purported to grant U.S. Marshals the authority to perform certain functions of immigration officers, including “apprehending, any alien who is in the United States in violation of [the INA],” it does not grant them the authority to do so without the proper training required of all immigration officers pursuant to 8 USC 287.5(c)(1) and (e)(3)).

48. Based on the foregoing, Ms. De Sousa Ribeiro was arrested and detained without probable cause in violation of the Fourth Amendment to the United States Constitution and must be released immediately.

COUNT TWO:

Violation of the Due Process Clause of the Fifth Amendment to the United States Constitution

49. Petitioner realleges and incorporates by reference the foregoing paragraphs as if fully set forth herein.

50. The Due Process Clause of the United States Constitution applies to “all persons within the United States, including aliens, whether their presence is lawful, unlawful, temporary, or permanent.” *Zadvydas v. Davis*, 533 U.S. 678, 679 (2001).

51. The Fifth Amendment of the United States Constitution demands that “[n]o person shall be . . . deprived of life, liberty, or property, without due process of law.” U.S. Const. amend. V. (emphasis added).

52. In the case at bar, Petitioner was deprived of her liberty without due process of law from January 21, 2026 to January 23, 2026 when the U.S. Marshalls held her in custody without authority under the law.

53. Respondents also deprive Petitioner of her liberty without due process with each day that passes where her custody is not governed by section 236 of the Immigration and Nationality Act – which section provides for release on bond for certain noncitizens who are neither a flight risk nor a danger to the community. *See* 8 C.F.R. § 1214.2(a) (requiring that T visa applicants be afforded a custody redetermination hearing under Section 236 of the INA). Respondent’s maintain, to the contrary, that Petitioner’s custody is governed by Section 235 of the INA.

54. No special circumstances exist to justify the Petitioner’s detention. Petitioner is neither a flight risk nor a danger to the community.

55. Accordingly, with each minute that passes, Respondents are violating Petitioner’s rights to due process guaranteed under the United States Constitution.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Order that Petitioner shall not be transferred outside the District of Vermont;
- (3) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days;
- (4) Declare that Petitioner's detention violates the Fourth Amendment right against warrantless seizure and the Fifth Amendment right to substantive and procedural due process;
- (5) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately;
- (6) Grant any further relief this Court deems just and proper.

Respectfully submitted,

/s/ Brett Stokes, Esq.
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Pro Hac Vice

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

Dated: February 6, 2026

I represent Petitioner, DANIELA DE SODIA RUIFERO, and submit this verification on her behalf. I hereby verify that the factual statements made in the foregoing Amended Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 6th day of February, 2026

/s/ Christopher Worth
Christopher Worth

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, DANIELLI DE SOUZA RIBEIRO, and submit this verification on her behalf. I hereby verify that the factual statements made in the foregoing Amended Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Exhibit 5: Cover letter and mailing label for Petitioner's T Visa Application

Dated this 6th day of February, 2025.

/s/ Christopher Worth
Christopher Worth

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF VERMONT

EXHIBIT LIST

Exhibit 1: Order of Dismissal

Exhibit 2: Petitioner Movement and Legal Status History Report

Exhibit 3: Form I-860

Exhibit 4: Notice to Alien Ordered Deported

Exhibit 5: Cover letter and mailing label for Petitioner's T Visa Application

Exhibit 6: Prisoner Remand Receipt

United States Marshal, Federal Correctional Facility,
capacity as 180
Director of the United States Marshal Service; PATRICIA
BYRNE, in her official capacity as the Acting Boston Field
Office Director, Immigration and Customs Enforcement,
Enforcement and Removal Operations; DAVID W.
JOHNSTON, in his official capacity as the Vermont
Sub-Office Director of Immigration and Customs
Enforcement, Enforcement and Removal Operations;
TODD M. WELLS, in his official capacity as the Acting
Director, U.S. Immigration and Customs Enforcement,
Enforcement and Removal Operations; KATHY MOORE, in her official capacity as Secretary of
the United States Department of Homeland Security; and
ANGELA BONDI, in her official capacity as U.S.
Attorney General.

Exhibits

**FEDERAL RESPONDENTS' OPPOSITION TO
AMENDED PETITION FOR WRIT OF HABEAS CORPUS**

PRELIMINARY STATEMENT

As she alleges in her Amended Petition for Writ of Habeas Corpus, UCF No. 14, Petitioner
Danielle De Souza Tibbets was apprehended by United States Border Patrol agents on November
7, 2025, after she hiked through the Canadian woods and crossed into Vermont, see at ¶¶ 1, 15.
The same day, CBP determined that Petitioner was inadmissible under 8 U.S.C.