

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO

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ALEX ARMANDO MARTINEZ-		)	Case No. 1:26-cv-355-WJM
ORELLANA,		)	
		)	
<i>Petitioner,</i>		)	
		)	
v.		)	<b>REPLY TO RESPONDENTS' RESPONSE TO</b>
		)	<b>PETITIONER'S MOTION TO ENFORCE</b>
		)	
ROBERT HAGAN, et al.,		)	
		)	
<i>Respondents.</i>		)	
		)	
		)	
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On February 13, 2026, this Court granted Petitioner Alex Armando Martinez-Orellana's petition for a writ of habeas corpus. ECF No. 14. On March 5, 2026, he filed a motion to enforce on the basis that not all of his property (938 dollars, specifically) were not returned to him. *See* ECF No. 19. The Court ordered Respondents to provide an update by today regarding efforts to retrieve Mr. Martinez-Orellana's property records, and, on March 13, 2026, Respondents filed a response. However, Respondents' filing does not address the relevant points in Mr. Martinez-Orellana's claim.

First, Respondents' declaration and evidence do not include all of Mr. Martinez-Orellana's property. Notably, the property records do not mention *any* cash, a wallet, credit cards, keys, or a phone. *See* ECF No 21-1 at p. 5.<sup>1</sup> Yet, his declaration lists that he was arrested while driving and

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<sup>1</sup> Mr. Martinez-Orellana cites to the adobe page numbers of document number 21-1.

that the processing officer took his IDs (which the property record does list) out of his wallet. *See* ECF No. 19-1. Thus, this document does not appear to be complete and accurate.

Second, Respondents' response ignores Mr. Martinez-Orellana's declaration indicating that ICE officers told him via the complaint system in the facility that "ICE said they had the 950 dollars, but they were keeping it because in case I was deported, they were going to use that money for my plane ticket back to my country of origin." ECF No. 19-1 at 1. However, Respondents seemingly made no attempt to get this complaint record from GEO to confirm.<sup>2</sup> *See* ECF No. 21 at 2. Thus, Respondents' attempt to shift the blame to the Wyoming State Patrol should not be accepted as there is nothing contradicting Mr. Martinez-Orellana's account that ICE admitted to having the full amount of money.

Third, it is not clear why Wyoming state police would have any records of Mr. Martinez-Orellana's arrest when he was arrested roadside by ICE and booked into ICE custody. *See* ECF No. 1-2 at p.3 (Form I-213, describing "Encounter Data").

Ultimately, Respondents' response does not explain that they do not have Mr. Martinez-Orellana's property. Accordingly, Mr. Martinez-Orellana moves the Court for enforcement of the order, requiring ICE to return *all* of his personal belongings, including the \$938 in cash that was not returned. *Cortes v. Guadian*, 2026 WL 327906, at \*1 (D. Colo. Feb. 6, 2026).

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<sup>2</sup> Respondents indicate that they encouraged Mr. Martinez-Orellana's counsel to contact the GEO Group directly on this issue. As Mr. Martinez-Orellana's counsel previously relayed to counsel for Respondents, she has entered her appearance on behalf of the Warden for the facility and they are a represented party in this action.

Dated: March 13, 2026

Respectfully submitted,

/s/ Jessica A. Dawgert

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