

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE

RICARDO DE LEON TREJO,

Petitioner,

v.

SCOTT LADWIG AND TOM SPANGLER,

Respondents.

Case No.: 3:26-cv-00047

SHERIFF TOM SPANGLER'S RESPONSE TO
PETITION FOR WRIT OF HABEAS CORPUS

Comes now the respondent, Knox County Sheriff Tom Spangler, by and through undersigned counsel, pursuant to the Federal Rules of Civil Procedure and this Honorable Court's Order (Doc. 4), and hereby responds to the petitioner's Petition for a Writ of Habeas Corpus as follows

The petitioner is not in the custody of Sheriff Tom Spangler. (Exhibit 1, Declaration of Lt. Beau Keck). Petitioner was brought into the custody of the Knox County Sheriff's Office on January 27, 2026, by Immigration and Customs Enforcement ("ICE"), on an immigration detainer. (*Id.*). On February 4, 2026, ICE demanded that Petitioner be returned to its custody, such transfer of custody occurring at 8:33 a.m. Eastern Time. (*Id.*). At the time of the transfer of custody, the Knox County Sheriff's Office did not have an order from any court ordering that Petitioner remain in place pending further notice. (*Id.*).

Counsel for petitioner provided Sheriff Spangler notice of the Court's Order granting a Temporary Restraining Order on February 4, 2026 at 12:10 p.m. Eastern Time, by way of email, after the time that petitioner was released. Additionally, the records of the Clerk of the Court show that the Court's Order was entered on February 4 at 11:47 a.m. Eastern Time, after the time that petitioner was released. Consequently, Sheriff Spangler was neither on notice of the Court's Order prior to release of the petitioner, nor had the Court's Order issued prior to the release of the petitioner.

Sheriff Spangler takes no position as to whether the petition for habeas corpus should be granted. Furthermore, Sheriff Spangler cannot provide the relief the petitioner seeks because the

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petitioner is not in the custody of the Knox County Sheriff's Office.

Respectfully submitted.

s/ Federico A. Flores

Federico A. Flores, BPR # 029806

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CERTIFICATE OF SERVICE

I hereby certify that on February 6, 2026, the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All others will be served by regular United States Mail, postage prepaid. Parties may access this filing through the Court's electronic filing system.

s/ Federico A. Flores

Federico A. Flores