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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

ARTUR SORVANOV,

Petitioner,

v.

KRISTI NOEM, Secretary of the
Department of Homeland Security,
PAMELA JO BONDI, Attorney General,
TODD M. LYONS, Acting Director,
Immigration and Customs Enforcement,
JESUS ROCHA, Acting Field Office
Director, San Diego Field Office,
CHRISTOPHER LAROSE, Warden at
Otay Mesa Detention Center,

Respondents.

Civil Case No.: 26-cv-1339-JES-BJW

**Traverse in
Support of
Petition for Writ of
Habeas Corpus**

1 In his amended habeas petition, Mr. Sorvanov explained that he is a
2 political dissident from Russia who was repeatedly tortured before fleeing to the
3 United States. He argued that his detention without a bond hearing for seven
4 months violated due process. As the remedy, he requested that this Court grant his
5 immediate release or at least a bond hearing with additional safeguards—
6 particularly that this Court 1) the IJ shall consider alternative conditions of release
7 and Petitioner’s ability to pay bond; and 2) Respondents shall make a complete
8 record of the bond hearing available to Petitioner’s counsel.

9 In response, Respondents state that they “do not oppose a bond hearing in
10 this matter.” Dkt. 6 at 2. However, they state that Mr. Sorvanov’s “alternative
11 forms of relief” are “unwarranted and fall outside the scope of this habeas
12 petition.” Dkt. 6 at 2. Thus, the only dispute in this case is what form of relief
13 Mr. Sorvanov should receive.

14 Mr. Sorvanov maintains that immediate release is the correct remedy in his
15 case. However, if this Court only orders the government to provide a bond
16 hearing, he asks that this Court include three requirements it has imposed in
17 previous cases:

- 18 a. At the hearing, the government SHALL BEAR the burden of
19 establishing by clear and convincing evidence that Petitioner is a
20 danger to the community or a flight risk if released.
- 21 b. The IJ SHALL consider alternative conditions of release and
22 Petitioner's ability to pay bond if he or she determines bond is
23 appropriate.
- 24 c. Respondents SHALL make a complete record of the bond hearing
25 available to Petitioner and his counsel.

26 *See Sandesh v. Noem*, 26-cv-846-JES-DDL, Dkt. 13 at 11 (S.D. Cal. Mar. 4,
27 2026). Mr. Sorvanov also requests that this Court retain jurisdiction to review the
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1 immigration judge bond decision to ensure compliance with the Court's order and
2 due process.

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4 Respectfully submitted,

5 Dated: March 12, 2026

s/ Kara Hartzler

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