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9
10 **UNITED STATES DISTRICT COURT**
11 **SOUTHERN DISTRICT OF CALIFORNIA**

12 JAIME FLORES-BALDERAZ,

13 Petitioner,

14 v.

15 PAMELA BONDI, U.S. Attorney
16 General, KRISTI NOEM, Secretary of
17 DHS, TODD LYONS, Director of ICE,
18 CHRISTOPHER LAROSE, Warden at
19 Otay Mesa Detention Center,

20 Respondents.

Civil Case No.: 26-cv-1424-AGS

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

21 On March 5, 2026, Jaime Flores-Balderaz filed a habeas petition requesting
22 this Court order his “immediate release.” Flores-Balderaz Petition at 1, ECF No.

23 1. The government filed its response to Mr. Flores-Balderaz’s petition on March
24 23, 2026. *See* Gov. Response, ECF No. 13. The government does not dispute any
25 of the facts set forth in Mr. Flores-Balderaz’s petition. *Id.* Moreover, the
26 government concedes that this Court and many other courts in this district have
27 repeatedly granted petitions and ordered bond hearings in exactly this type of
28 case. *Id.* at 3; *see Nayyer v. LaRose*, No. 25-CV-3111-AGS-DDL, ECF Nos. 7, 8
(S.D. Cal. Dec. 12, 2025).

Mr. Flores-Balderaz was brought to the United States by his parents when
he was only two years old. Exhibit A, Immigration Attorney Decl. at ¶ 2. The

1 family entered the country on April 10, 1999. *Id.* Mr. Flores-Balderaz has
2 remained in the United States ever since. *Id.* at ¶ 3. He has never left the country.
3 *Id.* Mr. Flores-Balderaz was detained by ICE in Worcester County, Massachusetts
4 on September 5, 2025. *Id.* at ¶ 4.

5 Thus, Mr. Flores-Balderaz was not apprehended at the border. He was
6 detained within the United States after nearly thirty years of living here and never
7 leaving. This places him among the class of people that are entitled to a bond
8 hearing under 8 U.S.C. § 1226(a), this Court's prior decisions, and *Maldonado-*
9 *Bautista v. Noem*, No. 5:25-CV-01873-SSS-BFM, 2025 WL 3713987, at *12
10 (C.D. Cal. Dec. 18, 2025).

11
12 Respectfully submitted,

13
14 Dated: March 25, 2026

s/ Camille Fenton

Camille Fenton

Federal Defenders of San Diego, Inc.

Attorneys for Mr. Flores-Balderaz

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EXHIBIT A

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

JAIME FLORES-BALDERAZ,

Petitioner,

Civil Case No.: 26-cv-1424-AGS

v.

PAMELA BONDI, U.S. Attorney
General, KRISTI NOEM, Secretary of
DHS, TODD LYONS, Director of ICE,
CHRISTOPHER LAROSE, Warden at
Otay Mesa Detention Center,

Respondents.

**Declaration of
Immigration Attorney Morris
Wilner in Support of Petition
for a Writ of Habeas Corpus**

I, Morris Wilner, declare:

1. I represent Jaime Flores-Balderaz in immigration court.
2. Mr. Flores-Balderaz was brought to the United States as a child on April 10, 1999. He was approximately two years old at the time.
3. This was his first and only entrance into the United States. Mr. Flores-Balderaz has lived here ever since and has never left the country.
4. Mr. Flores-Balderaz was detained by ICE in Worcester County, Massachusetts, on September 5, 2025.

I declare under penalty of perjury that the foregoing is true and correct, executed on March 25, 2026.

/s/ Morris Wilner

MORRIS WILNER

Declarant