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

10 NATALIE CAMARGO ALEJO,

Case No.: 26-cv-1511-JO-SBC

11 Petitioner,

RETURN TO HABEAS PETITION

12 v.
13

14 KRISTI NOEM, Secretary of the
Department of Homeland Security; et al.,

15 Respondents.
16

17 Petitioner is a native and citizen of Mexico, who was ordered removed from the
18 United States but granted withholding of removal to Mexico in September 2018. *See* ECF
19 No. 1 at 5; Exh. 1 at 1.¹ Petitioner was thereafter released from Immigration and Customs
20 Enforcement (ICE) custody under an Order of Supervision (OSUP). *See* ECF No. 1 at 28,
21 ¶ 3. On March 21, 2025, Petitioner was convicted of first-degree burglary in violation of
22 California Penal Code § 459 and sentenced to two years in prison. *See* Exh. 1 at 3.
23 Following Petitioner's incarceration and OSUP violation, she was transferred to ICE
24 custody on September 4, 2025, for purposes of executing her removal to a third country.
25

26 ¹ The attached exhibits are true copies, with redactions of private information, of
27 documents obtained from ICE counsel. These documents reference Petitioner's legal
28 name: "Jose Camargo Alejo," which is the same name and A-number referenced in
Petitioner's filing. *See* ECF No. 1 at 5 n.2, 30.

1 *See id.* at 6, 7. Since then, attempts to identify a third country for Petitioner’s removal have
2 not been successful, and undersigned counsel is unable to ascertain sufficient facts at this
3 time to establish that there is a significant likelihood of removal in the reasonably
4 foreseeable future. *See Zadvydas v. Davis*, 533 U.S. 678 (2001).

5 Respondents therefore acknowledge that Petitioner is entitled to be released from
6 custody subject to conditions of supervision. *See* 8 U.S.C. §§ 1231(a)(3), (6); 8 C.F.R.
7 § 241.13(h)(1); *Ba v. Lyons*, No. 25-cv-2871-CAB-BJW, 2026 WL 218936, at *1 (S.D.
8 Cal. Jan. 27, 2026) (“The habeas statute does not empower courts to manage ICE
9 supervision programs.”) (citing 28 U.S.C. § 2241(c)(3)); *Khachikian v. Casey*, No. 25-cv-
10 3737-GPC-JLB, ECF No. 13 (S.D. Cal. Jan. 13, 2026) (“Ultimately, ICE has discretion to
11 impose conditions on release.”).

12
13 DATED: March 19, 2026

Respectfully submitted,

ADAM GORDON
United States Attorney

14
15 *s/Kim A. C. Gregg*
KIM A. C. GREGG
Assistant United States Attorney

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17 Attorneys for Respondents
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