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15 Attorneys for Petitioner,

16 DENNIS JOSE PINA ARANDA

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

19 DENNIS JOSE PINA ARANDA.

CASE NO.: '26CV1637 TWR SBC

20 Petitioner,

21 vs.

**DENNIS JOSE PINA ARANDA'S
PETITION FOR WRIT OF
HABEAS CORPUS**

22 CHRISTOPHER LAROSE, Facility
23 Administrator at Otay Mesa Detention
24 Center, San Diego, California,

25 PATRICK DIVVER, Field Office
26 Director of San Diego Office of
27 Detention and Removal, U.S.

28 Immigrations and Customs
Enforcement, U.S. Department of
Homeland Security, TODD M.

LYONS, Acting Director, Immigration
and Customs Enforcement, U.S.

1 Department of Homeland Security,
2 KRISTI NOEM, Secretary, U.S.
3 Department of Homeland Security,
4 PAM BONDI, Attorney General of the
5 United States, in their official
6 capacities,

Respondents.

7
8 **PETITION FOR WRIT OF HABEAS CORPUS**

9 This is a petition for a Writ of Habeas Corpus filed on behalf of **DENNIS**
10 **JOSE PINA ARANDA** seeking relief to remedy his unlawful detention.
11 Respondents are detaining the Petitioner in violation of his Fifth Amendment due
12 process rights, effectively depriving him of a meaningful bond re-determination
13 hearing, exceeding the limits of the Department of Homeland Security's statutory
14 authority.

15 Petitioner fully cooperated with Respondents in their pursuit of his arrest and
16 detention. Mr. Pina Aranda was arrested at his Immigration and Customs
17 Enforcement ("ICE") check-in on August 12, 2025. The federal agents arrested the
18 Petitioner and placed him in the custody of U.S. Department of Homeland Security
19 ("DHS") ICE where they took him to the Farmville, Virginia detention center. The
20 petitioner's detention was for the purpose of placing him in removal proceedings
21 and possible deportation.

22 Subsequently, Petitioner, through counsel, filed a bond motion with the
23 Annandale Immigration Court. On August 20, 2025, the Immigration Court
24 determined that the Respondent was not a danger to the community nor was he a
25 flight risk and issued a \$5,000 bond. Prior to his detention, Petitioner was working
26 with undersigned counsel to prepare an amended asylum application. He does not
27 have a criminal record. The DHS immediately filed a Notice of Intent to Appeal the
28 bond decision and exerted a stay of the bond decision, but did not serve undersigned

1 counsel. On August 21, 2025, Mr. Pina Aranda's family presented the \$5,000 bond.
2 ICE declined the bond and retained Mr. Pina Aranda in custody. Should the DHS
3 continue to pursue its appeal of the decision, Petitioner will be unable to release
4 during his removal proceedings as the duration of the bond appeal will likely exceed
5 the duration of removal proceedings. In effect, the DHS is exerting the stay as a
6 litigation tactic to deter and limit the Petitioner from pursuing relief in immigration
7 court, unlawfully depriving him of liberty.

8 Petitioner submits that his prolonged detention is in violation of his Fifth
9 Amendment rights. Petitioner's detention is no longer justified under the
10 Constitution or the Immigration and Nationality Act ("INA"). Petitioner seeks an
11 order from this Court declaring his continued detention unlawful and ordering
12 Respondents to allow Petitioner to post bond and be released from their custody.

13 CUSTODY

14 1. Petitioner is in the physical custody of Respondent Christopher LaRose,
15 Facility Administrator of the Otay Mesa Detention Center located in San Diego,
16 California, and Respondent Patrick Divver, Field Office Director for Detention and
17 Removal, ICE. At the time of the filing of this petition, the Petitioner is detained at
18 the Otay Mesa Detention Center in San Diego, California. The Otay Mesa Detention
19 Center contracts with the DHS to detain noncitizens such as Petitioner. Petitioner is
20 under the direct control of Respondents and their agents.

21 JURISDICTION

22 2. This action arises under the Constitution of the United States, the
23 Immigration and Nationality Act ("INA"), 8 U.S.C. § 1101 *et. seq.*, as amended by
24 the Illegal Immigration Reform and Immigrant Responsibility Act of 1996
25 ("IIRIRA"), Pub. L. No. 104-208, 110 Stat. 3009-546. This Court has subject matter
26 jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal
27 question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension
28 Clause), as Petitioner is presently in custody under color of authority of the United

1 States and such custody is in violation of the U.S. Constitution, laws, or treaties of
2 the United States.

3 3. This Court may grant relief under the habeas corpus statutes, 28 U.S.C.
4 § 2241 *et. seq.*, the Declaratory Judgments Act, 28 U.S.C. § 2201 *et seq.*, and the All
5 Writs Act, 28 U.S.C. § 1651.

6 VENUE

7 4. Venue is proper in the United States District Court for the Southern
8 District of California, the judicial district in which Respondents, Christopher LaRose
9 and Patrick Divver reside and where Petitioner is detained. 28 U.S.C. § 1391(e).

10 PARTIES

11 5. Petitioner Dennis Jose Pina Aranda is a national and citizen of
12 Venezuela. He is detained by Respondents pursuant to 8 U.S.C. § 1226.

13 6. Respondent LaRose is sued in his official capacity as the Facility
14 Administrator of the Otay Mesa Detention Center. Respondent LaRose has
15 immediate physical custody of Petitioner pursuant to the facility's contract with ICE
16 to detain noncitizens and is a legal custodian of Petitioner.

17 7. Respondent Divver is sued in his official capacity as the Field Office
18 Director of San Diego Office of Detention and Removal, within ICE. Respondent
19 Divver is a legal custodian of Petitioner and has authority to release him.

20 8. Respondent Todd M. Lyons is sued in his official capacity as the Acting
21 Director of ICE. In this capacity, Respondent Lyons oversees ICE, the component
22 agency responsible for Petitioner's detention.

23 9. Respondent Kristi Noem is sued in her official capacity as the Secretary
24 of the DHS. In this capacity, Respondent Noem is responsible for the
25 implementation and enforcement of the Immigration and Nationality Act, and
26 oversees ICE, the component agency responsible for Petitioner's detention.

27 10. Respondent Pamela Bondi is sued in her official capacity as the
28 Attorney General of the United States and the senior official of the U.S. Department

1 of Justice (“DOJ”). In that capacity, she has the authority to adjudicate removal cases
2 and to oversee the Executive Office for Immigration Review (“EOIR”), which
3 administers the immigration courts and the Board of Immigration Appeals (“BIA”).

4 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

5 11. The petitioner exhausted his administrative remedies to the extent
6 required by law.

7 12. After securing a \$5,000 immigration bond by the Annandale
8 Immigration Court, the Petitioner was immediately blocked from being able to post
9 bond due to an unconstitutional stay of the decision.

10 13. Petitioner fully cooperated with Respondents and did not delay or
11 obstruct his detention.

12 14. Petitioner’s only remedy is by way of this judicial action.

13 **STATEMENT OF FACTS**

14 15. Petitioner is a national and citizen of Venezuela who entered the United
15 States on or around April 27, 2024, and has resided continuously in the United States
16 since his entry.

17 16. Mr. Pina Aranda was released from custody without bond on May 1,
18 2024.

19 17. Mr. Pina Aranda filed a pro se asylum application within the one-year
20 deadline, on November 14, 2024. He engaged undersigned pro bono counsel on June
21 5, 2025, and was working with undersigned pro bono counsel to prepare an amended
22 asylum application when he was arrested at his ICE check-in on August 12, 2025.

23 18. The amended asylum application will establish that Mr. Pina Aranda
24 participated in anti-Maduro protests in his home city of [REDACTED]

1 19. Mr. Pina Aranda was arrested at his regular ICE check-in on August
2 12, 2025. Mr. Pina Aranda has no criminal record in either the United States or in
3 Venezuela.

4 20. Prior to his detention, Mr. Pina Aranda was pursuing regular
5 employment after recently obtaining an Employment Authorization Document on or
6 around June 22, 2025.

7 21. Contrary to the government's statement of the case, Mr. Pina Aranda
8 was detained at his ICE check-in in Richmond, Virginia (after having made regularly
9 scheduled check-ins with ICE before August 12, 2025). He was transported to the
10 Farmville, Virginia detention center where the Immigration Court granted bond at
11 the contested August 20, 2025 hearing.

12 22. On August 20, 2025, the Immigration Court granted bond after finding
13 the DHS failed to establish danger and that any flight risk could be mitigated by
14 conditions/bond. The Immigration Court agreed to the DHS's request to increase the
15 bond from \$1,000 to \$5,000.

16 23. On August 20, 2025, the DHS filed a Notice of Intent to Appeal but did not
17 serve undersigned counsel.

18 24. On August 21, 2025, Mr. Pina Aranda's family presented the \$5,000
19 bond. ICE declined the bond and retained Mr. Pina Aranda in custody.

20 25. On August 28, 2025, ICE transferred Mr. Pina Aranda to Louisiana and
21 then San Diego, California without notice to undersigned counsel and in violation of
22 ICE regulations.

23 26. On September 4, 2025, ICE filed its Notice of Appeal. ICE's Certificate
24 of Service states that it served Mr. Pina Aranda at "508 Waterworks Road, Farmville,
25 Virginia" on September 4, 2025, but Mr. Pina Aranda had been transferred from
26 Farmville, Virginia more than a week before ICE's claimed service at "508
27 Waterworks Road, Farmville, Virginia." The Certificate of Service also stated that
28 ICE had served its Notice of Appeal on undersigned counsel, but ICE did not do so.

1 27. ICE's Form EOIR-26 Notice of Appeal from a Decision of an
2 Immigration Judge Proof of Service states: "WARNING: If you do not complete this
3 section properly, your appeal will be rejected or dismissed." The ICE Proof of
4 Service was not completed properly and contained substantive errors related to
5 service on Mr. Pina Aranda, all in violation of 8 C.F.R. §1003.3(a)(1).

6 28. On September 9, 2025, undersigned counsel attended the previously
7 scheduled Master Calendar hearing with video link to the Farmville, Virginia
8 detention facility. Only after undersigned counsel had waited his turn to appear for
9 Mr. Pina Aranda did the ICE agent advise counsel and the Court that Mr. Pina
10 Aranda had been transferred from Farmville. The ICE agent at Court did not know
11 when or where Mr. Pina Aranda was transferred.

12 29. On September 22, 2025, undersigned counsel attended the re-scheduled
13 Master Calendar hearing with video link to San Diego, California. Undersigned
14 counsel requested additional time to prepare an updated asylum application given
15 the difficulty of coordinating with Mr. Pina Aranda while detained in California.

16 30. Mr. Pina Aranda's updated I-589 asylum application was filed with the
17 Court on November 5, 2025 and is currently pending. The August 20, 2025 bond
18 order sets conditions addressing flight risk and safety.

19 31. Respondents' decision to detain Petitioner is no longer legally
20 justifiable and is capricious and arbitrary. There is no better time for the Court to
21 consider the merits of Petitioner's request for release and clarify that he is entitled
22 to release.

23 **CLAIMS FOR RELIEF**

24 **COUNT ONE**

25 **Violation of Fifth Amendment Right to Substantive and Procedural Due**
26 **Process**

27 32. Petitioner alleges and incorporates by reference paragraphs 1 through
28 31 above.

1 33. The automatic stay provision at 8 C.F.R. § 1003.19(i)(2) violates the
2 Petitioner's substantive due process rights under the Fifth Amendment to the United
3 States Constitution as it subjects him to arbitrary detention.

4 34. Government detention violates the Fifth Amendment "unless the
5 detention is ordered in a *criminal* proceeding with adequate procedural protections
6 or, in certain special and 'narrow' nonpunitive 'circumstances' where a special
7 justification . . . outweighs the 'individual's constitutionally protected interest in
8 avoiding physical restraint.'" *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001)
9 (emphasis in original).

10 35. There is no "special justification" which allows the Respondents to
11 deny the Petitioner the liberty he is entitled to under the Immigration Judge's bond
12 order. The Immigration Judge found the Petitioner was not a danger to the
13 community or a flight risk. Respondents did not identify any specific reason for
14 appealing the Immigration Judge's decision. The automatic stay provision
15 contravenes the decision of an independent fact finder and allows the government to
16 infringe on Petitioner's liberty interest in violation of substantive due process.

17 36. The automatic stay of the bond redetermination grossly deprives the
18 Petitioner of his procedural due process rights. This court applies the three-factor
19 balancing test set out in *Matthews v. Eldridge* in the context of civil immigration
20 detention. *See, e.g., Silva v. Larose*, 2025 WL 2770639 (S.D. Cal. Sept. 29, 2025).
21 The three factors are (1) "the private interest that will be affected by the official
22 action"; (2) "the risk of an erroneous deprivation of such interest through the
23 procedures used, and the probable value, if any, of additional or substitute procedural
24 safeguards"; and (3) "the government's interest, including the function involved and
25 the fiscal and administrative burdens that the additional or substitute procedural
26 requirement would entail." *Matthews v. Eldridge*, 424 U.S. 319, 335 (1976).

27 37. Here, the factors weigh heavily in favor of the Petitioner. First, the
28 Petitioner has a significant private interest at stake. Freedom from bodily restraint

1 “lies at the heart of the liberty that [the Due Process] Clause protects.” *Zadvydas*,
2 533 at 690. The petitioner is being detained hundreds of miles from his family and
3 is experiencing the deprivations of physical detention, including, but not limited to,
4 separation from his family and a lack of privacy. The violation of Petitioner’s liberty
5 interest is even more stark in this situation because the Immigration Judge already
6 determined Petitioner should be released from detention.

7 38. As to the second factor, there is an enormous risk of the erroneous
8 deprivation of Petitioner’s liberty interest. In fact, it has already occurred. Petitioner
9 is categorically not subject to mandatory detention under the INA, as evidenced by
10 the Immigration Judge exercising his discretionary authority to issue Petitioner a
11 bond. Additionally, the automatic stay provision allows Respondents to unilaterally
12 deprive Petitioner of his liberty interest, despite being granted bond from a neutral
13 fact finder. This dangerously conflates the Respondents’ role in immigration
14 proceedings and allows Respondents to usurp the role of the adjudicator.

15 39. Respondents also did not effectuate an individualized assessment as is
16 implied under the automatic stay regulation, which further erroneously deprives
17 Petitioner of his private liberty interest. rights. c lists the procedures that must
18 accompany an automatic stay pursuant to 8 C.F.R. § 1003.19(i)(2). This includes
19 that “to preserve the automatic stay, the attorney for DHS shall file with the notice
20 of appeal a certification by a senior legal official that – (i) the official has approved
21 the filing of the notice of appeal according to review procedures established by DHS;
22 and (ii) the official is satisfied that the contentions justifying the continued detention
23 of the alien have evidentiary support, and the legal arguments are warranted by
24 existing law or by a non-frivolous argument for the extension, modification or
25 reversal of existing precedent of the establishment of new precedent.” 8 C.F.R. §
26 1003.6(c)(1). No such certification was filed in this case as of the date of filing this
27 petition and, as such, the Respondents have failed to follow their own regulatory
28 requirement. With no individualized review as is required under regulation and

1 lacking any factual or legal basis for justifying Petitioner's continued detention, the
2 risk of erroneously depriving Petitioner's liberty is high.

3 40. Further, Respondents did not properly file a notice of intent to appeal
4 the custody redetermination (Form EOIR-43) with the immigration court within one
5 business day of the order. See 8 C.F.R. § 1003.3(a)(1) and 1003.19(i)(2). Under 8
6 C.F.R. § 1003.3(a)(1) an "appeal must reflect proof of service of a copy of the appeal
7 and all attachments on the opposing party. An appeal is not properly filed unless it
8 is received at the [BIA], along with all required documents, fees or fee waiver
9 requests, *and proof of service*" (emphasis added). The DHS filed an improper and
10 defective Proof of Service because it claimed that "Dennis Jose Pina Aranda" was
11 served on September 4, 2025 at "508 Waterworks Rd. Farmville, VA 23901," even
12 though the DHS's own documents establish, Mr. Pina Aranda was transferred from
13 Farmville, Virginia to Otay Mesa, California on August 28, 2025. Additionally,
14 under 8 C.F.R. § 1003.19(i)(2) and the BIA Procedures, the DHS is required to file
15 an EOIR Form-43 for a stay of the Immigration Court's bond decision. *See* BIA
16 Practice Manual 7.3(a)(4)(B). The DHS did not file an EOIR Form-43 in this case.
17 Allowing Petitioner's detention to continue despite the DHS's procedural failures,
18 would deprive Petitioner of his liberty despite the fact that the DHS failed to properly
19 appeal under the automatic stay provision.

20 41. Regarding the availability of additional or substitute procedural
21 safeguards that could ameliorate the risks of erroneous deprivation, the "regulation
22 itself includes an obvious alternative." *Silva*, 2025 WL 2770639, at *5 (*quoting*
23 *Günaydin v. Trump*, 784 F.Supp.3d 1175, 1189 (D. Minn., 2025)). 8 C.F.R. §
24 1003.19(i)(1) provides that "DHS is entitled to seek a discretionary stay (*whether or*
25 *not on an emergency basis*) from the [BIA] in connection with such an appeal at any
26 time". 8 C.F.R. § 1003.19(i)(1) (emphasis added); *see also Silva*, No. 25-CV-2329-
27 JES-KSC, at *5. This would cure some of the procedural due process concerns of
28 the automatic stay because the government would have to demonstrate to the BIA's

1 satisfaction that a stay was appropriate based on an individualized review of
2 Petitioner's case. It would also ensure that another neutral adjudicator is involved in
3 the decision to continue detaining Petitioner.

4 42. Regarding the third *Matthews* factor, the government does not have a
5 significant interest at stake in Petitioner's detention pursuant to the automatic stay
6 provision. Petitioner has no criminal record. The Immigration Judge issued
7 Petitioner's bond based on the reasoning that he is neither a danger to the community
8 nor a flight risk. Petitioner has every incentive to show up to his immigration court
9 proceedings as he is eligible for relief from removal through his pending I-589
10 asylum application. In contrast to the enormous interest at stake for the Petitioner,
11 the government's interest is miniscule. On balance, the *Matthews v. Eldridge* factors
12 weigh heavily in favor of the Petitioner.

13 43. Petitioner's due process right is violated by keeping him in detention
14 for an unnecessary period as it deprives him of fundamental fairness in his removal
15 proceedings. Despite the Immigration Judge finding that Petitioner is not a flight risk
16 or a danger to the community, Petitioner cannot be released while the emergency
17 stay is in effect. This prolonged detention in Otay Mesa Detention Center located in
18 San Diego, California deprives Petitioner of easy access to his counsel, which poses
19 many challenges to his pursuit of relief from removal under his asylum application.

20 44. The regulation permitting the stay effectively promulgates prolonged
21 detention even when an immigration judge has issued bond, which essentially
22 deprives the Petitioner of an actual or meaningful bond hearing, as the judge's
23 decision cannot actually go into effect. The automatic stay effectively renders the
24 Immigration Judge's bond decision as an "empty gesture." *Ashley v. Ridge*, 288
25 F.Supp.2d 662, 669 (D.N.J. 2003), as it essentially removes all the legal authority of
26 the Immigration Judge to redetermine bond and unlawfully gives it to the DHS.

27 45. While the Immigration Judge is correct that the petitioner is eligible for
28 bond, the DHS is continuing the detention in error on the mistaken belief that persons

1 who entered without inspection are not eligible for bond. This argument is a
2 dangerous misreading of the INA and immediate clarification from a federal court
3 is needed that they are wrong. Under INA § 236(a), ICE “may” detain an alien
4 pending the removal proceedings, or release the alien on bond or the alien’s own
5 recognizance. If ICE decides to maintain custody, the alien may request review of
6 ICE’s custody determination at a bond hearing before an Immigration Judge.

7 46. Without federal court action, Petitioner will likely continue to remain
8 detained for months, despite the Immigration Judge’s order releasing him. Given
9 that as of June 30, 2025, the BIA had over 186,000 appeals cases pending in relation
10 to seventeen members and one vacancy on the BIA (twelve permanent members,
11 five temporary members, and one vacancy) immediate action from this court is
12 required to prevent Petitioner’s continued prolonged and unjustified detention.
13 *Executive Office for Immigration Review Adjudication Statistics*, U.S. DEP’T OF
14 JUSTICE, <https://www.justice.gov/eoir/media/1344986/dl?inline> (last updated July
15 31, 2025); Board of Immigration Appeals, U.S. DEP’T OF JUSTICE,
16 <https://www.justice.gov/eoir/board-of-immigration-appeals> (last updated Sept. 18,
17 2025).

18 COUNT TWO

19 **Violation of 8 U.S.C. § 1226(a) and Implementing Regulations**

20 47. Petitioner alleges and incorporates by reference paragraphs 1 through
21 46 above.

22 48. The automatic stay is ultra vires in that it exceeds the authority that
23 Congress conferred upon the DHS and unlawfully removes the authority from the
24 immigration judge to determine bond eligibility. The Immigration Judge exercised
25 his discretion pursuant to the authority granted to him as an appointee of the attorney
26 General, and the automatic stay renders this authority a nullity.

27 49. While the Immigration Judge is correct that the petitioner is eligible for
28 bond, the DHS continues the detention in error on the mistaken belief that persons

1 who entered without inspection are not eligible for bond. This argument is a
2 dangerous misreading of the INA and immediate clarification from a federal court
3 is needed that they are wrong.

4 50. Petitioner's continued detention violates the Immigration and
5 Nationality Act and the U.S. Constitution.

6 **COUNT THREE**

7 51. If he prevails, Petitioner requests attorney's fees and costs under the
8 Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412.

9 **PRAYER FOR RELIEF**

10 WHEREFORE, Petitioner respectfully requests that this Court grant the following
11 relief:

- 12 1. Assume jurisdiction over this matter;
- 13 2. Issue an order directing Respondents to show cause why the writ
14 should not be granted;
- 15 3. Issue a writ of habeas corpus ordering Respondents to release
16 Mr. Pina Aranda on his own recognizance or under parole, a low bond or
17 reasonable conditions of supervision show;
- 18 4. Award Petitioner reasonable costs and attorney's fees; and
- 19 5. Grant any other relief which this Court deems just and proper.

20
21 DATED: March 16, 2026

Respectfully submitted,

22 MCGUIREWOODS LLP

23 /s/ Aria Hangval

24 Robert F. Redmond, Jr. (*Pro Hac Vice Filed*)

Aria Hangval

25 Pro Bono Counsel for Respondent

26 McGuireWoods LLP
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1 **VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

2 I represent Petitioner, Dennis Jose Pina Aranda, and submit this verification
3 on his behalf. I hereby verify that the factual statements made in the foregoing
4 Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

5 Dated this 16th day of March, 2026

6
7 /s/ Robert F. Redmond, Jr.

8 Robert F. Redmond, Jr. (*Pro Hac Vice Filed*)
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CERTIFICATE OF SERVICE

I hereby certify that on **March 16, 2026**, I electronically filed the foregoing Petition for Writ of Habeas Corpus with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all registered participants.

I further certify that a copy of the foregoing document was sent on the following by U.S. Mail on this same date:

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San Diego, CA 92101

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Office of the Chief Counsel

Patrick Divver (Field Office Director of San Diego Office of
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880 Front Street, Room 6253
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Todd M. Lyons (Acting Director of Immigration and Customs
Enforcement)
880 Front Street, Room 2241
San Diego, CA 92101

Kristi Noem (Secretary, U.S. Department of Homeland Security)
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1 Christopher LaRose (Senior Warden, Otay Mesa Detention Center)
2 7488 Calzada De La Fuente
3 San Diego, CA 92154

4 Otay Mesa Detention Center
5 7488 Calzada De La Fuente
6 San Diego, CA 92154

7 I declare under penalty of perjury that the foregoing is true and correct.

8 By: /s/ Aria Hangval
9 Aria Hangval
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