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8 Attorneys for Mr. Arciniegas Carrillo

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 10  
 11 UNITED STATES DISTRICT COURT  
 12 FOR THE SOUTHERN DISTRICT OF CALIFORNIA

13 '26CV2719 JLS BJW

<p>14 YONATHAN ANTONIO          15 ARCINIEGAS CARRILLO,</p>	<p><b>VERIFIED EMERGENCY          PETITION FOR A WRIT OF          HABEAS CORPUS, ORDER TO          SHOW CAUSE WITHIN THREE          DAYS, AND COMPLAINT FOR          DECLARATORY RELIEF</b></p>
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16 *Petitioner,*

17 v.

18 JEREMY CASEY, Facility  
 19 administrator at the Imperial  
 20 Regional Detention Facility,  
 21 PATRICK DIVVER, Director of the  
 22 U.S. Immigration and Customs  
 23 Enforcement San Diego Field  
 24 Office, TODD LYONS, acting  
 25 Director of U.S. Immigration and  
 26 Customs Enforcement,  
 27 MARKWAYNE MULLIN,  
 28 Secretary of the U.S.  
 Department of Homeland  
 Security, and TODD BLANCHE,  
 Acting U.S. Attorney General.



1 via this Petition. *See Ramirez-Bibiano v. LaRose*, No. 25-CV-3429-JLS (SBC), 2025  
2 WL 3632748, at \*4–5 (S.D. Cal. Dec. 15, 2025) (ordering immediate release subject  
3 to conditions of petitioner’s preexisting parole where DHS had summarily revoked  
4 parole and re-detained without notice or a hearing); *see also Maceo-Aguilera v.*  
5 *LaRose*, 26-CV-532-LL-MSB, 2026 WL 381633 (S.D. Cal. Feb. 11, 2026).

6  
7 **JURISDICTION AND VENUE**

8 8. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28  
9 U.S.C. § 1331 (federal question), 28 U.S.C. § 1651 (All Writs Act), 28 U.S.C. §§  
10 2201-02 (declaratory relief), and art. I sec. 9, cl. 2 of the United States Constitution  
11 (Suspension Clause), as Petitioner is presently in custody under the authority of the  
12 United States and challenges his detention as in violation of the Constitution, laws,  
13 or treaties of the United States.

14 9. The federal district courts have jurisdiction under Section 2241 to hear  
15 habeas claims by individuals challenging the lawfulness of their detention by ICE.  
16 *See Jennings v. Rodriguez*, 583 U.S. 281, 290-92 (2018).

17 10. Venue is proper in the Southern District of California, pursuant to 28  
18 U.S.C. §§ 1391 and 2241(d) because Mr. Arciniegas Carrillo is detained at the  
19 Imperial Regional Detention Facility in Calexico, California.

20 **REQUIREMENTS OF 28 U.S.C. § 2243 (IMMEDIATE ISSUANCE OF**  
21 **WRIT OF HABEAS CORPUS OR OSC THEREON)**

22 11. The Court must grant the petition for writ of habeas corpus or issue an  
23 order to show cause (“OSC”) to the respondents “forthwith,” unless the petitioner is  
24 not entitled to relief. 28 U.S.C. § 2243. If an OSC is issued, the Court must require  
25 respondents to file a return “within three days unless for good cause additional time,  
26 not exceeding twenty days is allowed.” *Id.*



1 the implementation and enforcement of the immigration laws. As such, Mr. Mullin  
2 is the ultimate legal custodian of Mr. Arciniegas Carrillo. He is sued in his official  
3 capacity.

4 18. Respondent Todd Blanche is the Acting Attorney General of the United  
5 States and head of the Department of Justice, which encompasses the Board of  
6 Immigration Appeals and the Immigration Courts. Mr. Blanche shares responsibility  
7 for implementation and enforcement of the immigration laws with Respondent  
8 Mullin. Mr. Blanche is a legal custodian of Mr. Arciniegas Carrillo. He is sued in his  
9 official capacity.

10 **STATEMENT OF FACTS**

11 19. Mr. Arciniegas Carrillo came to the U.S. seeking asylum. He applied  
12 through CBP One and was paroled into the United States through the Nogales,  
13 Arizona Port of Entry on March 21, 2024. Ex. A. CBP One is a mobile application  
14 through which noncitizens could request an appointment to present themselves at  
15 designated ports of entry to apply for asylum.

16 20. Mr. Arciniegas Carrillo fled Venezuela after being threatened by an  
17 armed group [REDACTED] At the  
18 beginning of 2023, he participated in peaceful protests against the government which  
19 provoked threats from [REDACTED] They wrote threats on the walls of his house,  
20 urging him to leave, and warning him they would kill him if he returned. He came  
21 to the United States in search of safety and a chance at a future. He fears that he will  
22 be harmed or killed if he returns to Venezuela. *Id.*

23 21. Petitioner was issued a Notice to Appear (NTA) on March 21, 2024,  
24 charging him with being subject to removal as an arriving alien. Ex. A. He was given  
25 an immigration court date of September 11, 2025. *Id.* His next court date is May 13,  
26 2026.

27 22. Mr. Arciniegas Carrillo applied for asylum and withholding of removal,  
28 on March 12, 2025. Ex. C.



1 v. *Eldridge*, 424 U.S. at 335. In applying these factors specifically to the context of a  
2 person challenging immigration detention, courts assess: (1) the petitioner’s liberty  
3 interest in remaining out of custody; (2) the risk of erroneous deprivation of that  
4 interest in remaining out of custody; and (3) the government’s interest in detaining  
5 the petitioner without affording pre-deprivation notice, reasoning, and a hearing.  
6 *Ramirez-Bibiano*, 2025 WL 3632748 at \*4–5.

7       A.     Summary Parole Revocation and Re-Detainment of a Previously  
8             Paroled Person is a Violation of Due Process Requiring Immediate  
9             Habeas Relief.

10       28.    Consistent with the traditional *Mathews* three-factor test, district courts  
11 in the Ninth Circuit have formulated a bright-line Due Process rule: if a noncitizen  
12 has been paroled into the U.S., the government may not revoke their parole or re-  
13 detain them without first affording pre-deprivation notice and a hearing establishing  
14 that the person is now a danger or flight risk—failure to provide this is a violation of  
15 the person’s Fifth Amendment Due Process rights requiring immediate habeas relief.  
16 *See, e.g., Ramirez-Bibiano*, 2025 WL 3632748 (ordering immediate habeas relief;  
17 holding the government’s summary revocation of parole and re-detention without  
18 pre-deprivation notice or a hearing establishing present risk of danger or flight  
19 violates Fifth Amendment Due Process); *see also Noori v. LaRose*, No. 25-CV-1824-  
20 GPC-MSB, 2025 WL 2800149 (S.D. Cal. Oct. 1, 2025) (Curiel, J.) (granting  
21 immediate habeas release; holding the government’s summary revocation of parole  
22 and re-detention without pre-deprivation notice, reasons, and a hearing establishing  
23 present danger or flight risk violated due process under *Mathews*); *Ramirez Tesara*  
24 v. *Wamsley*, 800 F. Supp. 3d 1130 1135–39 (W.D. Wash. 2025) (granting TRO and  
25 ordering immediate release; applying *Mathews* to hold that even though petitioner’s  
26 parole had expired, because he had previously been paroled his re-detention without  
27 a pre-deprivation hearing establishing a justification for re-detention violated due  
28 process under *Mathews*); *Fernandez Lopez v. Wofford*, No. 1:25-CV-01226-KES-

1 SKO (HC), 2025 WL 2959319, at \*6 (E.D. Cal. Oct. 17, 2025) (ordering immediate  
2 habeas release; canvassing seven cases establishing the principle that re-detention of  
3 a previously paroled noncitizen without a pre-deprivation hearing establishing a  
4 change in the person's risk of danger or flight violates Due Process and requires  
5 immediate habeas relief).

6 29. In *Ramirez-Bibiano*, a case from this district, a noncitizen who had been  
7 previously paroled into the U.S. was summarily re-detained after ICE revoked his  
8 parole without notice, reasons, or an opportunity to be heard. *Ramirez-Bibiano*, 2025  
9 WL 3632748 at \*1, \*4–5. The Court applied *Mathews*, granted immediate habeas  
10 relief and attorneys' fees according to proof, and ordered that any future detention be  
11 supported at a hearing with the government bearing the burden to show by clear and  
12 convincing evidence that the petitioner was a present danger or flight risk. *Id.* at \*4–  
13 5; *see also Maceo-Aguilera*, 26-CV-532-LL-MSB, 2026 WL 381633 (S.D. Cal. Feb.  
14 11, 2026); *Alegria Palma v. LaRose et al.*, No. 25-CV-1942-BJC (MMP), (S.D. Cal.  
15 Aug. 11, 2025); *Navarro Sanchez v. LaRose*, 2025 No. 25-CV-2396-JES-MMP, 2026  
16 WL 2770629 (S.D. Cal. Sept. 26, 2025).

17 30. In *Noori* (S.D. Cal.), an Afghan national paroled into the U.S. after  
18 assisting U.S. forces was arrested at a courthouse and re-detained following the  
19 government's summary revocation of his humanitarian parole, without any pre-  
20 deprivation notice, reasons provided, or opportunity to be heard, despite a clean  
21 record and consistent compliance. *Noori*, 2025 WL 2800149 at \*1–2. The Court held  
22 that the government's summary parole revocation and re-detention violated due  
23 process under *Mathews* given the lack of justification, notice, and an opportunity to  
24 be heard. *Id.* at \*9–12. The Court granted the habeas petition, ordered that the  
25 government shall not re-detain the petitioner during the pendency of his removal  
26 proceedings, and granted attorneys' fees according to proof. *Id.* at \*14.

27 31. In *Ramirez Tesara*, a Venezuelan asylum-seeker who had been paroled  
28 into the U.S. was re-detained as he appeared for a monitoring appointing, without

1 any pre-deprivation notice or hearing. 800 F. Supp. 3d at 1134. That court assessed  
2 the petitioner's due process habeas claim under *Mathews* and concluded that because  
3 he had been previously paroled, ICE could only have re-detained the petitioner after  
4 a hearing before an immigration judge at which the government met its burden to  
5 justify detention. *Id.* at 1135–38. ICE's summary re-detention therefore violated Due  
6 Process and required the petitioner's immediate release. *Id.* at 1138–39.

7 32. In *Fernandez Lopez*, an asylum-seeker from Chile who had been paroled  
8 in 2021 was summarily re-detained by ICE in August 2025 after a credible-fear  
9 interview. 2025 WL 2959319 at \*1. Once again, applying *Mathews*, and for the same  
10 reasons as the courts in *Ramirez-Bibiano*, *Ramirez Tesara*, and *Noori*, that court  
11 granted a preliminary injunction as well as the habeas petition at issue, and enjoined  
12 the government from re-detaining the petitioner absent a pre-deprivation bond  
13 hearing at which the government must prove current danger or flight risk by clear  
14 and convincing evidence. *Id.* at \*5–8. That court also canvassed cases from other  
15 district courts in the Ninth Circuit to state the *Mathews*-derived rule that if the  
16 government has previously paroled a noncitizen, it may not re-detain that person  
17 without first providing pre-deprivation notice and a hearing through which the  
18 government establishes a change in the person's risk of danger or flight. *Id.* at \*6.  
19 Failure to provide this pre-deprivation process is a violation of the person's Fifth  
20 Amendment Due Process rights and grounds for immediate habeas relief. *Id.* at \*6–  
21 8.

22 33. Taken together, the district courts of the Ninth Circuit have developed  
23 the bright-line rule that **if a noncitizen has been paroled into the U.S., the**  
24 **government may not revoke that person's parole or re-detain them without first**  
25 **providing pre-deprivation notice and a hearing establishing a change in danger**  
26 **or flight risk by clear and convincing evidence.** To date, the courts to have  
27 considered habeas petitions in this context have each applied the three-factor  
28 *Mathews* test to reach what has now coalesced into a uniform rule of law. The above

1 rule incorporates and relies upon a *Mathews* analysis but streamlines the statement  
2 of law so as not to require a step-by-step in-depth inquiry of each *Mathews* factor.

3 34. This rule is grounded in the acknowledgment that the government’s  
4 initial decision to grant parole “reflects a determination by the government that the  
5 noncitizen is not a danger to the community or a flight risk.” *Fernández López*, 2025  
6 WL 2959319 at \*2. Absent “evidence that the noncitizen is in fact dangerous or has  
7 become a flight risk,” “there is no evidence that these findings have changed” and  
8 there is therefore no justification for re-detention. *Ramirez-Bibiano*, 2025 WL  
9 3632748 at \*4. Without establishing a change in circumstances via notice, a hearing,  
10 and evidence, parole-revocation or re-detention of a previously paroled person  
11 violates Fifth Amendment Due Process. *See id.*

12 35. Accordingly, where the Court finds that a petitioner has been previously  
13 paroled and yet the government summarily revoked his parole or re-detained him, a  
14 step-by-step *Mathews* analysis is unnecessary; it is already incorporated into and  
15 performed by the bright-line rule established by *Ramirez-Bibiano*, *Ramirez Tesara*,  
16 *Fernández López* and the many district court cases it cites, and *Mathews*.

17 36. Here, consistent with this line of cases, because Petitioner had  
18 previously been paroled into the U.S., the government’s summary parole-revocation  
19 and re-detention of him violated his Due Process Rights and he must therefore be  
20 immediately released pursuant to a writ of habeas corpus.

21 37. The Court should also reject any jurisdictional defenses the government  
22 may assert under 8 U.S.C. §§ 1252(g) and (b)(9), because this challenge does not  
23 seek review of any removal order and instead challenges re-detention. *Ramirez-*  
24 *Bibiano*, 2025 WL 3632748 at \*2–3 (rejecting the government’s challenges under 8  
25 U.S.C. §§ 1252(g) and (b)(9) to habeas jurisdiction); *Noori*, 2025 WL 2800149 at  
26 \*6–7 (same). The Court also should waive any exhaustion requirement as futile for  
27 the same reasons it did so in *Ramirez-Bibiano*. 2025 WL 3632748 at \*3 (recognizing  
28 the Southern District of California finds exhaustion to be futile in this context such

1 that immediate judicial review of habeas petitions challenging parole-revocation and  
2 re-detention is required). *Id.* at \*2–3.

3 **B. The Mathews Test Also Requires Petitioner’s Immediate Release.**

4 38. To the extent the Court finds it necessary to undertake the *Mathews* test  
5 step by step, each *Mathews* factor weighs in favor of Petitioner and the result is the  
6 same as if the Court were to apply the aforementioned *Mathews*-based brightline rule.

7 **1. *Mathews* Factor 1: Mr. Arciniegas Carrillo possesses a**  
8 **protected liberty interest in remaining out of custody.**

9 39. Mr. Arciniegas Carrillo possesses a protected liberty interest in  
10 remaining out of custody, namely, “the most significant liberty interest there is – the  
11 interest in being free from imprisonment.” *Velasco Lopez v. Decker*, 978 F.3d 842,  
12 851 (2d Cir. 2020). “Freedom from imprisonment—from government custody,  
13 detention, or other forms of physical restraint—lies at the heart of the liberty [the Due  
14 Process Clause] protects.” *Zadvydas*, 533 U.S. at 690. While “the initial decision to  
15 detain or release an individual may be within the government’s discretion, the  
16 government’s decision to release an individual from custody creates ‘an implicit  
17 promise,’ upon which that individual may rely, that their liberty ‘will be revoked only  
18 if they fail to live up to the...conditions of release.” *Pinchi v. Noem*, 792 F.Supp.3d  
19 1025, 1032 (N.D. Cal. 2025) (alternation marks omitted).

20 40. Here, as in *Ramirez-Bibiano*, Petitioner has a significant liberty interest  
21 in remaining free of ICE custody under prior parole conditions. His initial “release  
22 from ICE custody constituted an implied promise that [his] liberty would not be  
23 revoked unless [he] failed to live up to the conditions of [his] release.” *Pinchi*, 792  
24 F. Supp. 3d at 1034 (internal quotation marks omitted). In other words, petitioner  
25 gained a protected liberty interest in remaining out of custody absent a showing that  
26 he is a flight risk or a danger to the community. *See, e.g., Fernández López*, 2025  
27 WL 2959319 at \*4-5 (finding that petitioner released from immigration detention on  
28 parole had protected liberty interest in remaining out of custody, including if the

1 authority for petitioner’s parole was § 1182(d)(5)(A)); *Noori v. Larose*, 2025 WL  
2 2800149, \*4, 9-10 (S.D. Cal. 2025) (Curiel, J.) (finding that petitioner who was  
3 paroled from immigration detention under § 1182(d)(5)(A) had protected liberty  
4 interest in remaining out of custody).

5 **2. Mathews Factor 2: The Risk of Erroneous Deprivation Here**  
6 **Under the Procedure Used, Namely No Procedure at All, is**  
7 **High.**

8 41. Here, as in *Ramirez-Bibiano*, “the risk of an erroneous deprivation of  
9 such interest is high as Petitioner’s parole was revoked without providing him a  
10 reason for revocation or giving him an opportunity to be heard.” 2025 WL 3632748  
11 at \*4. The inquiry on the second factor may rightfully end there, as Mr. Arciniegas  
12 Carrillo’s parole was revoked, and he was detained without any prior notice,  
13 reasoning, or hearing. *See Ramirez Tesara*, 800 F. Supp. 3d at 1137 (granting habeas  
14 petition and TRO under similar circumstances because “re-detainment without a  
15 hearing results in a risk of erroneous deprivation of [a] protected interest.”);  
16 *Rodriguez Cabrera v. Mattos*, No. 2:25-CV-01551-RFB-EJY, 2025 WL 3072687, at  
17 \*12–13 (D. Nev. Nov. 3, 2025) (noting the government’s arbitrary re-detention  
18 “creates an extreme risk of erroneous deprivation).

19 **3. Mathews Factor 3: The Government’s Interest and the**  
20 **Burdens of Additional Process.**

21 42. Under *Mathews*, the third factor examines the Government’s interests,  
22 including the function at issue and the administrative burdens of additional  
23 procedures. Here, the relevant function is DHS’s administration of immigration  
24 parole and civil detention to ensure appearance at proceedings and protect public  
25 safety. Minimal procedural safeguards-notice of the reasons for revocation and a  
26 prompt opportunity to be heard before a neutral decisionmaker-impose little burden  
27 on that function. They rely on processes the Government already uses in custody  
28 determinations and post-parole supervision, and they enhance accuracy without  
materially impeding enforcement. *See Mathews*, 424 U.S. at 335.



1 paragraph (a) of this section, neither humanitarian reasons nor public benefit warrants  
2 the continued presence of the alien in the United States.”

3 49. There is no evidence that any official found that humanitarian reasons  
4 do not warrant Petitioner’s presence in the United States.

5 50. 8 C.F.R. §212.5(e)(2) also requires that DHS provide Petitioner with  
6 notice prior to revocation of parole. Mr. Arciniegas Carrillo was never provided  
7 notice that the Department sought to terminate parole.

8 51. Petitioner is not a flight risk nor a danger to the public.

9 52. An agency’s failure to follow its regulations that are meant to protect  
10 fundamental rights is a violation of due process. *Accardi v. Shaughnessy*, 347 U.S.  
11 260, 267, 74 S.Ct. 499, 98 L.Ed. 681 (1954); *Sameena Inc. v. U.S. Air Force*, 147  
12 F.3d 1148, 1153 (9th Cir. 1998).

13 53. The arrest of Petitioner terminated his release on parole and violated the  
14 regulations and due process. *Bostock*, 792 F. Supp. 3d at 1145.

15  
16 **COUNT THREE**

17 **VIOLATION OF DUE PROCESS**  
18 **REVOCATION OF PAROLE WITHOUT NOTICE**

19 54. Petitioner re-alleges and incorporates by reference each allegation  
20 contained above.

21 55. The Due Process Clause of the Fifth Amendment forbids the  
22 government from depriving any person of liberty without due process of law. U.S.  
23 Const. amend. V. “Freedom from imprisonment—from government custody,  
24 detention, or other forms of physical restraint—lies at the heart of the liberty” that  
25 the Due Process Clause protects. *Zadvydas*, 533 U.S. at 690 (citing *Foucha v.*  
26 *Louisiana*, 504 U.S. 71, 80 (1992)).

27 56. An individual released from immigration custody has a constitutionally  
28 protected liberty interest in remaining free from detention. *Morrissey v. Brewer*, 408

1 U.S. 471, 482, 92 S. Ct. 2593, 2601, 33 L. Ed. 2d 484 (1972); *see also Sanchez v.*  
2 *LaRose*, 25-cv-2396; 2025 WL 2770629, at \* 3 (S.D. Cal.). Thus, Petitioner has a  
3 fundamental interest in liberty and being free from official restraint.

4 57. The liberty interest applies to individuals who are paroled into the  
5 United States and released to attend removal proceedings. *Garcia v. Andrews*, No.  
6 1:25-CV- 01006 JLT SAB, 2025 WL 2420068, at \*11 (E.D. Cal. Aug. 21, 2025);  
7 *Valencia Zapata v. Kaiser*, No. 25-CV-07492-RFL, 2025 WL 2578207, at \*3 (N.D.  
8 Cal. Sept. 5, 2025); *Y-Z-L-H v. Bostock*, No. 3:25-CV-965-SI, 2025 WL 1898025, at  
9 \*13 (D. Or. July 9, 2025).

10 58. While DHS has discretion to revoke parole, it may not do so in a manner  
11 that is inconsistent with constitutional protections.

12 59. Due process requires notice before Petitioner is detained by immigration  
13 authorities. *Mullane v. Cent. Hanover Bank & Tr. Co.*, 339 U.S. 306, 320, 70 S. Ct.  
14 652, 660, 94 L. Ed. 865 (1950); *Ramirez-Bibiano*, 2025 WL 3632748, at \*3; *Ramirez*  
15 *Tesara*, 800 F. Supp. 3d at 1135; *Fernandez Lopez v. Wofford*, 2025 WL 2959319,  
16 at \*3.

## 17 COUNT FOUR

### 18 VIOLATION OF DUE PROCESS

#### 19 REVOCATION OF PAROLE WITHOUT NEUTRAL DECISIONMAKER

20  
21 60. Petitioner re-alleges and incorporates by reference each allegation  
22 contained above.

23 61. Under the Due Process Clause of the Fifth Amendment to the United  
24 States Constitution, no person shall be “deprived of life, liberty, or property, without  
25 due process of law.” U.S. Const. amend. V. “Freedom from imprisonment— from  
26 government custody, detention, or other forms of physical restraint—lies at the heart  
27 of the liberty that Clause protects.” *Zadvydas*, 533 U.S. at 690.

28 62. An individual released from immigration custody has a liberty interest

1 in remaining free from detention. *Morrissey*, 408 U.S. at 482.

2 63. The liberty interest applies to individuals who are paroled into the  
3 United States and released to attend removal proceedings. *Garcia v. Andrews*, No.  
4 1:25-CV- 01006 JLT SAB, 2025 WL 2420068, at \*11 (E.D. Cal. Aug. 21, 2025);  
5 *Valencia Zapata v. Kaiser*, No. 25-CV-07492-RFL, 2025 WL 2578207, at \*3 (N.D.  
6 Cal. Sept. 5, 2025); *Bostock*, No. 3:25-CV-965-SI, 2025 WL 1898025, at \*13 (D. Or.  
7 July 9, 2025).

8 64. While DHS has discretion to revoke parole, it may not do so in a manner  
9 that is inconsistent with constitutional protections.

10 65. Due Process requires that Petitioner be afforded a bond determination  
11 before a neutral adjudicator if the government is to re-detain Petitioner. *Mathews v.*  
12 *Eldridge*, 424 U.S. 319 (1976); *Ramirez-Bibiano*, 2025 WL 3632748, at \*5; *Ramirez*  
13 *Tesara*, 800 F. Supp. 3d at 1136; *Fernandez Lopez v. Wofford*, 2025 WL 2959319,  
14 at \*7.

#### 15 PRAYER FOR RELIEF

16 Petitioner prays that this Court grant the following relief:

- 17 1. Assume jurisdiction over this matter.
- 18 2. Order that Petitioner shall not be transferred outside the Southern  
19 District of California.
- 20 3. Issue a Writ of Habeas Corpus ordering Respondents to immediately  
21 release Mr. Arciniegas Carrillo under the terms and conditions of his original parole.
- 22 4. Issue an Order to Show Cause why this Petition should not be granted  
23 within three days and set a hearing on this Petition within five days of the return  
24 pursuant to 28 U.S.C. § 2243.
- 25 5. Declare that Petitioner's current detention is unlawful.
- 26 6. Order that Petitioner may not be re-detained absent proper notice of the  
27 reasons that form the basis for revocation of parole.
- 28 7. Order that Petitioner is entitled to a bond hearing before an immigration

1 judge if DHS revokes parole with proper notice.

2 8. Award reasonable attorney’s fees and costs pursuant to the Equal Access  
3 to Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412.

4 9. Grant such further relief as this Court deems just and proper.

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Respectfully submitted,

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Cassandra Lopez

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Litigation Director  
AL OTRO LADO  
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Email: Cassandra.l@alotrolado.org  
Date: April 29, 2026

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**VERIFICATION BY ATTORNEY ACTING ON MR. ARCINIEGAS  
CARRILLO’S BEHALF PURSUANT TO 28 U.S.C. §2242**

I am submitting this verification on behalf of Mr. Arciniegas Carrillo because I am his attorney. As Mr. Arciniegas Carrillo’s attorney, I hereby verify that the factual statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: April 29, 2026

By: /s/ Cassandra Lopez