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8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10

11 MACVIL AJEIWEH SEMEN,

12
13 Petitioner,

14 v.

15 CHRISTOPHER J. LAROSE, Senior
16 Warden, Otay Mesa Detention Center; *et*
17 *al.*,

18 Respondents.
19

Case No. 26-cv-02784-JO-MMP

**RESPONDENTS' SUPPLEMENTAL
BRIEFING RE: ORDER ECF NO. 6**

20 Pursuant to the Court's June 2, 2026 Order directing "Respondents to file
21 supplemental briefing by June 9, 2026 identifying and addressing any individualized
22 concerns regarding Petitioner's danger to the community or flight risk, including the
23 factual basis for any such concerns" (ECF No. 6), Respondents submit the following
24 information for the Court's consideration.

25 Petitioner was detained for unlawful entry when he entered the United States
26 without inspection by an immigration officer and not at a designated port of entry. *See*
27 ECF No. 4-1 (Form I-213). At the time he was detained, Petitioner had no valid
28 documents permitting him to enter the United States. In fact, Petitioner had no valid

1 travel documents, such as a passport, despite travelling all the way from Cameroon.
 2 Petitioner does not have any connection to the United States. He has no family ties to
 3 the United States, has never resided in the United States, and has not identified a fixed
 4 residence to which he can reside, and by extension, where he could be located at further
 5 immigration proceedings. Petitioner also has no record of employment in the United
 6 States. Within Petitioner's removal proceedings, Petitioner submitted as evidence a
 7 police document alleging Petitioner is wanted in Cameroon for aiding and abetting
 8 terrorism, secession, and hostilities against the fatherland.¹ On June 4, 2026, an
 9 immigration judge, weighing the appropriate factors, denied Petitioner's applications
 10 for relief from removal and ordered Petitioner removed to Cameroon, his home country.
 11 *See* Exhibit 1 (Order of the Immigration Judge). Petitioner reserved appeal and has until
 12 July 6, 2026 to perfect that appeal before the Board of Immigration Appeals (BIA). *See*
 13 *id.*

14 Respondents' position is that the Court should deny Petitioner's habeas petition,
 15 for the reasons stated in their Return. *See* ECF No. 4. However, Respondents do not
 16 oppose an order requiring Respondents to provide Petitioner with a bond hearing before
 17 an immigration judge, where the Department of Homeland Security (DHS) would bear
 18 the burden of proof establishing, by clear and convincing evidence, that Petitioner poses
 19 a danger to the community or a risk of flight.

20 Dated: June 8, 2026

Respectfully submitted,

ADAM GORDON
 United States Attorney

s/ Camille Savedra
 CAMILLE SAVEDRA
 Assistant United States Attorney
 Attorneys for Respondents

25 ¹ It is undersigned's understanding that Petitioner submitted the document but did not
 26 provide a certification that verifies the authenticity of the document. Cameroon allows
 27 its citizens to obtain a certification of non-conviction that states that police record, court
 28 convictions, and prison records of a subject individual:
<https://travel.state.gov/content/travel/en/us-visas/Visa-Reciprocity-and-Civil-Documents-by-Country/Cameroon.html>. The document was part of the evidence
 considered by the immigration judge during Petitioner's merits hearing.