

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

'26 CV3690 RSH AHG

Jairon Enrique Borjas-Castillo

Petitioner,

v.

**INJUNCTIVE RELIEF
TEMPORARY RESTRAINING ORDER**

Todd Blanche, U.S. Attorney General,
Markwayne Mullin, Secretary of DHS,
Todd Lyons, Director of ICE,
Christopher LaRose Warden of Otay Mesa Detention Center
Respondent's

**MOTION FOR TEMPORARY RESTRAINING ORDER,
AND
INJUNCTIVE RELIEF**

TEMPORARY RESTRAINING ORDER

Petitioner-Plaintiff, Jairon Enrique Borjas-Castillo moves this court ex parte for a Temporary Restraining Order that would among other things, require his immediate release from his ongoing detention by agents of Immigration and Customs Enforcement (ICE) and prohibit his re-arrest without pre-detention hearing before an "IJ" Immigration Judge at which ICE establishes by clear convincing evidence that his detention is necessary to prevent his flight risk or protect the public.

Background :

The evidence before this court establishes that Jairon Enrique Borjas-Castillo is a 36-year old from Honduras who entered the United States on 11-30-2020 fleeing from extortion in his own country. Petitioner also is fleeing [REDACTED]

[REDACTED] Once in the United States. Petitioner began working in construction to maintain his household. On year 2021 Petitioner got involve with his current partner and they moved in together which made Petitioner's obligations grater. Petitioner on [REDACTED] had his son a U.S.C by name [REDACTED] Petitioner has two arrest on 2024, and another on 2025. Petitioner shows with proof to this court that all requirements have been met. Once out from custody from the San Diego County Jail Petitioner began working every day as usual and on 11-8-2025 ICE arrested Petitioner while heading to work. Petitioner was inside of a 7 Eleven when ICE took him into custody illegally because ICE had no arrest warrant. Once in detention Petitioner hired a private attorney Carlos Valdez who filed a Habeas Corpus on his behalf. The said attorney only damaged Petitioner on his case as well hi Habeas Corpus. Attorney Carlos Valdez never advised Petitioner of the importance and need to appeal to the BIA the denial of Petitioner's Bond which took place on his own. Attorney Carlos Valdez never explained anything to Petitioner. There

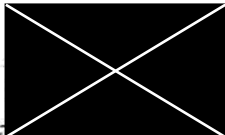
is an active Law Suit against attorney Carlos Valdez in the Bar Association for administrative negligence and ineffective assistance of counsel. Petitioner does not speak or understand English. The bond hearing was in an immigration court. The bond hearing took place in 1 month into Petitioner's detention. It's been 6 months since the last bond hearing. Petitioner was never visited by attorney regarding his Habeas Corpus. This clearly shows ineffective assistance of counsel and merits for Petitioner to be released immediately. Petitioner was a victim of false representation and loss of money. Attorney Carlos Valdez declined to file an appeal for Jairo to the BIA for the bond denial. Megan Day represented Petitioner on his bond hearing on 12-29-2025 and she as well failed to adequately represent Petitioner. On two occasions Petitioner because of his language barrier has been taken advantage of by private attorney's leaving him exposed to the now broken down Immigration Laws and court process since President Donald J. Trump through the DOJ Department of Justice have fired over 100 Immigration Judge's and replacing them with temporary Military attorney's to serve as Judges who have ZERO knowledge and practice about immigration law violating thousands of detainees Due Process Rights like Mr. Borjas-Castillo. On three occasions attorney Megan Day left Petitioner unrepresented which were on dates 11-20-2025, 12-10-2025, and last on 12-31-2025 leaving Petitioner exposed to an immediate expulsion from the country. Through documents Petitioner shows proof of contract with attorney amongst other documents that show what Petitioner is requesting. Here Petitioner has no Attempt of Escape clearing him from a "Flight Risk" and also has, no Violent or Aggravated Convictions on his criminal history which clears him for the "Danger to the Community". Petitioner here request that this Honorable Court to approve this Habeas Corpus and Temporary Retraining Order since the "IJ" Court Judges are under pressure from the "DOJ" Department of Justice and President Donald J. Trump to deny bonds and Asylum cases. There is evidence that establishes this information that President Donald J. Trump through the "DOJ" has fired over 100 Immigration

Judges over the United States. Donald trump's administration has fired or forced out roughly 100 immigration judge's since the president took office, including more than a dozen in the last two weeks alone. The administration purged at least eight immigration judges from New York city Monday, according to the union that represents them. another five judges in San Francisco were fired last month without explanation. Unlike Federal District courts, Immigration Courts operate under the Department of Justice and at the direction of the Attorney General. Trump's radical overhaul of the nation's immigration system has upended the courts that keep it running to expedite his mass deportation agenda. One of the judges in New York is Amiena khan, the assistant chief immigration judge at 26 federal plaza, a federal complex in Manhattan that houses immigration agencies and courtrooms. the departures have whittled the number of immigration judges down from 715 to roughly 600, marking a 16 percent drop within 11 months. Dozens of the other judges have retired or resigned since the start of the Trump's administration That is why Petitioner request that this Honorable Court through his Habeas Corpus be approved for a Immediate Release. Petitioner request that this court grant the Temporary Restraining Order so Respondent's cannot transfer Petitioner out of the Jurisdiction of the court or from Otay Mesa Detention Center until the Habeas Corpus is adjudicated. My health has worsen because I have developed depression, anxiety, and major stress disorder because of the prolonged detention I have spent in custody and not being able to be by my immediate family. I have not received any incident reports for misbehavior since I have been detained here at Otay Mesa Detention Center and have been in good behavior while in ICE custody. I am requesting for this Temporary Restraining Order to be put in place so ICE won't be able to transfer me or deport me.

CITING CASE LAW: Jose Antonio Ambrocio Garcia case No. 25-cv-03319 (2025)

Carmen Araceli Pablo Sequen Case No. 25-cv-06487
and F.T.C. v. Dean Foods and many more other cases that are
being gathered

Sincerely,



Jairo Enrique Borjas-Castillo

Date: 6-16-2026



Otay Mesa Detention Center
P.O. Box 439049
San Diego, CA 92143