

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

Petitioner:

Larreinaga Chavez Roberto

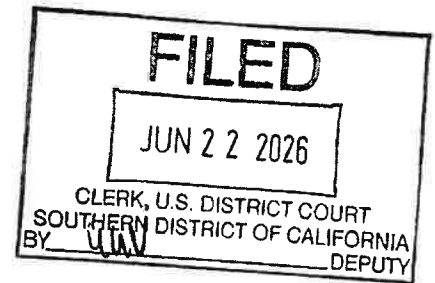


v.

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

Respondent.

Case No.: '26CV3656 BAS BJW



FEDERAL BOND REQUEST COVER LETTER

United States District Court Southern District of California]

RE: Petition for Writ of Habeas Corpus and Request for Release on Bond petition under
28 U.S.C. § 2241

Petitioner: Larreinaga Chavez Roberto

Facility: [Imperial Regional Detention Center

TO THE HONORABLE COURT:

Petitioner, [Full Name], respectfully submits this Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, challenging the legality of continued immigration detention and requesting immediate release under reasonable conditions.

I. INTRODUCTION

This case involves **prolonged and unjustified detention**. The Petitioner has remained in custody for an extended period without a meaningful opportunity for release, despite posing no danger and no flight risk.

II. GROUNDS FOR RELIEF

- **Prolonged Detention:**
Petitioner has been detained for approximately [3 months].
- **Lack of Individualized Review:**
No meaningful custody determination has been provided.
- **Strong Equities:**
Petitioner demonstrates:
 - Family ties in the United States
 - Stable housing
 - Verified sponsor
 - No danger to the community
- **Changed Circumstances (N/A):**
New supporting evidence now exists addressing prior concerns.

III. RELEASE PLAN

Petitioner has a structured and reliable release plan:

- **Sponsor:** [Claudia Sandoval]
- **Address:** [REDACTED] FL. 34972]
- **Relationship:** [Family Acquaintance]

The sponsor affirms:

- Housing will be provided
- Compliance with all court and ICE requirements
- Ongoing supervision and communication

IV. LEGAL BASIS

Under 28 U.S.C. § 2241, this Court has authority to review detention and order release when continued custody is no longer justified.

V. REQUEST FOR RELIEF

Petitioner respectfully requests:

1. Grant the Petition for Writ of Habeas Corpus
2. Order immediate release under reasonable conditions
3. Grant any further relief deemed appropriate

VI. CONCLUSION

Continued detention no longer serves a legitimate purpose.

Petitioner is ready to proceed with immigration proceedings while complying fully with all conditions.

Release is justified and appropriate.

Sig

[REDACTED]

06/17/2026

{Larreina Chavez Roberto [REDACTED]} 1572 Gateway Road Calexico. Ca. 92231

CERTIFICATE OF SERVICE

I, Roberto Larreinaga, certify that on the 17 day of June, 20²⁶, I served a true and correct copy of the following documents:

- Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241
- Motion for Release Pending Adjudication
- Supporting Declarations and Exhibits
- Proposed Order (if applicable)

by depositing the documents in the United States Mail, postage prepaid, addressed to:

United States Attorney's Office

For the United States Attorney serving the federal district where the petition is filed.

ICE Office of Chief Counsel

For the jurisdiction where the detainee is currently detained.

Facility Administrator / Warden

[Detention Facility Name]

[Facility Address]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: 06/17/2026

Signature:

A black rectangular box with a white 'X' drawn across it, used to redact the signature.

Printed Name: Roberto Larreinaga