

U.S. DISTRICT COURT  
DISTRICT OF VERMONT  
FILED

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

2025 JUN 16 PM 4:13

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HEIDI F. PEREZ ALFARO,

Petitioner,

v.

THERESA MESSIER, SUPERINTENDENT,  
CHITTENDEN REGIONAL CORRECTIONAL  
FACILITY – SOUTH BURLINGTON;  
DONALD J. TRUMP, IN HIS OFFICIAL  
CAPACITY AS PRESIDENT OF THE UNITED  
STATES; PATRICIA HYDE, IN HER OFFICIAL  
CAPACITY AS ACTING BOSTON FIELD  
OFFICE DIRECTOR, IMMIGRATION AND  
CUSTOMS ENFORCEMENT, ENFORCEMENT  
AND REMOVAL OPERATIONS; VERMONT  
SUB-OFFICE DIRECTOR OF IMMIGRATION  
AND CUSTOMS ENFORCEMENT,  
ENFORCEMENT AND REMOVAL  
OPERATIONS; TODD M. LYONS, IN HIS  
OFFICIAL CAPACITY AS ACTING DIRECTOR,  
U.S. IMMIGRATION AND CUSTOMS  
ENFORCEMENT; PETE R. FLORES, IN HIS  
OFFICIAL CAPACITY AS ACTING  
COMMISSIONER FOR U.S. CUSTOMS AND  
BORDER PROTECTIONS; KRISTI NOEM, IN  
HER OFFICIAL CAPACITY AS SECRETARY  
OF THE UNITED STATES DEPARTMENT OF  
HOMELAND SECURITY; MARCO RUBIO, IN  
HIS OFFICIAL CAPACITY AS SECRETARY OF  
STATE; AND PAMELA BONDI, IN HER  
OFFICIAL CAPACITY AS U.S. ATTORNEY  
GENERAL,

Respondents.

Case No: 2:25-cv-00584

**ORDER TO SHOW CAUSE**

On June 16, 2025, Petitioner Heidi F. Perez Alfaro filed a petition for writ of habeas corpus and complaint for declaratory and injunctive relief with respect to her


present detention at Chittenden Regional Correctional Facility in South Burlington, Vermont, following a stop of a vehicle in which she was a passenger on June 14, 2025. Petitioner contends that on June 14, 2025, she and her stepfather, Jose Ignacio De La Cruz De La Rosa, were driving on VT Route 104 in Richford, Vermont “to deliver food to several dairy farms in the area” when the vehicle “was pulled over by [U.S. Customs and Border Patrol (“CBP”)] uniformed agents in marked Border Patrol vehicles.” (Doc. 1 at 8.) She alleges she and Mr. De La Cruz De La Rosa “exercised their rights to remain silent and called [the] Migrant Justice emergency hotline.” *Id.* The agents purportedly broke Mr. De La Cruz De La Rosa’s driver’s side window, opened the car door, and detained Petitioner and Mr. De La Cruz De La Rosa. Petitioner asserts that she was “unlawfully arrested without a warrant” by CBP. *Id.* at 2.

Petitioner asserts that she is a citizen of Mexico. In her petition, she states that she “has lived in Vermont and attended school in Vermont since February of 2023.” (Doc. 1 at 5.) She contends that she has acted as an advocate on behalf of Migrant Justice, an organization she claims is dedicated to bettering the lives and working conditions for migrant workers on dairy farms in Vermont. She claims she is being unlawfully detained as the result of an illegal traffic stop and arrest in an effort to punish her for exercising her First Amendment rights.

Pursuant to 28 U.S.C. 2243, a court “entertaining an application for a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto.” Respondents are hereby ORDERED TO SHOW CAUSE on or before June 23, 2025, why a writ of habeas corpus should not be granted. Petitioner may file a reply on or before June 27, 2025. The court shall schedule a hearing promptly thereafter.

SO ORDERED.

Dated at Burlington, in the District of Vermont, this 16<sup>th</sup> day of June, 2025.

  
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Christina Reiss, Chief Judge  
United States District Court