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UNITED STATES DISTRICT COURT
THE DISTRICT OF COLORADO

Civil Action No. 1:26-cv-907

DENIS PINEDA TIJERINO,

Petitioner

v.

JUAN BALTAZAR, Warden of the Denver Contract Detention Facility, Aurora, Colorado, in his official capacity,

ROBERT HAGAN, Field Office Director, Denver Field Office, U.S. Immigration and Customs Enforcement, in his official capacity,

KRISTI NOEM, Secretary, U.S. Department of Homeland Security, in her official capacity,

TODD LYONS, Acting Director of Immigration and Customs Enforcement, in his official capacity,

PAM BONDI, Attorney General, U.S. Department of Justice, in her official capacity,

Respondents

VERIFIED PETITION FOR WRIT OF HABEAS CORPUS

I. INTRODUCTION

1. Respondents' incarceration of Mr. Pineda Tijerino is unlawful. Immigration and Customs Enforcement ("ICE") violated Mr. Pineda Tijerino's right to due process when it ignored its own procedures to jail him. He now seeks redress from this Court to remedy his unlawful loss of liberty.

2. Mr. Pineda Tijerino is a 38 year-old native and citizen of Nicaragua who entered the United States on or about October 20, 2023, fleeing political persecution for opposing the repressive Ortega government. He surrendered to immigration authorities near Eagle Pass, Texas, was given a credible fear interview, and was found to have a credible fear of persecution or torture if returned to Nicaragua. ICE thereafter released him on an order of release on recognizance. He then moved to Longmont, CO and began working as an auto mechanic. Under the conditions of his release, he was required to check-in monthly with ICE in person and to be available for home visits and phone calls. Mr. Pineda Tijerino complied with these conditions in all respects and timely submitted his asylum application.

3. On or about January 20, 2026, Mr. Pineda Tijerino appeared for what he thought was a routine ICE check-in at the ICE substation in Frederick, CO. Instead, he was arrested and thereafter detained at the GEO Aurora ICE Processing Center. As he had not violated the terms of his OSUP, he was unable to understand the reason for his arrest, nor was he given an opportunity to contest his detention. Compounding matters, Mr. Pineda Tijerino had driven his car to the substation, and all his immigration paperwork, including his notice to appear, order of supervision, credible fear

interview transcript, and asylum application, were in the car. Over a month later, he still does not know what has happened to his car and is not possession of any of his immigration paperwork.

4. Mr. Pineda Tijerino, through counsel, respectfully moves the Court for a writ of habeas corpus to remedy the unlawful deprivation of his liberty and enjoin further unlawful incarceration by Respondents.

JURISDICTION

5. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 et. seq.

6. This court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

7. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et. seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et. seq., the All Writs Act, 28 U.S.C. § 1651, and the Immigration and Nationality Act, 8 U.S.C. § 1252(e)(2).

VENUE

8. Venue is proper because Petitioner is in Respondents' custody in Aurora, CO. Venue is further proper because a substantial part of the events or omissions giving rise to Petitioner's claims occurred in this District, where Petitioner is now in Respondent's custody. 28 U.S.C. § 1391(e).

9. For these same reasons, divisional venue is proper under Local Rule 3-2.

REQUIREMENTS OF 28 U.S.C. §§ 2241, 2243

10. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the Respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. §

2243. If an OSC is issued, the Court must require Respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." Id.

11. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most important writ known to the constitutional law of England, affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963).

12. Petitioner is "in custody" for the purpose of § 2241 because Petitioner is arrested and detained by Respondents.

EXHAUSTION

13. Exhaustion is not required because Congress did not codify a requirement that petitioners seeking a writ of habeas corpus exhaust administrative remedies. *McCarthy v. Madigan*, 503 U.S. 140, 144 (1992) ("Where Congress specifically mandates, exhaustion is required… But where Congress has not clearly required exhaustion, sound judicial discretion governs.") (citation omitted).

14. While inapplicable here, some courts require prudential exhaustion of administrative remedies prior to seeking a writ under § 2241. *Baquera v. Longshore*, 948 F. Supp. 2d 1258, 1259 (D. Colo. 2013) (citing *Williams v. O'Brien*, 792 F.2d 986, 987 (10th Cir. 1986) (per curiam)) abrogated on different grounds by *Nielsen v. Preap*, 139 S. Ct. 954 (2019). However, exhaustion of remedies is unnecessary if futile. *Goodwin v. State of Okl.*, 923 F.2d 156, 157 (10th Cir. 1991) (finding that exhaustion is not required due to futility where the state's highest court recently decided the precise legal issue petitioner raised in his federal habeas petition).

15. Here, exhaustion would be futile because, under binding BIA precedent, Petitioner is not entitled to a bond hearing before the immigration court because he was apprehended at the

border and is therefore treated as an arriving alien. *See Matter of Yajure Hurtado,* 29 I&N Dec. 216 (BIA 2025). The recent decision in *Maldonado Bautista v. DHS*, 5:25-cv-01873-SSS-BFM (C.D. Cal., Feb. 18, 2026), vacating in part *Matter of Yajure Hurtado* does not apply to Petitioner, because he is not a *Maldonado* class member given his apprehension at the border.

16. More importantly, a bond hearing would not vindicate Petitioner's APA and due process rights because ICE has not demonstrated, or even attempted to demonstrate, any change in Petitioner's individualized circumstances such that a redetermination of his custody statue—i.e., detainment—is warranted. Such a hearing would unfairly shift the burden to Petitioner and likely, at best, impose an additional unwarranted condition of a monetary bond which he would be unable to pay. In other words, ICE's abuse of discretion here is a threshold issue which relieves Petitioner of the burden to exhaust a "remedy" that does not fit the violation.

PARTIES

17. Petitioner is a 38-year-old native and citizen of Nicaragua. Petitioner is present within the state of Colorado as of the time of the filing of this petition.

18. Respondent Juan Baltazar is the Warden of the Aurora Facility where ICE jails Petitioner, and is an employee of the GEO Group, the for-profit prison company that operates the facility. Mr. Baltazar is a legal custodian of Petitioner. He is sued in his official capacity.

19. Respondent Robert Hagan is the ICE Field Office Director of the Denver ICE Field Office and is sued in his official capacity. Mr. Hagan is the immediate custodian of Petitioner and is responsible for his detention and removal.

20. Kristi Noem is the Secretary of the Department of Homeland Security ("DHS"). Ms. Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act

("INA"). DHS is the parent agency of ICE, and thus Ms. Noem also oversees ICE, which is responsible for Petitioner's illegal detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

21. Respondent Todd M. Lyons is the Acting Director of ICE and is sued in his official capacity. Mr. Lyons is responsible for Petitioner's illegal detention and has custodial authority over him.

22. Respondent Pam Bondi is the Attorney General of the United States. She is responsible for the actions of the Department of Justice ("DOJ"). The Executive Office for Immigration Review ("EOIR") and the immigration court system it operates are a component agency of DOJ. Ms. Bondi is sued in her official capacity.

LEGAL FRAMEWORK

23. Immigration detention should not be used as a punishment and should only be used when, under an individualized determination, a noncitizen is a flight risk because they are unlikely to appear for immigration court or a danger to the community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

24. Noncitizens in immigration proceedings are entitled to Due Process under the Fifth Amendment of the U.S. Constitution. *Reno v. Flores*, 507 U.S. 292, 306 (1993).

25. The Immigration and Nationality Act (INA) establishes various procedures through which individuals may be detained pending a decision on whether the noncitizen is to be removed. 8 U.S.C. § 1226(a).

26. Removal proceedings described in section 240 of the INA are used to determine whether individuals, such as Petitioner, should be removed from the United States. See 8 U.S.C. § 1229a.

27. The Refugee Act of 1980, the cornerstone of the U.S. asylum system, provides a right to apply for asylum to individuals seeking safe haven in the United States. The purpose of the Refugee Act is to enforce the "historic policy of the United States to respond to the urgent needs of persons subject to persecution in their homelands." Refugee Act of 1980, § 101(a), Pub. L. No. 96-212, 94 Stat. 102 (1980).

28. The "motivation for the enactment of the Refugee Act" was the United Nations Protocol Relating to the Status of Refugees, "to which the United States had been bound since 1968." *INS v. Cardoza-Fonseca*, 480 U.S. 421, 424, 432-33 (1987). The Refugee Act reflects a legislative purpose "to give 'statutory meaning to our national commitment to human rights and humanitarian concerns.'" Duran v. INS, 756 F.2d 1338, 1340 n.2 (9th Cir. 1985).

29. The Refugee Act established the right to apply for asylum in the United States and defines the standards for granting asylum. It is codified in various sections of the INA.

30. The INA gives the Attorney General or the Secretary of Homeland Security discretion to grant asylum to noncitizens who satisfy the definition of "refugee." Under that definition, individuals generally are eligible for asylum if they have experienced past persecution or have a well-founded fear of future persecution on account of race, religion, nationality, membership in a particular social group, or political opinion and if they are unable or unwilling to return to and avail themselves of the protection of their homeland because of that persecution of fear. 8 U.S.C. § 1101(a)(42)(A).

31. Although a grant of asylum may be discretionary, the right to apply for asylum is not. The Refugee Act broadly affords a right to apply for asylum to any noncitizen "who is physically present in the United States or who arrives in the United States[.]" 8 U.S.C. § 1158(a)(1).

32. Immigration detention is a form of civil confinement that "constitutes a significant deprivation of liberty that requires due process protection." *Addington v. Texas*, 441 U.S. 418, 4253 (1979).

33. Custody determinations for individuals in 1229a removal proceedings are governed by 8 U.S.C. § 1226. Under § 1226(a), an individual may be released if he does not present a danger to persons or property and is not a flight risk. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Matter of Guerra*, 24 I&N Dec. 37 (BIA 2006).

34. Custody determinations under § 1226(a) are individualized and based on the facts presented in those cases. Unlike § 1226(c), which can provide for categorical determinations for detention regardless of flight risk or safety risks, § 1226(a) requires a case-by-case review of the facts and circumstances.

35. Once a determination to release an individual from custody is made, the release order may be revisited when the facts or circumstances warrant revocation or reconsideration. 8 U.S.C. § 1226(b). For an individual who was once in custody, the Attorney General may take that individual back into custody by revoking the individual's release when the facts and circumstances warrant it.

36. Revocation and return to custody is authorized only based on the individualized facts and circumstances. 8 C.F.R. § 1236.1(c)(9). By regulation, revocation decisions are limited in nature and may only be made by certain authorized officials. 8 C.F.R. § 1236.1(c)(9).

FACTUAL BACKGROUND

37. Petitioner Denis Pineda Tijerino is a 38 year-old native and citizen of Nicaragua who entered the United States on or about October 20, 2023, fleeing political persecution by the repressive Ortega government. *See* Exhs 1 (Form I-862, Notice to Appear) & 2 (Form I-213).

38. Petitioner was targeted because of his opposition to the government; paramilitaries supporting the Ortega regime attacked him with machetes, mutilating his ear. The regime thereafter imprisoned him where he was subject to further torture including beatings, solitary confinement, and being sprayed with a high pressure hose. After getting out of prison, he fled to Costa Rica; however, he was only able to secure temporary permission there, and left the country after about four years, making his way to the United States.

39. Petitioner entered the United States without inspection by crossing the Rio Grande near Eagle Pass, TX, on or about October 20, 2023, and surrendering to immigration authorities. Exhs. 1 & 2. He was given a credible fear interview and was found not to have a credible fear of persecution or torture if returned to Nicaragua. However, upon review of that determination, an immigration judge vacated the asylum officer's decision and the ensuing removal order, finding that Petitioner had in fact established a credible fear of persecution or torture. *See* Exh. 2.

40. On or about November 20, 2023, Respondents initiated removal proceedings against Petitioner under 8 U.S.C. § 1229a. Exh. 1.

41. Respondents alleged that Petitioner was inadmissible to the United States under 8 U.S.C. § 1182(a)(6)(A)(i) and commanded that Petitioner appear for a hearing in immigration court. Exh. 1.

42. On information and belief, based on the individualized facts of Petitioner's case, Respondent DHS released Petitioner from its custody on an Order of Release on Recognizance under 8 U.S.C. § 1226(a).

43. Petitioner then moved to Longmont, CO and began working as an auto mechanic. Under the conditions of release, he was required to check-in monthly with ICE in person and to be available for home visits and phone calls. Petitioner complied with his order of release in all respects and timely submitted his asylum application.

44. On January 20, 2025, President Donald Trump issued several executive actions relating to immigration, including "Protecting the American People Against Invasion," an executive order (EO) setting out a series of interior immigration enforcement actions. The Trump administration, through this and other actions, has outlined sweeping, executive branch-led changes to immigration enforcement policy, establishing a formal framework for mass deportation. The "Protecting the American People Against Invasion" EO instructs the DHS Secretary "to take all appropriate action to enable" ICE, CBP, and USCIS to prioritize civil immigration enforcement procedures including through the use of mass detention.

45. On information and belief, on or about January 20, 2026, Petitioner appeared for what he thought was a routine ICE check-in at the ICE substation in Frederick, CO. Instead, he was arrested and thereafter detained at the GEO Aurora ICE Processing Center. Exh. 3 (Form I-830E, Notice to EOIR). As he had not violated the terms of his release, he was unable to understand the reason for his arrest, nor was he given an opportunity to contest his detention.

46. Compounding matters, Petitioner had driven his car to the substation, and all his immigration paperwork, including his notice to appear, order of supervision, credible fear interview transcript, and asylum application, were in the car.

47. Over a month later, he still does not know what has happened to his car. He still lacks many of his immigration documents and was only able to obtain others when undersigned counsel requested them from the court—a process which itself took two weeks.[1]

48. Petitioner appeared for several court dates before an immigration judge in Aurora. His most recent court date was on February 17, 2026. At this hearing, he explained to the judge that he had no documents because they were all in his car at the time ICE arrested him at his check-in. Neither the court nor ICE counsel provided him with any documents.

49. Petitioner's next hearing is March 23, 2026, but he is unclear about what happened at the prior hearing or what the next steps in his case are.

50. Petitioner fully intends to exercise his appellate rights in the event of any pretermission of his asylum application, if that is in fact what is happening.

51. On information and belief, Respondents have detained Petitioner regardless of the individual facts and circumstances of his case.

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[1] Undersigned counsel notes that he does not represent Mr. Pineda Tijerino before the immigration court. Counsel is the sole legal services employee at a small nonprofit in Longmont, CO; to support as many detained individuals as possible, to the greatest extent possible, in most cases counsel provides support via consultations and limited scope representation rather than formally entering an appearance. The EOIR provides for limited scope representation on applications, briefs, motions, and other documents through the submission of a form EOIR-61, as well as for representation that is limited to bond proceedings. Moreover, EOIR provides for the release of information to third-parties such as attorneys who may be providing consultations or limited-scope representation via the submission of a form EOIR-59. This information is relevant to the instant petition because undersigned counsel submitted an EOIR-59 on February 12, 2026 and repeatedly followed-up, but did not receive any documents until February 25, 2026. Moreover, those documents do not include a copy of the credible fear interview, immigration judge order vacating the negative finding, or order of release.

Additionally, Petitioner does not understand what happened at his prior hearing on February 17, 2026, and does not know what is expected of him at his next hearing on March 23, 2026.

Finally, after a review of Petitioner's asylum application, undersigned counsel discovered that it was prepared by a *notario* who charged Petitioner $700, committed numerous blatant errors, and did not include *any* of Petitioner's account in the application. Petitioner was not aware of this until undersigned counsel brought it to his detention.

52. On information and belief, Respondents are using the immigration detention system, including extra-territorial transfer and detention, as a means to punish individuals for asserting rights under the Refugee Act.

53. On information and belief, Petitioner has no criminal history.

CLAIMS FOR RELIEF

COUNT ONE
Violation of the Administrative Procedure Act – 5 U.S.C. § 706(2)(A)
Abuse of Discretion
Violation of 8 U.S.C. § 1226(b), 8 C.F.R. § 1236.1(c)(9)

54. Petitioner restates and realleges all paragraphs as if fully set forth here.

55. Under the APA, a court shall "hold unlawful and set aside agency action" that is an abuse of discretion. 5 U.S.C. § 706(2)(A).

56. An action is an abuse of discretion if the agency "entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise." Nat'l Ass'n of Home Builders v. Defs. of Wildlife, 551 U.S. 644, 658 (2007) (quoting Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co., 463 U.S. 29, 43 (1983)).

57. To survive an APA challenge, the agency must articulate "a satisfactory explanation" for its action, "including a rational connection between the facts found and the choice made." Dep't of Com. v. New York, 139 S. Ct. 2551, 2569 (2019) (citation omitted).

58. By categorically revoking Petitioner's release and seeking to transfer him away from the district without consideration of his individualized facts and circumstances, Respondents have violated the APA.

59. By detaining the Petitioner categorically, Respondents have further abused their discretion because there have been no changes to his facts or circumstances since the agency made its initial custody determinations that support the revocation of his release from custody.

60. Respondents have already considered Petitioner's facts and circumstances and determined that he was not a flight risk or danger to the community. There have been no changes to the facts that justify this revocation of his release on his own recognizance. The fact that Petitioner has already been granted release by Respondents under the same facts and circumstances shows that Respondents do not consider him, on an individualized basis, to be a danger to the community or a flight risk.

COUNT TWO
Violation of the Administrative Procedure Act – 5 U.S.C. § 706(2)(A)
Not in Accordance with Law and in Excess of Statutory Authority
Violation of 8 U.S.C. § 1226(b), 8 C.F.R. § 1236.1(c)(9)

61. Petitioner restates and realleges all paragraphs as if fully set forth here.

62. Under the APA, a court "shall . . . hold unlawful . . . agency action" that is "not in accordance with law;" "contrary to constitutional right;" "in excess of statutory jurisdiction, authority, or limitations;" or "without observance of procedure required by law." 5 U.S.C. § 706(2)(A)-(D).

63. 8 U.S.C. § 1226(b) authorizes that "[t]he Attorney General at any time may revoke a bond or parole authorized under [8 U.S.C. § 1226(a)" and rearrest a noncitizen under the initial warrant.

In implementing this statutory provision, 8 C.F.R. § 1236.1(c)(9) clarifies that such revocations of release from custody may only be carried out in the "discretion of the district director, acting district director, deputy district director, assistant district director for investigations, assistant district director for detention and deportation, or officer in charge (except foreign)."

64. It is a well-established administrative principle that "agency action taken without lawful authority is at least voidable, if not void ab initio." *L.M.-M. v. Cuccinelli*, 442 F. Supp. 3d 1, 35 (D.D.C. 2020), *citing SW General, Inc. v. NLRB,* 796 F.3d 67, 79 (D.C. Cir. 2015); s*ee also Hooks v. Kitsap Tenant Support Servs., Inc.*, 816 F.3d 550, 555 (9th Cir. 2016) (invalidating agency action because it was taken by unauthorized official).

65. On information and belief, Respondents have revoked or are revoking Petitioner's prior custody determination as a result of a categorical policy prepared by and implemented by unidentified government officials in Washington, not through the individual exercise of discretion required by law or by the individuals enumerated by regulation to do so.

66. Because Petitioner's revocation of release from custody has been made or will be categorically directed by government officials not authorized by law to make this determination, Respondents' detention of Petitioner is not in accordance with law and in excess of statutory authority.

COUNT THREE
Violation of Fifth Amendment Right to Due Process
Procedural Due Process

67. Petitioner restates and realleges all paragraphs as if fully set forth here.

68. The Due Process Clause of the Fifth Amendment to the U.S. Constitution prohibits the federal government from depriving any person of "life, liberty, or property, without due process of

law." U.S. Const. Amend. V. Due process protects "all 'persons' within the United States, including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas*, 533 U.S. at 693; *accord Flores*, 507 U.S. at 306.

69. Due process requires that government action be rational and non-arbitrary. *See U.S. v. Trimble*, 487 F.3d 752, 757 (9th Cir. 2007).

70. While the government has discretion to detain individuals under 8 U.S.C. § 1226(a) and to revoke custody decisions under 8 U.S.C. § 1226(b), this discretion is not "unlimited" and must comport with constitutional due process. *See Zadvydas,* 533 U.S. at 698.

71. "Courts have repeatedly found that the Government must provide due process to noncitizens before revoking supervised release and re-detaining them." *See, e.g., Gomez v. Wamsley,* CASE NO. 2:25-cv-02642-JNW, 2026 U.S. Dist. LEXIS 22488 (W.D. Wa. Feb. 3, 2026), at 6 (collecting cases).

72. Here, Respondents have chosen to revoke Petitioner's release in an arbitrary manner and not based on a rational and individualized determination of whether he is a safety or flight risk, in violation of due process. Because no individualized custody revocation has been made and no circumstances have changed to make Petitioner a flight risk or a danger to the community, Respondents' revocation of Petitioner's release violates his right to procedural due process.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests this Court to grant the following:

(1) Assume jurisdiction over this matter;

(2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days;

(3) Declare that Petitioner's detention without an individualized determination violates the Due Process Clause of the Fifth Amendment;

(4) Declare that Petitioner's revocation of parole from custody was made in violation of statute and regulation;

(5) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner from custody;

(6) Issue an Order prohibiting the Respondents from transferring Petitioner from the district without the court's approval;

(7) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law;

(8) Order that Respondents reunite Petitioner with his car and legal documents; and

(9) Grant any further relief this Court deems just and proper.

Dated: March 5, 2026.

/s/ Charles J Vernon
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VERIFICATION

I, Charles J Vernon, declare as follows:

1. I am an attorney employed at El Comite de Longmont, a non-profit organization in Longmont, CO.

2. I represent the petitioner Mr. Pineda Tijerino, who described to me in detail the circumstances of his persecution in and flight from Nicaragua, as well as his Order of Release and its revocation, resulting in his detainment.

3. I have read the foregoing Petition for Writ of *Habeas Corpus* and know the contents thereof to be true to my knowledge, information, and belief.

I certify under penalty of perjury that the foregoing is true and correct and that this declaration was executed on March 5, 2026

/s/ Charles J Vernon
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CERTIFICATE OF SERVICE

I, Charles J Vernon, hereby certify that on March 5, 2026 I filed the foregoing with the Clerk of Court using the CM/ECF system. I also emailed Kevin Traskos and Joann Stark at Kevin.Traskos@usdoj.gov and Joann.Stark@usdoj.gov a copy of the foregoing and will serve via certified mail within 48 hours or earlier pursuant to any forthcoming Court order to Respondents and their Representatives.

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