IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:26-cv-01099

JIORDAN HECTOR LOPEZ RICARDO,

Petitioner,

v.

JUAN BALTAZAR, in his official capacity as Warden of the Denver Contract Detention Facility;
ROBERT HAGAN, in his official capacity as Field Office Director, Denver Field Office of U.S. Immigration and Customs Enforcement;
TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement;
MARKWAYNE MULLIN, in his official capacity as Secretary of U.S. Department of Homeland Security; and
PAMELA BONDI, in her official capacity as Attorney General of the United States.

Respondents.

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. Petitioner, JIORDAN HECTOR LOPEZ RICARDO, by and through undersigned counsel, respectfully moves this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241. Ricardo is currently detained at the Denver Contract Detention Facility in Aurora, Colorado, under the custody and control of Respondents.

2. This case presents a narrow but urgent constitutional question. On February 6, 2026, an Immigration Judge granted Ricardo's Form I-485, Application for Adjustment of Status under the Cuban Adjustment Act. Nevertheless, Ricardo remains detained solely because Respondents chose to appeal that ruling on March 9, 2026.

3. Ricardo's continued detention violates the Fifth Amendment. After an Immigration Judge granted Lawful Permanent Resident status, Ricardo's detention ceased to bear a reasonable relationship to any legitimate civil immigration purpose.

4. Ricardo's continued detention is also unlawful because Respondents re-detained him without notice and without any hearing before a netural decisionmaker to determine whether re-detention was justified. Having previously released him and allowed him to live in the community for years, Respondents could not abruptly revoke that liberty without due process.

5. The Court should therefore grant the Petition for Writ of Habeas Corpus and order Ricardo's immediate release.

CUSTODY

6. Ricardo has been in the custody of Respondents since November 9, 2025. He is currently detained at the Denver Contract Detention Facility in Aurora, Colorado, under Respondents' direct physical control and supervision.

JURISDICTION AND VENUE

7. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1651 (All Writs Act), 28 U.S.C. § § 2201-02 (declaratory relief), and Article I, section 9, clause 2 of the U.S. Constitution (Suspension Clause), as Ricardo is in custody and challenges his custody in violation of the Constitution and laws of the United States.

8. Federal district courts have jurisdiction under 28 U.S.C. § 2241 to hear habeas claims by individuals challenging the lawfulness of their detention. *See Zadvydas v. Davis*, 533 U.S. 678, 678 (2001).

9. Venue is proper in this District under 28 U.S.C. § 1391 and 28 U.S.C. § 2242 because Ricardo is confined in this District, at least one Respondent is in this District, Ricardo's immediate physical custodian is in this District, and a substantial part of the events giving rise to the claims in this action occurred in this District. *See Trump v. J.G.G.*, 145 S. Ct. 1003, 1005–06 (2025) (per curiam) ("For core habeas petitions, jurisdiction lies in only one district: the district of confinement" (internal quotation marks and citation omitted)).

HABEAS CORPUS

10. Challenges to immigration detention are properly brought directly through habeas. *Soberanes v. Comfort*, 388 F.3d 1305, 1310 (10th Cir. 2004). More specifically, 28 U.S.C. § 2241 "confers jurisdiction upon the federal courts to hear such cases." *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001) (citing 28 U.S.C. § 2241(c)(3)) (authorizing any person to claim in federal court that they are being held "in custody in violation of the Constitution or laws ... of the United States").

11. The fundamental purpose of § 2241 habeas proceeding is the same as that of § 2254 habeas and § 2255 proceedings: they are an attack by a person in custody upon the legality of that custody, and that the traditional function of the writ is to secure release from illegal custody. *McIntosh v. U.S. Parole Com'n*, 115 F.3d 809, 811 (10th Cir. 1997) (quoting *Preiser v. Rodriguez*, 411 U.S. 475, 484 (1973)).

PARTIES

A. Petitioner

12. Petitioner Jiordan Hector Lopez Ricardo was detained by Respondents on November 9, 2025, and has been detained at the Denver Contract Detention Facility in Aurora, Colorado, since that date. He is in the custody and direct control of Respondents and their agents.

B. Respondents

13. Respondent Juan Baltazar is the Warden of the Denver Contract Detention Facility, a private, for-profit detention facility that contracts with ICE to detain individuals suspected of civil immigration violations. Respondent Baltazar has immediate physical custody of Ricardo and is sued in his official capacity.

14. Respondent Robert Hagan is the Field Office Director of the U.S. Immigration and Customs Enforcement Denver Field Office. In this capacity, he is responsible for the administration of immigration laws and the execution of immigration enforcement and detention policy within ICE's Denver Area of Responsibility, including the detention of Ricardo. Respondent Hagan maintains an office and regularly conducts business in this district and is sued in his official capacity.

15. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement. As the Senior Official Performing the Duties of the Director of ICE, he is responsible for the administration and enforcement of the immigration laws of the United States; routinely transacts business in this District; and is legally responsible for any effort to detain and remove Ricardo. Respondent Lyons is sued in his official capacity.

16. Respondent Markwayne Mullins is the Secretary of the U.S. Department of Homeland Security and has ultimate authority over DHS. In that capacity and through his agents, Respondent Mullins has broad authority over and responsibility for the operation and enforcement of the immigration laws; routinely transacts business in this District; and is legally responsible for pursuing any effort to detain and remove Ricardo. Respondent Mullins is sued in his official capacity.

17. Respondent Pamela Bondi is the Attorney General of the United States and the most senior official of the U.S. Department of Justice (DOJ). In that capacity and through her agents, she is responsible for overseeing the implementation and enforcement of the federal immigration laws. The Attorney General delegates this responsibility to the Executive Office for Immigration Review, which administers the immigration courts and the Board of Immigration Appeals. Respondent Bondi is sued in her official capacity.

EXHAUSTION

18. In habeas claims, exhaustion of administrative remedies is prudential, not jurisdictional. *Hernandez v. Sessions*, 872 F.3d 976, 988 (9th Cir. 2017). As applicable here, a court may waive the prudential exhaustion requirement if "administrative remedies are inadequate or not efficacious, pursuit of administrative remedies would be a futile gesture, irreparable injury will result, or the administrative proceedings would be void." *Id.* (quoting *Laing v. Ashcroft*, 370 F.3d 994, 1000 (9th Cir. 2004) (citation and quotation marks omitted). Here, exhaustion is not required because no other forum exists in which Ekenge can raise his claims, exhaustion would be futile, there is no requirement to exhaust before challenging the constitutionality of an arrest or detention, and Ekenge will "suffer irreparable harm if unable to secure immediate judicial consideration of [their] claim." *McCarthy v. Madigan*, 503 U.S. 140, 147 (1992).

FACTUAL ALLEGATIONS

19. Ricardo is a 36 year-old native and citizen of Cuba. On July 10, 2022, U.S. Border Patrol arrested him at Eagle Pass, Texas, immediately after he entered the United States without inspection. On July 11, 2022, DHS granted Ricardo parole into the United pursuant to 8 U.S.C. § 1182(d)(5)(A). Ricardo has continuously resided in the United States since then. *See DHS Release Paperwork, dated July 2022, attached hereto as Attachment C.*

20. Ricardo has no criminal history. *See Colorado Bureau of Investigations, No Record of Colorado Arrests, dated March 16, 2026, attached hereto as Attachment E.*

21. After completing the one-year physical presence requirement, sometime in 2023, Ricardo filed a Form I-485 Application to Register Permanent Residence or Adjust Status with U.S. Citizenship and Immigration Services (USCIS). Ricardo's I-485 application for an adjustment of status was based on his eligibility under the Cuban Adjustment Act of 1966, Pub. L. No. 89-732, 80 Stat. 1161 (CAA), which allows natives or citizens of Cuba in the United States to apply for lawful permanent resident (LPR) status if they meet certain eligibility criteria.

22. Despite his pending I-485 application, sometime prior to November 9, 2025, Ricardo received a letter from DHS instructing him to report to their Centennial, Colorado office located at 12445 E Caley Avenue.

23. When Ricardo reported as instructed on November 9, 2025, he was arrested by DHS officers pursuant to an administrative warrant without explanation. *See Form I-200, Warrant for Arrest of Alien, dated November 9, 2025, attached hereto as Attachment B.*

24. Prior to Ricardo's re-detention, he did not receive written notice of the reason for his re-detention.

25. Prior to Ricardo's re-detention, he never received a hearing before a neutral decisionmaker to determine if his re-detention was justified.

26. DHS thereafter commenced removal proceedings, charging Ricardo with being inadmissible under 8 U.S.C. § § 1182(a)(6)(A)(i) and 1182(a)(7)(A)(i)(I). *See Notice to Appear, dated November 9, 2025, attached hereto as Attachment A.*

27. On February 6, 2026, the Immigration Judge Ivan Gardzelewski granted Ricardo's application for Adjustment of Status pursuant to the Cuban Adjustment Act. *See Order of the Immigration Judge Granting CAA, dated February 6, 2026, attached hereto as Attachment D.*

28. On March 9, 2026, DHS appealed that decision. *See EOIR-26, Notice of Appeal from a Decision of an Immigration Judge, dated March 9, 2026, attached hereto as Attachment G.*

29. Ricardo remains detained solely because DHS appealed the Immigration Judge's grant of adjustment.

30. Ricardo's arrest and continued detention causes ongoing and irreparable harm. Each additional day he spends in unlawful detention subjects him to further irreparable harm.

LEGAL FRAMEWORK

31. Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty protected by the Due Process Clause. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

32. Consistent with this principle, individuals released on parole or other forms of conditional release have a liberty interest in their "continued liberty." *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972).

33. Such liberty is protected by the Fifth Amendment because, "although indeterminate, [it] includes many of the core values of unqualified liberty," such as the ability to be gainfully employed and live with family, "and its termination inflicts a 'grievous loss' on the [released individual] and often on others." *Id.*

34. To protect against arbitrary re-detention and to ensure the right to liberty, due process requires "adequate procedural protections" that test whether the government's asserted justification for a noncitizen's physical confinement "outweighs the individual's constitutionally protected interest in avoiding physical restraint." *Zadvydas*, 533 U.S. at 690 (citation modified).

35. Due process thus guarantees notice and an individualized hearing before a neutral decisionmaker to assess danger or flight risk before the revocation of an individual's release. *Goldberg v. Kelly*, 397 U.S. 254, 267 (1970) ("The fundamental requisite of due process of law is the opportunity to be heard . . . . at a meaningful time in a meaningful manner." (citation modified)); *see also, e.g., Morrissey*, 408 U.S. at 485 (requiring "preliminary hearing to determine whether there is probable cause or reasonable ground to believe that the arrested parolee has committed . . . a violation of parole conditions" and that such determination be made "by someone not directly involved in the case" (citation modified)).

36. Several courts have recognized that these principles apply with respect to the re-detention of the many noncitizens that DHS has recently begun taking back into custody, often after such persons have been released for months and years. *See E.A.T.B. v. Wamsley*, --- F. Supp. 3d --- No. C25-1192-KKE, 2025 WL 2402130 (W.D. Wash. Aug. 19, 2025); *Valdez v. Joyce*, No. 25 CIV. 4627 (GBD), 2025 WL 1707737 (S.D.N.Y. June 18, 2025) (ordering immediate release due to lack of pre-deprivation hearing); *Pinchi v. Noem*, --- F. Supp. 3d ---, No. 5:25-CV-05632-PCP, 2025 WL 2084921 (N.D. Cal. July 24, 2025) (similar); *Maklad v. Murray*, No. 1:25-CV-00946 JLT SAB, 2025 WL 2299376 (E.D. Cal. Aug. 8, 2025) (similar); *Garcia v. Andrews*, No. 1:25-CV-01006 JLT SAB, 2025 WL 2420068 (E.D. Cal. Aug. 21, 2025) (similar); *Ekenge v. Baltazar*, No. 1:26-cv-00630-SBP (D. Colo. March 5, 2026).

37. Substantive due process requires that all forms of civil detention—including immigration detention—bear a "reasonable relation" to a non-punitive purpose. *See Jackson v. Indiana*, 406 U.S. 715, 738 (1972). The Supreme Court has recognized only two permissible non-punitive purposes for immigration detention: ensuring a noncitizen's appearance at immigration

proceedings and preventing danger to the community. *Zadvydas*, 533 U.S. at 690–92; *see also Demore v. Kim*, 538 U.S. 510 at 519–20, 527–28, 531 (2003).

CLAIMS FOR RELIEF

Count One
Violation of the Immigration and Nationality Act
Detention Not Authorized by 8 U.S.C. § 1226(a)

38. Ricardo realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

39. 8 U.S.C. § 1226(a) authorizes arrest, detention, or release on bond only "pending a decision on whether the alien is to be removed from the United States." 8 U.S.C. § 1226(a). That detention authority is therefore limited. It exists only so long as custody remains tethered to the statutory purpose Congress identified: detention pending a merits decision in removal proceedings.

40. Before February 6, 2026, Respondents could at least argue that detention was incident to ongoing removal proceedings while the Immigration Court determined whether Ricardo would be removed or instead granted lawful status. But after the Immigration Judge granted CAA adjustment, the posture changed. Ricardo is no longer merely seeking relief; he has prevailed before the court charged with adjudicating that relief in removal proceedings. The remaining issue is not whether he qualifies for adjustment in the first instance, but whether DHS can overturn that favorable adjudication on appeal.

41. Once the Immigration Judge granted adjustment, Ricardo was no longer "pending a decision on whether [he] is to be removed from the United States," but instead is now permitted to remain lawfully in the United States. By the plain language of 8 U.S.C. § 1226(a), Respondents have lost authority for Ricardo's continued detention, even with the pending appeal. At that point,

continued detention ceased to be detention pending a merits determination and instead became detention solely because Respondents elected to pursue appellate review.

42. Section 1226(a) does not authorize detention for that purpose. Its text permits detention only pending a decision on removability, not detention by default while the government seeks to overturn a grant of relief already entered in the noncitizen's favor. Reading § 1226(a) to authorize continued detention in these circumstances would untether custody from the statute's text and transform a limited pre-decision detention provision into a broad license for incarceration throughout the government's entire appellate process. Nothing in the INA authorizes that result.

43. Any legal justification for Ricardo's detention has ceased to exist. Following the IJ's grant of his application for residency, he is no longer inadmissible. Therefore, there is no statutory authority authorizing his detention.

44. As such, the Court should order Ricardo immediately released.

Count Two
Violation of the Due Process Clause of the Fifth Amendment to the United States Constitution – Substantive Due Process

45. Ricardo realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

46. The Due Process Clause protects all persons against arbitrary detention. *See Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty" that the Due Process Clause protects. *Id.* at 690.

47. Respondents' interest in civil immigration detention is to effectuate removal and safeguard the community.

48. On February 6, 2026, the Immigration Judge granted Ricardo's application for adjustment of status under the Cuban Adjustment Act. Although DHS has appealed, the Immigration Judge's ruling is still a formal adjudication by the government that Ricardo qualifies for permanent resident status under the governing statute. While an appeal is pending, that does not erase the constitutional significance of the adjudication the government has already made.

49. Due process also prohibits Respondents from punishing people through civil detention. Civil detention becomes punitive when its nature or duration is unreasonable relative to the purpose for which the individual is detained—in this case, effectuating removal and safeguarding the community.

50. Because Ricardo is not removable and he has no criminal history, Respondents have no lawful interest in or authority to detain him and his detention has become excessive in relation to Respondents' interests.

51. When a civil restriction is excessive in relation to a governmental interest, the punitive detention violates the person's right to substantive due process.

52. Ricardo's detention is excessive both in nature and duration. He is a lawful permanent resident who is not removable from the United States.

53. For these reasons, Ricardo's unjustified and prolonged detention violates substantive due process.

54. Accordingly, the Court should order Ricardo immediately released.

Count Three
Violation of the Due Process Clause of the Fifth Amendment to the United States Constitution – Procedural Due Process

55. Ricardo realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

56. When Respondents released Ricardo with parole on July 11, 2022, he obtained a protected liberty interest in remaining out of custody. *See Pinchi v. Noem*, 792 F. Supp. 3d 1025, 1032 (N.D. Cal. July 24, 2025); *Rojas v. Almodovar*, No. 25-cv-7189-LJL, 2025 WL 3034183, at *6 (S.D.N.Y. Oct. 30, 2025) (citing *Pinchi* and noting that "a liberty interest, once granted, cannot be revoked without due process" in finding that the due process rights of a petitioner who had had his parole status revoked were violated); *Savane v. Francis*, 801 F. Supp. 3d 483, 494 (S.D.N.Y. 2025) ("Other courts confronting the question of what process is required to revoke parole once granted, even when that revocation is discretionary, have held that a noncitizen has a significant liberty interest in remaining out of custody once parole is granted.") (collecting cases); *Trejo v. Warden of ERO El Paso E. Montana*, 807 F. Supp. 3d 697, 709-10 (W.D. Tex. 2025) (finding that a prisoner released under an order of supervision possessed "a cognizable interest in his continued freedom from detention" and noting that in accordance with the longstanding principle in the criminal context that due process requires a pre-deprivation hearing before the revocation of parole, 1225(b) parolees acquire a protectable liberty interest in remaining out of custody on bond) (collecting cases).

57. Accordingly, even if § 1225 applied to Ricardo rather than § 1226, Ricardo enjoys a due process interest in not being re-detained, as he was here.

58. Pursuant to *Mathews v. Eldridge*, courts weight the following factors in evaluating due process claims: (1) "the private interest that will be affected by the official action"; (2) "the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards"; and (3) "the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *Mathews*, 424 U.S. at 335.

59. Ricardo has a significant private liberty interest at stake.

60. Ricardo's interest in physical freedom "is the most elemental of liberty interests." *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004); *Vizguerra-Ramirez v. Baltazar*, No. 25-cv-00881-NYW, 2025 WL 3653158, at *13 (D. Colo. Dec. 17, 2025) (same).

61. Ricardo is being held in an ICE detention facility far removed from any friends or family. *See Velasco Lopez v. Decker*, 978 F.3d 842, 851 (2d Cir. 2020) (finding, in assessing the first *Mathews* factor, that "[t]he deprivation [petitioner] experienced while incarcerated was, on any calculus, substantial. He was locked up in jail. He could not maintain employment or see his family or friends or others outside normal visiting hours.").

62. This is despite him not being accused of any crime. *See, e.g.*, *Maza v. Hyde*, No. 25-cv-12407-IT, 2025 WL 2951922, at *3 (D. Mass. Oct. 20, 2025).

63. The risk of erroneous deprivation is also considerable in this case.

64. "[C]onsidering that petitioner 'was previously found to not be a danger or a flight risk, the risk of erroneous deprivation' is particularly high if, as is the case now, no hearing has been provided." *Arzate v. Andrews*, No. 25-cv-00942-KES-SKO, 2025 WL 2230521, at *5 (E.D. Cal. Aug. 4, 2025); *see also, e.g.*, *Orellana v. Noem*, 807 F. Supp. 3d 745, 754 (W.D. Ky. 2025) ("A re-detention, without any individualized assessment, leads to a high risk of erroneous deprivation of an individual's liberty interest.").

65. Ricardo was previously released after it was determined he was not a danger to the community or a flight risk. The fact that Respondents may believe they had a valid reason to detain Ricardo does not eliminate their obligation to effectuate the detention in a manner that comports with due process. *E.A.T.B. v. Wamsley*, 795 F. Supp. 3d 1316, 1322 (W.D. Wash. 2025).

66. Respondents have not effectuated the detention in such a manner here.

67. Respondents' interest in arresting and detaining Ricardo without a hearing is not substantial under the circumstances. "[T]he Government's interest in re-detaining non-citizens previously released without a hearing is low . . . [and any] costs are far outweighed by the risk of erroneous deprivation of the liberty interest at issue." *E.A.T.B.*, 795 F. Supp. 3d at 1324.

68. Moreover, the public interest favors Ricardo rather than Respondents here. Unnecessary detention "imposes substantial societal costs," as it "separates families and removes from the community breadwinners, caregivers, parents, siblings and employees." *Hernandez-Lara v. Lyons*, 10 F.4th 19, 33 (1st Cir. 2021) (quoting *Velasco Lopez*, 978 F.3d at 855).

69. Ricardo has experienced these hardships; he has no criminal record, but he has nevertheless been arrested and has been held in detention separated from his family and broader community.

70. Respondents' interest here is minimal, especially in contrast to the significant countervailing interests at stake for Ricardo.

71. Accordingly, the *Mathews* factors each weigh heavily in favor of Ricardo's release and Ricardo's re-detention violates the Due Process Clause of the Fifth Amendment, and the Court should order Ricardo immediately released.

PRAYER FOR RELIEF

Petitioner JIORDAN HECTOR LOPEZ RICARDO respectfully requests that this Court:

(1) Assume jurisdiction over this matter;

(2) Issue an Order to Show Cause ordering Respondents to show cause within three (3) days as to why this Petition should not be granted as required by 28 U.S.C. § 2243;

(3) Grant the Petition for Writ of Habeas Corpus and order Respondents to immediately release Ricardo from custody;

(4) Declare that Respondents lack lawful authority to continue detaining Ricardo following the Immigration Judge's grant of Adjustment of Status, and that continued detention violates the Due Process Clause of the Fifth Amendment and the Immigration and Nationality Act;

(5) Order Respondents to implement and give effect to the Immigration Judge's grant of Lawful Permanent Resident status without delay, including by updating all DHS, ICE, and ERO records and databases to reflect LPR status and to cease treating Ricardo as an alien subject to removal proceedings or mandatory detention;

(6) Order Respondents to issue documentary proof of lawful permanent resident status immediately, including an ADIT (I-551) stamp or other written confirmation sufficient to demonstrate lawful status and eligibility for release and employment authorization, and to take all steps necessary to ensure the Form I-551 is issued in the ordinary course;

(7) Enjoin Respondents from re-detaining Ricardo absent a new, independent, and lawful basis consistent with his LPR status, and require that any future custody be supported by written notice of the legal authority and factual predicate;

(8) Award Ricardo reasonable attorney's fees and costs under the Equal Access to Justice Act, 28 U.S.C. § 2412, upon the filing of a separate Motion with the Court; and

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

Dated this 18th day of March 2026.

Respectfully submitted,

/s/ Skylar M. Larson

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ATTORNEY FOR PETITIONER

VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF PURSUANT TO 28 U.S.C. § 2242

I am submitting this verification on behalf of the Petitioner, Jiordan Hector Lopez Ricardo, because I am the attorney for Ricardo. I have discussed with Ricardo the events described in this Petition. Based on those discussions, I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Executed on March 18, 2026, at Fort Collins, Colorado.

/s/ Skylar M. Larson
Skylar M. Larson, Esq.

ATTORNEY FOR PETITIONER

CERTIFICATE OF SERVICE

I hereby certify that service of the foregoing **Petition for Writ of Habeas Corpus and Attachments A-G** will be effectuated contemporaneously with the Court's issuance of an Order directing service, at which time true and correct copies will be served to the following:

JUAN BALTAZAR, Warden of the Denver Contract Detention Facility
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Aurora, CO 80010
Respondent

ROBERT HAGAN, Field Office Director, Denver ICE Field Office
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Attorney for Respondents

/s/ Skylar M. Larson
Skylar M. Larson, Esq.

ATTORNEY FOR PETITIONER

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Respondents.

ATTACHMENTS TO PETITION FOR WRIT OF HABEAS CORPUS

ATTACHMENT A.	Notice to Appear, dated November 9, 2025
ATTACHMENT B.	DHS Form I-200, Warrant for Arrest of Alien, dated November 9, 2025
ATTACHMENT C.	DHS Release Paperwork, dated July 2022
ATTACHMENT D.	Order of the Immigration Judge Granting CAA, dated February 6, 2026
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