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UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

Jose Francisco Garduno Zetina

Petitioner,

v.

KEVIN RAYCRAFT, in his official capacity as Field Office Director of Enforcement and Removal Operations, Detroit Field Office, Immigration and Customs Enforcement; Kristi NOEM, in her official capacity as Secretary, U.S. Department of Homeland Security; U.S. DEPARTMENT OF HOMELAND SECURITY; Pamela BONDI, in her official capacity as U.S. Attorney General; EXECUTIVE OFFICE FOR IMMIGRATION REVIEW,

Respondents.

Case No.

Hon.

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. Petitioner, Jose Frnacisco Garduno Zetina legally entered the United States as a parolee pursuant to the CBPOne program on August 08, 2022. He has been unlawfully detained by Respondents for almost six months since September 29, 2025, and denied bond on false and unsupported facts.
2. On February 25th, 2026 this Court ordered Respondents to immediately release Petitioner or provide him with a bond hearing pursuant to 8 U.S.C. § 1226(a), despite Petitioner being an arriving alien who is statutorily not eligible for such bond proceedings.
3. Petitioner's bond hearing was held before Immigration Judge Ellen Karesh on March 03, 2026. Despite Petitioner having entered the country legally, being lawfully married to a U.S. Citizen, and having an application for adjustment of status pending with USCIS with a visa immediately available, IJ Karesh denied bond finding that Petitioner was a "*Respondent is a flight risk. He has entered the United States unlawfully and married a United States Citizen at age 18. The relief Respondent is seeking is speculative.*"
4. The bond hearing did not comport with due process, first the IJ improperly placed the burden of proof on Petitioner, and second the IJ completely ignored the record before her, and denied bond on false facts not supported by any of the evidence or arguments presented by Petitioner or DHS.
5. Petitioner respectfully requests that this Court enter a writ of habeas corpus ordering the immediate release of Petitioner, for his detention is unlawful and unnecessarily prolonged.

JURISDICTION

1. Petitioner is in the physical custody of Respondents. Mr. Garduno Zetina is detained at the North Lake Correctional Facility in Baldwin, Michigan.

2. This Court has jurisdiction under 5 U.S.C. § 701 et seq. (the Administrative Procedure Act), 28 U.S.C. § 2241(c)(3) (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause).

3. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651, and the Administrative Procedure Act, 5 U.S.C. § 701 et seq. The Court may grant declaratory and injuctive relief pursuant to 28 U.S.C. §§ 2201-2201; 5 U.S.C. §702, and 28 U.S.C. §1361. Respondent have waiver their sovereign immunity pursuant to 5 U.S.C. § 702.

VENUE

4. Venue is proper in the Western District of Michigan under 28 U.S.C. § 2241 and 28 U.S.C. § 1391. Petitioner is detained in an immigration detention facility at the direction of, and is in the immediate custody of, Respondent Kevin Raycraft. *See Roman v. Ashcroft*, 340 F.3d 314, 320-21 (6th Cir. 2003).

5. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims and relevant facts occurred in the Western District.

REQUIRMENTS UNDER 28 U.S.C. §2243

6. The Court must grant the petition for writ of habeas corpus or order Respondents to show cause "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Respondents must file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

7. Habeas corpus is "perhaps the most important writ known to the constitutional law… 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) (emphasis added). "The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and receives prompt action from him within the four corners of the application." Yong v. I.N.S., 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

PARTIES

8. Petitioner Jose Francisco Garduno Zetina is a native of Mexico who has resided in the United States since August 2023. He has been in Immigration Detention since September 29, 2025, and is currently detained at the Northlake Processing Center in Baldwin, Michigan.

9. Respondent Kevin Raycraft is the Director of the Detroit Field Office of ICE's Enforcement and Removal Operations division. As such, Director Raycraft is Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. He is named in his official capacity.

10. Respondent Kristi Noem is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the INA and oversees ICE, which is responsible for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

11. Respondent Department of Homeland Security (DHS) is the federal agency responsible for implementing and enforcing the INA, including the detention and removal of noncitizens.

12. Respondent Pamela Bondi is the Attorney General of the United States. She is responsible for the Department of Justice, of which the Executive Office for Immigration Review and

the immigration court system it operates are component agencies. She is sued in her official capacity.

13. Respondent Executive Office for Immigration Review (EOIR) is the federal agency responsible for implementing and enforcing the INA in removal proceedings, including for custody redeterminations in bond hearings.

EXHASUTION OF ADMINISTRATIVE REMEDIES

14. There is no statutory requirement of exhaustion of administrative remedies where a noncitizen challenges the lawfulness of his detention. *Arango Marquez v. I.N.S.*, 346 F.3d 892, 897 (9th Cir. 2003). Any requirements of administrative exhaustion is therefore purely discretionary. *Shurney v. I.N.S.,* 201 F. Supp. 2d 783, 789 (N.D. Ohio 2001)

15. In making that decision, the Court should consider the urgency of the need for immediate review. "Where a person is detained by executive order… the need for collateral review is most pressing… In this context the need for habeas corpus is more urgent." Boumediene v. Bush, 553 U.S. 723, 783 (2008) (waiving administrative exhaustion for executive detainees).

16. In general, courts do not require exhaustions "(1) where such requirement would subject the individual to an unreasonable or indefinite time frame for administrative action, (2) where the administrative agency lacks the competence to resolve the particular issue presented, or (3) the exhaustion of administrative remedies would be futile because the administrative body is show to be biased or has pre-determined the issue before it." *Shurney,* 201 F. Supp. 3d at 789.

17. By regulation, arriving aliens are ineligible for bond. 8 C.F.R. §1003.19 (h)(2)(i)(B). Exhaustion before the BIA would therefore be futile. See 8 C.F.R. § 1003.1(d) (providing that the BIA is governed by applicable regulations).

18. Further, "the BIA does not have jurisdiction to adjudicate constitutional issues …." United States v. Gonzalez-Roque, 301 F.3d 39, 48 (2d Cir. 2002). Therefore, any administrative proceedings would be futile because petitioner raises a constitutional due process claim, Marogi v. Jenifer, 126 F. Supp. 2d 1056, 1060 (E.D. Mich. 2000)

FACTS

19. Petitioner Jose Francisco Garduno Zetina is a citizen of Mexico.

20. Petitioner was paroled into the United States on August 08, 2022. See Exh. A. He, together with his parents and siblings, timely applied for Asylum and related relief before the immigration court.

21. DHS revoked Mr. Garduno Zetina's parole without notice or case-by-case analysis on April 18, 2025. See Exh. B.

22. Mr. Garduno Zetina and has family were designated as "arriving aliens". See Exh. C.

23. Mr. Garduno Zetina has resided continuously in Detroit, Michigan since August 2022.

24. Mr. Garduno Zetina married Ms. Esmeralda Yanel Perez Bartolon, a U.S. Citizen on March 21, 2025 in the City of Detroit, County of Wayne. See Exh. D. Petitioner and his wife were at the time, consenting adults, and legally marry after dating for several months, and according to the laws of the State of Michigan.

25. Ms. Perez Bartolon filed a an I-130 Petition for Alien Relative on Mr. Garduno Zetina's behalf with U.S. Citizenship and Immigration Services (USCIS), on July 03, 2025. See Exh. E.

26. On September 29, 2025, ICE raided Petitioner's place of employment in Troy Michigan and arrested several noncitizens. Petitioner has been detained at North Lake Detention Facility since then.

27. ICE informed the Detroit Immigration Court of the detention on October 02, 2025, and a Master hearing was scheduled for October 24, 2025. Mr. Garduno Zetina appeared at that Master Hearing represented by counsel, who requested attorney preparation time. A second Master Hearing was scheduled for November 13, 2025.

28. On the November 13, 2025 Petitioner filed a Motion to Terminate proceedings pursuant to the discretionary authority granted to Immigrant Judges, see 8 C.F.R. 1003.18(d)(1)(ii)(B). The Immigration Judge denied the motion, and order Petitioner to file an alternative form of relief in the form of Asylum, Withholding of Removal, and protection under the Convention Against Torture, form I-589. A third Master Hearing was scheduled for January 13, 2026.

29. Petitioner filed form I-589 which remains pending with the Immigration Court on December 01, 2025.

30. At the January 13, 2026 hearing, Petitioner, through counsel, requested DHS to submit a request to USCIS to expedite the processing of Petitioner's form I-130. DHS indicated they needed to get approval from their supervisor. Petitioner, nor his counsel, heard again about this request.

31. On December 19, 2026, Petitioner filed an application for adjustment of status, Form I-485 with USCIS. USCIS issued a receipt on January 13, 2026, and a Request for Evidence on January 22, 2026, requesting that Petitioner submits co-sponsor documents and medical examination. Petitioner has been unable to obtain the medical examination due to his

remote location in detention, no medical professionals are able to perform the medical exam, except for one, who charges over $2,000 (an exam of this kind is usually between $350 and $600). Petitioner nor his wife have the funds to afford it. Counsel for Petitioner made multiple attempts to contact ICE telephonically to coordinate Petitioner's transport to his biometrics appointment and medical examination. ICE has not returned any of Counsel's messages.

32. On January 07, 2026, DHS filed a Motion to Pretermit[1] Petitioners I-589 application for asylum, and have him removed to a third country pursuant to ACA.

33. On January 13, 2026, Petitioner had a third Master Calendar hearing. Petitioner's counsel made an oral Motion to Terminate proceedings, again pursuant to 8 C.F.R. 1003.18(d)(1)(ii)(B). The Immigration Judge indicated that he would entertain the motion only if Petitioner's I-130 is adjudicated by USCIS and requested that DHS's requests to expedite that application. DHS refused to do so.

34. On February 25th, 2026 this court issued a writ of habeas corpus ordering Respondents to immediately release Petitioner, or schedule a bond hearing. Respondents scheduled a bond hearing for March 03, 2026 before Immigration Judge Ellen Karesh, who conducted the hearing.

35. At the bond hearing of March 03, 2026 Petitioner provided a plethora of evidence to show he was not a danger to the community, or a flight risk, that he had entered the United States lawfully by taking advantage of the CBPOne program, and that he had pending applications with USCIS which are not speculative in nature. See Exh F. The evidence was admitted

[1] The decision for the DHS's Motion to Pretermit has been held in abeyance until Petitioner's Individual Hearing. If granted, Petitioner could be deported to a third country where he has never lived, nor has any ties or relatives.

into the record.

36. DHS presented no evidence before the hearing and ultimately submitted only a Form I-213 containing a vague statement suggesting Petitioner had mistakenly reported his entry as March 2024 instead of August 2023. See Exh. G.DHS offered no further evidence and made no argument regarding bond. After hearing only from Petitioner's counsel and briefly questioning Petitioner—who testified he entered once, in August 2023—the Immigration Judge issued a decision disregarding the record.

37. IJ Karesh denied bond because "*Respondent is a flight risk. He has entered the United States unlawfully and married a United States Citizen at age 18. The relief Respondent is seeking is speculative*" Exh. H.

38. Petitioner's individual hearing was scheduled for March 10, 2026 at 3:00PM. On that day, and without prior notice, IJ Karesh informed counsel at the time of the hearing that it was not going to proceed. A new individual hearing was scheduled for April 23, 2026.

39. Petitioner who was legally paroled into the United States, has an immediately available visa that only USCIS can grant, and is neither a flight or a danger risk, has been unlawfully detained, and separated from his family for 5 months and 2 weeks.

40. Without relief from this court, Petitioner faces the prospect of either months, or years long detention, or worse removal to Mexico or a third country such as Ecuador, Honduras or Guatemala, where he would have to wait ten years before being able to apply for a visa to come back to the United States to be reunited with his wife.

LEGAL FRAMEWORK

41. The Due Process Clause of the Fifth Amendment to the United States Constitution, prohibits the federal government from depriving any person of "life, liberty, or property, without due process of law[.]" U.S. Const. Amend. V.

42. The right to due process extends to "all 'persons' within the United States, including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas v. Davis*, 533 U.S. 678, 693, 121 S. Ct. 2491, 150 L. Ed. 2d 653 (2001).

1. 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, 92 S. Ct. 2593, 33 L. Ed. 2d 484 (1972).

2. "Procedural due process imposes constraints on governmental decisions which deprive individuals of 'liberty' or 'property' interests within the meaning of the Due Process Clause of the Fifth or Fourteenth Amendment." *Mathews v. Eldridge*, 424 U.S. 319, 332, 96 S. Ct. 893, 47 L. Ed. 2d 18 (1976).

3. "The fundamental requirement of due process is the opportunity to be heard 'at a meaningful time and in a meaningful manner." *Mathews*, at 333 (quoting *Armstrong v. Manzo*, 380 U.S. 545, 552, 85 S. Ct. 1187, 14 L. Ed. 2d 62 (1965)).

4. Determining whether an administrative procedure provides the process constitutionally due requires consideration of three distinct factors: First, the private interest that will be affected by the official action; second, 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 finally, the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail. *Mathews*, at 335.

5. The Sixth Circuit held that the balancing test set forth in *Mathews*, regarding the adequacy of process, applies in the context of immigration detention. *See*, *United States v. Silvestre-Gregorio*, 983 F.3d 848, 852-56 (6th Cir. 2020). *See also*, *Pablo-Mendoza v. Lynch*, No. 1:25-cv-1774, 2026 U.S. Dist. LEXIS 2623, at *16 (W.D. Mich. Jan. 7, 2026); *Yakubiv v. Raycraft*, No. 1:25-cv-1792, 2026 U.S. Dist. LEXIS 219, *16 (W.D. Mich. Jan. 3, 2026); *Rujano v. Lynch*, No. 1:25-cv-1631, 2026 U.S. Dist. LEXIS 199, at *16-17 (W.D. Mich. Jan. 2, 2026).

6. Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment because the Immigration Judge's (IJ) finding that Petitioner is a flight risk was not based on any evidence.

7. In denying the Petitioner's request for bond, the IJ concluded that Petitioner posed a flight risk and therefore could not be safely released because her underlying asylum application was deemed "speculative." The Immigration Judge took no testimony during the bond hearing and did not give Petitioner an opportunity to provide any evidence to support her asylum claims, which remain pending in immigration court.

8. Moreover, it is the government's burden to establish that Petitioner poses a flight risk sufficient to justify continued civil detention without bond. Due process requires that such determinations be supported by individualized evidence, not speculation or generalized assertions. See *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Ly v. Hansen*, 351 F.3d 263, 269-70 (6th Cir. 2003).

9. Due process further requires that the burden of proving that a noncitizen is a flight risk or poses a danger to the community is placed on ICE. *See* Soto-Medina v. Lynch, No. 1:25-cv-01704 (W.D. Mich. Jan. 21, 2026) (ECF No. 8, PageId.77-78); see also *Hernandez-Lara v. Lyons*, 10 F.4th 19, 24 (1st Cir. 2021); *Velasco-Lopez v. Decker*, 978 F.3d 842, 847 (2d Cir. 2020).

Longstanding agency rules require ICE to establish a sufficient change in circumstances. *See Matter of Sugay*, 17 I&N Dec. 637, 640 (BIA 1981); see also *Bumbila Iza v. Arnott*, No. 6:25-cv-3392 at *5 (W.D. Mo. Jan. 8, 2026) (ordering immediate release); *Mejia Orozco v. Lyons*, No. 1:25-cv-01762 at * 6 and n.5 (E.D. Va. Dec. 1, 2025).

10. During the custody redetermination hearing on February 9, 2026, the government did not present any evidence establishing that Petitioner is a flight risk. The government did not offer facts proving that Petitioner had ever failed to appear in court for a scheduled hearing, attempted to evade immigration authorities at any time, violated court orders, or otherwise demonstrated an intent to flee. Instead, counsel relied primarily on the unsupported claim that Petitioner's underlying asylum application was "speculative." The government offered no evidence, either testimonial or documentary, that would connect these arguments to an actual risk that Petitioner would flee and any speculation about the likelihood of success on Petitioner's underlying asylum application does not establish flight risk. Absent actual evidence that Petitioner is likely to flee, the government failed to carry its burden. Therefore, Petitioner's continued detention violates her due process.

11. Petitioner's continued detention without bond following an inconsistent flight-risk determination is constitutionally unsound. Civil immigration detention is constitutionally permissible only where it is reasonably related to a legitimate governmental purpose, such as ensuring appearance at removal proceedings or effectuating removal. *Zadvydas*, 533 U.S. at 690-91. When detention is no longer reasonably related to those purposes, it becomes punitive and arbitrary. *Id.* at 690.

12. Here, Petitioner's continued detention rests on the IJ's determination that Petitioner is a flight risk. That finding was made in a proceeding during which, in violation of the Petitioner's due process protections, the burden of proof was placed on her and not on ICE.

13. The Sixth Circuit has long recognized that immigration detention must remain reasonable in both purpose and duration. *Ly*, 351 F.3d at 269; *Rosales-Garcia v. Holland*, 322 F.3d 386, 412 (6th Cir. 2001). Since the bond denial rests on inconsistent factual premise, Petitioner's continued detention is constitutionally unreasonable and violates due process.

14. Habeas relief is warranted to remedy the ongoing due process violation. Federal courts have authority to grant habeas relief where immigration detention violates the Constitution. 28 U.S.C. § 2241; *Jennings v. Rodriguez*, 583 U.S. 281, 292 (2018). This Court has already exercised that authority in this case by granting Petitioner's initial habeas petition.

15. Accordingly, the Court should grant the habeas petition and order Petitioner's immediate release, or in the alternative, require a new bond hearing consistent with constitutional due process requirements.

CLAIMS FOR RELIEF

COUNT I
Violation of Due Process, Fifth Amendment

16. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.

17. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001).

18. On November 2, 2023, Respondents released Petitioner and issued her an Order of Release on Recognizance.

19. There were no changed circumstances that would have authorized her re-detention after she was released on her own recognizance.

20. The government's detention of Petitioner without any notice or an opportunity to contest her detention, or without a bond hearing to determine whether she is a flight risk or danger to others violates her right to due process. *See Wekeslei Junio DA Silva v. Scott*, No. 2:25-cv-2651-RSM, 2026 U.S. Dist. LEXIS 7527, at *7-8 (W.D. Wash. Jan. 14, 2026); *Petrov v. Hermosillo*, No. C25-2647-KKE, 2026 U.S. Dist. LEXIS 7557, at *2-3 (W.D. Wash. Jan. 14, 2026); *A.C.J. v. Hermosillo*, No. 2:25-cv-02486-DGE, 2026 U.S. Dist. LEXIS 4388 (W.D. Wash. Jan. 9, 2026); *Iza v. Arnott*, No. 6:25-cv-3392-MDH, 2026 U.S. Dist. LEXIS 3159, at *1-3 (W.D. Mo. Jan. 8, 2026); *Resendiz v. Noem*, No. 4:25-CV-00159-GNS, 2025 U.S. Dist. LEXIS 254523, at *13-14, *17-19 (W.D. Ky. Dec. 9, 2025).

21. Under *Mathews*, the Court must consider the following three factors: "(1) the private interest that will be affected by official action; (2) the risk of erroneous deprivation of that interest; and (3) the government's interest, including the fiscal and administrative burdens that the additional or substitute procedures entail." *See Lopez-Campos v. Raycraft*, 797 F. Supp. 3d 771, (citing *Mathews*, 424 U.S. at 335).

22. All three *Mathews* factors weigh in favor of Petitioner.

23. First, Respondents granted Petitioner release on an order of recognizance, determining that Petitioner was not a flight risk or danger. Respondents have now detained Petitioner, and there is no dispute that Petitioner has a significant private interest in avoiding detention, as one of the "most elemental of liberty interests" is to be free from detention. *Hamdi v.*

Rumsfeld, 542 U.S. 507, 529, 124 S. Ct. 2633, 159 L. Ed. 2d 578 (2004) (citation omitted). Petitioner is "experiencing [many of] the deprivations of incarceration, including loss of contact with friends and family, loss of income earning, . . . lack of privacy, and, most fundamentally, the lack of freedom of movement." *Günaydin v. Trump*, 784 F. Supp. 3d 1175, 1187 (D. Minn. 2025).

24. Second, there is a high risk of erroneously depriving Petitioner of her freedom if Petitioner does not receive an individualized determination with the proper burden of proof.

25. Third, Respondents do not have a significant interest in Petitioner's continued detention as she is not a threat to the community and is not a flight risk. Continuing to enforce Petitioner's detention would likely impose more costs upon the Respondents, as it would be required to continue funding and overseeing Petitioner's detention. *Rujano v. Lynch*, No. 1:25-cv-1631, 2026 U.S. Dist. LEXIS 199, at *17-18 (W.D. Mich. Jan. 2, 2026).

Lastly, Petitioner's removal is not reasonably foreseeable given that Petitioner has no immigration court scheduled. *See Sangronis v. Unknown Party*, No. 1:26-cv-88, 2026 U.S. Dist. LEXIS 27506, at *7-8 (W.D. Mich. Feb. 10, 2026) (ordering immediate release where Respondents did not provide information that removal was in the reasonably foreseeable future).

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

a. Assume jurisdiction over this matter;

b. Issue a writ of habeas corpus requiring that Respondents immediately release Petitioner from custody;

c. Enjoin Respondents from re-detaining Petitioner without adequate notice or hearing;

d. Enjoin Respondents from transferring the Petitioner from the jurisdiction of this District pending these proceedings;

e. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

f. Grant any other and further relief that this Court deems just and proper.

Dated: March 21, 2026,

Respectfully submitted,

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Attorney for Petitioner

28 U.S.C. § 2242 VERIFICATION STATEMENT

I am submitting this verification on behalf of the Petitioner because I am the Petitioner's attorney. I have discussed with the Petitioner the events described in this Petition. On the basis of those discussions, I hereby verify that the statements made in this Petition are true and correct to the best of my knowledge.

Dated: March 21, 2026

Respectfully submitted,

/s/ Maria Eugenia Daniel
Maria Eugenia Daniel
CARRERA LAW OFFICES PLLC

Counsel for Petitioner