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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

Darwin Castillo

CASE NO.: '26CV2516 BAS AHG



Petitioner,

PETITION FOR WRIT OF
HABEAS CORPUS AND ORDER
TO SHOW CAUSE WITHIN
THREE DAYS; COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF

vs.

CHALLENGE TO UNLAWFUL
INCARCERATION; REQUEST FOR
DECLARATORY AND INJUNCTIVE
RELIEF

CHRISTOPHER J. LAROSE, Senior
Warden, Otay Mesa Detention Center;
PATRICK DIVVER, Field Office
Director, San Diego Office of Detention
and Removal, U.S. Immigration and
Customs Enforcement; TODD M.
LYONS, Acting Director, U.S.
Immigration and Customs Enforcement,
U.S. Department of Homeland Security;
and MARKWAYNE MULLIN, Secretary, U.S.
Department of Homeland Security,

Respondents.

Petitioner Darwin Castillo petitions this Court for a writ of habeas corpus under 28 U.S.C. § 2241 to remedy Respondents' detaining him unlawfully, and states as follows:

INTRODUCTION

1. Petitioner Darwin Castillo ("Petitioner" or "Mr. Castillo") is a Guatemalan asylum seeker detained at Otay Mesa Detention Center in San Diego, California. He fears persecution in Guatemala on account his former involvement in the Guatemalan Army, and as a result of that involvement, received threats from a narcotrafficker. Mr. Castillo has also suffered sexual harassment, child exploitation, and criminal violence, which led him to leave Guatemala.

2. Mr. Castillo entered the United States on or about December 2012.

3. Petitioner entered without inspection.

4. Respondents commenced removal proceedings against him in immigration court on or around February 15, 2026, entitling him to present his asylum claim with the due process rights under 8 U.S.C. § 1229a.

5. Since then, Petitioner has attended his immigration court hearings.

6. Respondents now seek to keep Mr. Castillo detained without a meaningful opportunity to seek a bond or custody redetermination hearing. *See* 8 U.S.C. § 1225. Respondents do so based not on Mr. Castillo's personal circumstances or individualized facts. Due to his detention, Mr. Castillo is at risk of being transferred away from the Southern District of California while he remains in Respondents' physical and legal custody.

7. But Respondents cannot evade due process requirements so easily. The U.S. Constitution requires the Respondents provide at least the rights available to him when he filed his application for asylum.

8. The Constitution protects Mr. Castillo—and every other person present in this country—from arbitrary deprivations of his liberty and guarantees him due process of law. The government's power over immigration is broad, but as the Supreme Court has declared, it "is subject to important constitutional limitations." *Zadvydas v. Davis*, 533 U.S. 678, 695 (2001). "Freedom from bodily restraint has always been at the core of the liberty protected by the Due Process Clause from arbitrary governmental action." *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992).

9. Mr. Castillo seeks declaratory and injunctive relief to compel his immediate release from the immigration jail where he has been held by DHS since being unlawfully detained on or

1 about February 15, 2026, without first being provided a due process hearing to determine whether
2 his incarceration is justified.

3 10. Absent review in this Court, no other neutral adjudicator will examine Mr. Castillo's
4 plight: Respondents will continue—unchecked—to detain him unlawfully under 8 U.S.C. §
5 1225(b)(1), INA § 235(b)(1), without due process.

6 11. For the reasons outlined below, Mr. Castillo's arrest and inability to contest his
7 arbitrary detention violate his statutory and constitutional rights, including Due Process protections
8 under the U.S. Constitution. Mr. Castillo respectfully requests that this Court should grant the
9 instant petition for a writ of habeas corpus, without any bond requirement, and for declaratory and
10 injunctive relief, to prevent such harms from recurring. Mr. Castillo also asks this Court to find that
11 Respondents' attempts to detain, transfer, and deport him are arbitrary and capricious and in
12 violation of the law, and to immediately issue an order preventing his transfer out of this district.

13 JURISDICTION

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

16 13. This court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28
17 U.S.C. § 1331 (federal question jurisdiction), art. I, § 9, cl. 2 of the United States Constitution
18 (Suspension Clause), and 28 U.S.C. § 1346 (U.S. as defendant), and 28 U.S.C. § 1651 (All Writs
19 Act).

20 14. Federal district courts have jurisdiction to hear habeas claims brought by noncitizens
21 challenging the lawfulness of their detention. *See Demore v. Kim*, 538 U.S. 510, 516-17 (2003)
22 (recognizing habeas jurisdiction over immigration detention challenges); *Zadvydas v. Davis*, 533
23 U.S. 678, 787 (2001) (same); *Y-Z-L-H v. Bostock*, No. 3:25-CV-965-SI, 2025 WL 1898025, at *3
24 (D. Or. July 9, 2025) (same); *Garcia v. Andrews*, No. 1:25-CV-01006 JLT SAB, 2025 WL
25 2420068, at *7 (E.D. Cal. Aug. 21, 2025) (same).

26 15. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241, *et*
27 *seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201, *et seq.*, the All Writs Act, 28 U.S.C. § 1651,
28 and the Court's inherent equitable powers.

29 VENUE

30 16. Venue is proper because Petitioner is in Respondents' legal and physical custody at
31 Otay Mesa Detention Center in San Diego, California. 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 Respondents' legal and physical custody, including his current and ongoing detention under the legal and physical custody of Respondent LaRose, warden of Otay Mesa Detention Center. 28 U.S.C. § 1391(e); *Rumsfeld v. Padilla*, 542 U.S. 426, 443 (2004) (habeas petition must be addressed to the federal district court of confinement); *Wairimu v. Dir., Dep't of Homeland Sec.*, No. 19-CV-174-BTM-MDD, 2019 WL 460561, at *2 (S.D. Cal. Feb. 5, 2019) (district of confinement is the preferable forum even if the Court otherwise has personal jurisdiction). For these same reasons, venue should be found proper under Local Civil Rule HC.1.

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

17. The Court must grant the petition for writ of habeas corpus or issue an order to show cause ("OSC") to the Respondents "forthwith," unless 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.*

18. 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).

19. Mr. Castillo is "in custody" for the purpose of 28 U.S.C. § 2241 because he was arrested by Respondents and remains in their legal and physical custody at Otay Mesa Detention Center in San Diego, California. He is under Respondents' and their agents' direct control.

PARTIES

20. Mr. Castillo ("Petitioner") is a 34-year-old citizen and national of Guatemala. He came to the USA when Petitioner was about 21 years old, to seek asylum, withholding of removal, or protection under the Convention Against Torture after fleeing persecution in Guatemala on account of his former involvement in the Guatemalan Army, and as a result of that involvement, received threats from a narcotrafficker. Mr. Castillo has also suffered sexual harassment, child exploitation, and criminal violence, which led him to leave Guatemala. He has had no departures since his arrival. He is married. He has one U.S. citizen child. On information and belief, he has three criminal convictions. The criminal convictions resulted from preventing a victim from reporting a crime to law enforcement, lewd conduct in public, and stalking. Upon information and

1 belief, for the convictions, Mr. Castillo was sentenced to prison and probation. Since the detention
2 on or about February 15, 2026, Mr. Castillo has remained in Respondents' custody.

3 21. Mr. Castillo is currently residing in Respondents' custody at Otay Mesa Detention
4 Center in San Diego, California, as of the time of the filing of this petition.

5 22. Respondent Christopher LaRose ("LaRose") is the Senior Warden at Otay Mesa
6 Detention Center in San Diego, California, where Mr. Castillo is detained. LaRose is responsible for
7 the day-to-day operations and confinement of non-citizens detained at that facility. He acts at the
8 direction of Respondents Divver, Lyons, and Mullin. LaRose is a custodian of Mr. Castillo and is
9 named in his official capacity.

10 23. Respondent Patrick Divver ("Divver") is the Field Office Director of ICE in San
11 Diego, California. He acts at the direction of Respondents Lyons and Mullin. ICE is responsible for
12 local custody decisions relating to non-citizens charged with being removable from the U.S.,
13 including the arrest, detention, custody status, and removal of non-citizens. The San Diego Field
14 Office's area of responsibility includes San Diego and Imperial Counties in California. Respondent
15 Divver is a custodian of Mr. Castillo and is named in his official capacity.

16 24. Respondent Todd Lyons ("Lyons") is the Acting Director of ICE, and he has
17 authority over the actions of Respondents LaRose and Divver. ICE is responsible for local custody
18 decisions relating to non-citizens charged with being removable from the U.S., including the arrest,
19 detention, custody status, and removal of non-citizens. Respondent Lyons is a custodian of Mr.
20 Castillo and is named in his official capacity.

21 25. Respondent Markwayne Mullin ("Mullin") is the Secretary of DHS and has authority
22 over the actions of all other DHS Respondents in this case, as well as all operations and federal
23 agencies of DHS, including ICE. In his capacity as Secretary of DHS, Respondent Mullin is
24 charged with faithfully administering the immigration and naturalization laws of the United States.
25 8 U.S.C. § 1103(a). Respondent Mullin is a custodian of Mr. Castillo and is named in his official
26 capacity.

27 26. Respondent ICE is responsible for local custody decisions relating to non-citizens
28 charged with being removable from the U.S., including the arrest, detention, custody status, and
removal of non-citizens.

27 27. Respondent DHS is the federal agency that has authority over the actions of ICE and
all other DHS Respondents.

28. This action is commenced against Respondents LaRose, Divver, Lyons, and Mullin (collectively, "Respondents") all in their official capacities.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

29. Petitioner has no administrative remedies to exhaust. He has been designated as having entered without inspection according to his NTA. Current DHS policy dictates that those who have entered without inspection are subject to mandatory detention, despite the ruling in *Matter of Bautista*. The Immigration Judges at Otay Mesa, where petitioner is detained, do not follow the ruling on *Matter of Bautista*, but rather follow *Matter of Yajure Hurtado*. The immigration court thus maintains they have no jurisdiction to hold a bond hearing. Without jurisdiction, petitioner has no administrative remedies to exhaust.

30. Mr. Castillo received a NTA on February 15, 2026, which was then filed before the before the Otay Mesa Immigration Court to initiate his INA § 240 immigration proceedings.

31. Mr. Castillo is also challenging the unlawfulness of Respondents' decision to detain him, independent of any decision made by any Immigration Judge in removal proceedings.

32. Therefore, a writ of habeas corpus is the sole avenue to vindicate Mr. Castillo's constitutional, statutory, and regulatory rights and restore his liberty.

LEGAL FRAMEWORK

33. 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).

34. 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).

35. 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.

36. 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

1 definition, individuals generally are eligible for asylum if they have experienced past persecution or
 2 have a well-founded fear of future persecution on account of race, religion, nationality, membership
 3 in a particular social group, or political opinions and if they are unable or unwilling to return to and
 4 avail themselves of the protection of their homeland because of that persecution or fear. 8 U.S.C. §
 1101(a)(42)(A).

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

8 38. Because of the life-or-death stakes, the statutory right to apply for asylum is robust.
 9 The right necessarily includes the right to counsel, at no expense to the government, see 8 U.S.C. §§
 10 1229a(b)(4)(A), 1362, the right to notice of the right to counsel, *see* 8 U.S.C. § 1158(d)(4), and the
 11 right to access information in support of an application, *see* § 1158(b)(1)(B) (placing the burden on
 the applicant to present evidence to establish eligibility.).

12 39. Noncitizens seeking asylum are guaranteed Due Process under the Fifth Amendment
 13 to the U.S. Constitution. *Reno v. Flores*, 507 U.S. 292, 306 (1993).

14 40. Noncitizens who are applicants for asylum are entitled to a full hearing in
 15 immigration court before they can be removed from the United States. 8 U.S.C. § 1229a. Consistent
 16 with due process, noncitizens may seek administrative appellate review before the Board of
 17 Immigration Appeals of removal orders entered against them and judicial review in federal court
 upon a petition for review. 8 U.S.C. § 1252(a) *et seq.*

18 41. Asylum is not an admission to the United States and an applicant for asylum, while
 19 they must be physically present in the United States to apply, need not apply for or seek admission
 20 to the United States. *Matter of V-X-*, 26 I&N Dec. 147 (BIA 2013).

21 42. Moreover, following enactment of the IIRIRA, EOIR drafted regulations explaining
 22 that, in general, non-citizens who entered the country without inspection were not considered
 23 detained under 8 U.S.C. § 1225. *See* Inspection and Expedited Removal of Aliens, Detention and
 24 Removal of Aliens, Conduct of Removal Proceedings, Asylum Procedures, 62 Fed. Reg. 10312,
 10323 (Mar. 6, 1997). Rather, such non-citizens were instead detained under § 1226(a). *See id.*

25 43. Immigration detention should not be used as a punishment and should only be used
 26 when, under an individualized determination, a noncitizen is a flight risk because they are unlikely
 27

1 to appear for immigration court or a danger to the community. *Zadvydas v. Davis*, 533 U.S. 678,
2 690 (2001).

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

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

14 FACTUAL BACKGROUND

15 46. Petitioner is 34-year-old citizen and national of Guatemala.

16 47. Mr. Castillo fears persecution in Guatemala on account of his account his former
17 involvement in the Guatemalan Army, and as a result of that involvement, received threats from a
18 narcotrafficker. Mr. Castillo has also suffered sexual harassment, child exploitation, and criminal
19 violence, which led him to leave Guatemala.

20 48. Petitioner has been diagnosed with [REDACTED]

21 [REDACTED] The government has filed his
22 medical records with these diagnosis to the immigration court. While in detention, these conditions
23 have continued to affect Petitioner’s mental and emotional well-being, including heightened
24 anxiety, depression, emotional instability, and trauma-related symptoms. The detention environment
25 has exacerbated these diagnoses by limiting access to consistent treatment, therapeutic support, and
26 stabilizing conditions necessary for effective management of Petitioner’s mental health.

27 49. The DHS started this removal proceeding on or about February 15, 2026.

28 50. Respondents alleged he was inadmissible to the United States under 8 U.S.C. §
1182(a)(6)(A)(i) and commanded him to appear for a hearing on February 26, 2026, in the
immigration court in Otay Mesa, California. He has attended all hearings. The immigration court
has conducted a competency hearing under Matter of MAM, found that petitioner is competent, but

1 acknowledged his multiple diagnosis, [REDACTED] and
2 need for daily medication. DHS also provided notice as to petitioner being of the *Franco-Gonzalez*
3 Class Membership.

4 51. Petitioner is illiterate and in the process of filing for relief with the immigration
5 court.

6 **CAUSES OF ACTION**

7 **COUNT ONE**

8 **Violation of Fifth Amendment Right to Due Process – Substantive and Procedural Due
9 Process, U.S. Const. Amend. V.**

10 52. Petitioner restates, realleges, and incorporates by reference each and every allegation
11 in the paragraphs above as if fully set forth herein.

12 53. The Due Process Clause of the Fifth Amendment to the U.S. Constitution prohibits
13 the federal government from depriving any person of “life, liberty, or property, without due process
14 of law.” U.S. Const. Amend. V. Due process protects “all ‘persons’ within the United States,
15 including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent.”
16 *Zadvydas*, 533 U.S. at 693.

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

19 55. While asylum is a discretionary benefit, the right to apply is not. 8 U.S.C. §
20 1158(a)(1). Any noncitizen who is “physically present in the United States or who arrives in the
21 United States (whether or not at a designated port of arrival . . .), irrespective of such [noncitizen’s]
22 status, may apply for asylum.” *Id.*

23 56. Because the denial of the right to apply for asylum can result in serious harm or
24 death, the statutory right to apply is robust and meaningful. It includes the right to legal
25 representation, and notice of that right, *see id.* §§ 1229a(b)(4)(A), 1362, 1158(d)(4); the right to
26 present evidence in support of asylum eligibility, *see id.* § 1158(b)(1)(B); the right to appeal an
27 adverse decision to the Board of Immigration Appeals and to the federal circuit courts, *see id.* §§
28 1229a(c)(5), 1252(b); and the right to request reopening or reconsideration of a decision
determining removability, *see id.* § 1229a(c)(6)-(7).

57. In sum, applying for asylum in removal proceedings comes with a panoply of greater
protections when compared with seeking asylum in expedited removal. *See Immigrant Defenders*

1 *Law Center v. Mayorkas*, 2023 WL 3149243, at *29 (C.D. Cal. Mar. 15, 2023) (“Individuals in
2 regular removal proceedings enjoy far more robust due process protections [than those in expedited
removal] because Congress has conferred additional statutory rights on them.”).

3 58. Moreover, Mr. Castillo has a vital liberty interest in being free from DHS custody.
4 *See Pinchi v. Noem*, No. 5:25-CV-05632-PCP, 2025 WL 2084921, at *4 (N.D. Cal. July 24, 2025)
5 (citing *Diaz v. Kaiser*, No. 3:25-CV-05071, 2025 WL 1676854 (N.D. Cal. June 14, 2025)
6 (explaining that a non-citizen that ICE released from custody after initial apprehension “has a
7 substantial private interest in remaining out of custody” which includes an interest in “...obtaining
8 necessary medical care, [and] maintaining her relationships in the community...”).

9 59. His length of residence, namely having lived in the U.S. for over 13 years, and ties to
10 the community create a heightened liberty interest, and therefore Mr. Castillo is entitled to
meaningful process in the form of a bond hearing.

11 COUNT TWO

12 **Violation of the Fourth Amendment of the Constitution**

13 60. Petitioner restates, realleges, and incorporates by reference each and every allegation
14 in the paragraphs above as if fully set forth herein.

15 61. The Fourth Amendment protects “[t]he right of the people to be secure in their
16 persons . . . against unreasonable searches and seizures.” U.S. Const. amend. IV. The Supreme
17 Court has recognized that immigration arrests and detentions are “seizures” within the meaning of
18 the Fourth Amendment. *INS v. Lopez-Mendoza*, 468 U.S. 1032, 1044 (1984) (acknowledging that
19 deportation proceedings are civil, but the Fourth Amendment still applies to the “seizure” of the
person).

20 62. The Fourth Amendment requires that arrests entail a neutral, judicial determination
21 of probable cause. *See Gerstein v. Pugh*, 420 U.S. 103, 114 (1975). That neutral, judicial
22 determination can occur either before the arrest, in the form of a warrant, or promptly afterward, in
23 the form of a prompt judicial probable cause determination. *See id.* Arrest and detention of a person,
24 including of a noncitizen, absent a neutral judicial determination of probable cause violates the
25 Fourth Amendment of the Constitution. *Id.*; *see also Cnty. of Riverside v. McLaughlin*, 500 U.S. 44,
26 57 (1991). This determination must occur within 48 hours of detention, which includes weekends,
27 unless there is a bona fide emergency or other extraordinary circumstances. *See Cnty. of Riverside*
v. McLaughlin, 500 U.S. 44, 57 (1991). This did not happen in petitioner’s case.

63. Congress enacted a strong preference that immigration arrests be based on warrants. *See Arizona v. United States*, 567 U.S. 387, 407–08 (2012). The Immigration and Nationality Act thus provides immigration officers with only limited authority to conduct warrantless arrests. 8 U.S.C. § 1357(a)(2). Federal regulations track the strict limitations on warrantless arrests. *See* 8 C.F.R. § 287.8(c)(2)(ii).

64. Mr. Castillo, at the moment of his arrest and detention by Respondents, did not receive any judicial determination of probable cause for his arrest or continued detention by Respondents.

65. The Government cannot salvage this seizure by invoking generalized immigration enforcement interests. The Fourth Amendment’s reasonableness inquiry is fact-specific and demands individualized justification for both the arrest and the extended detention. *See United States v. Brignoni-Ponce*, 422 U.S. 873, 882–84 (1975); *Gerstein*, 420 U.S. at 114. Mr. Castillo does not pose any danger to any person in the community at large.

66. Respondents’ warrantless arrest of Mr. Castillo constitutes an unreasonable and unlawful seizure in violation of the Fourth Amendment.

COUNT THREE

Violation of Fifth Amendment Right to Due Process – Procedural Due Process, U.S. Const. Amend. V.

67. Petitioner restates, realleges, and incorporates by reference each and every allegation in the paragraphs above as if fully set forth herein.

68. 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 (2001).

69. Mr. Castillo has a fundamental interest in liberty and being free from official restraint.

70. The government’s detention of Petitioner without a notice or an opportunity to be heard before detention violates his right to due process.

71. The government’s detention of Petitioner without a meaningful bond and custody redetermination hearing to determine whether he is a flight risk or danger to others violates his right to 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 refusal to allow Petitioner a meaningful bond and custody redetermination hearing violates the INA, APA, and Due Process;
- (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 this district without the Court's approval;
- (7) Issue an Order requiring Respondents to provide a bond and custody redetermination hearing within 14 days to meaningfully consider his eligibility for release from DHS custody;
- (8) Grant such further relief as the Court deems just, equitable, and appropriate; and
- (9) Grant any and all other further relief this Court deems just or proper.

Dated: April 21, 2026

Respectfully submitted,

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