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Attorney for Petitioner,

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

Angel Didier Deagueros Mota,
Petitioner,

) Case No. '26CV2830 JLS MMP

V.

TODD BLANCHE, Acting Attorney General of the United States, in his official capacity; **MARKWAYNE MULLIN**, Secretary of the U.S. Department of Homeland Security, in his official capacity; **EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**; **TODD LYONS**, Acting Director of U.S. Immigration and Customs Enforcement, in his official capacity; **GREGORY J. ARCHAMBEAULT**, ICE Field Office Director for Imperial County, in his official capacity, **WARDEN** of Imperial Regional Detention Facility.

PETITION FOR WRIT OF
HABEAS CORPUS AND
COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF

Respondents.

INTRODUCTION

1. Petitioner Angel Didier Deagueros-Mota is currently confined in prolonged

1 immigration detention by the Department of Homeland Security (“DHS”) pursuant
2 to 8 U.S.C. § 1231 following reinstatement of a prior removal order. He has not
3 received a constitutionally adequate custody hearing before a neutral decision-
4 maker. His continued detention violates the Immigration & Nationality Act
5 (“INA”), 8 U.S.C. §§ 1231(a)(1)–(3), and the Fifth Amendment Due Process
6 Clause because he has accrued more than six months of post-removal detention,
7 because he has accrued more than six months of post-removal detention and
8 judicial review remains pending under a court-ordered stay, there is no significant
9 likelihood of removal in the reasonably foreseeable future. Moreover, the criminal
10 conviction that formed the basis of the underlying removal order has now been
11 vacated and dismissed in its entirety, further eliminating any realistic prospect of
12 removal under *Zadvydas v. Davis*, 533 U.S. at 699.
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14
15 2. Petitioner is a 39-year-old native and citizen of Mexico who has lived in the
16 United States since early childhood. He is the husband of a United States citizen,
17 the father of three United States citizen minor children, the son of a United States
18 citizen mother, and the brother of two United States citizen siblings. Nearly his
19 entire life, family, and community ties are rooted in the United States.
20

21 3. In March 2025, Petitioner was taken into federal criminal custody on an
22 alleged illegal re-entry charge. The criminal case was later dismissed, and he was
23 transferred to immigration authorities. DHS reinstated a prior removal order under
24 8 U.S.C. § 1231(a)(5). Petitioner immediately expressed a fear of return to Mexico.
25 The IJ affirmed a negative reasonable fear. He sought judicial review of the
26 reinstatement order. That petition for review remains pending before the United
27 States Court of Appeals for the Ninth Circuit.
28

1 4. On April 30, 2025, the Ninth Circuit granted a stay of removal. Despite that
2 binding judicial order, Immigration and Customs Enforcement (“ICE”) removed
3 Petitioner to Mexico later that same day. Following further litigation, the
4 Government ordered his return. In August 2025, Petitioner was paroled back into
5 the United States pursuant to that directive and immediately returned to
6 immigration custody, where he remains detained.
7

8 5. Petitioner has now been subjected to more than six months of aggregate
9 immigration detention arising from the same reinstated removal proceedings
10 beginning in March 2025. Because removal cannot occur while judicial review
11 remains pending under a court-ordered stay, and because the legal basis for the
12 underlying removal order has now been vacated, there is no significant likelihood
13 of removal in the reasonably foreseeable future. His continued confinement
14 therefore exceeds the constitutional limits recognized in *Zadvydas v. Davis*, 533
15 U.S. 678 (2001).
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18 6. On May 1, 2026, a Superior Court Judge granted Petitioner’s motion to
19 vacate his prior criminal conviction, and the prosecution dismissed the charges in
20 their entirety. That conviction formed the basis of the underlying removal order
21 upon which the current reinstatement order rests. Its vacatur materially alters
22 Petitioner’s removability and opens viable avenues to challenge the underlying
23 removal order and pursue lawful status, including adjustment of status.
24

25 7. This Petition is a renewed habeas action filed following the denial without
26 prejudice of Petitioner’s prior petition. This filing is based on materially changed
27 circumstances that did not exist at the time of the prior action. Specifically, on May
28 1, 2026, the state court vacated the criminal conviction that formed the basis of the

1 underlying removal order, and the prosecution dismissed the charges in their
2 entirety. As a result, the legal foundation supporting the reinstated removal order
3 has been fundamentally altered, and Petitioner now has viable avenues to challenge
4 the underlying removal order and pursue lawful status. These changed
5 circumstances further confirm that removal is not reasonably foreseeable and
6 render Petitioner's continued detention unlawful under *Zadvydas v. Davis*.

8 8. Because DHS continues to detain Petitioner without providing a meaningful
9 opportunity to challenge his confinement before a neutral adjudicator, habeas relief
10 under 28 U.S.C. § 2241 is warranted. Petitioner respectfully requests immediate
11 release or, in the alternative, a prompt constitutionally adequate bond hearing at
12 which the Government bears the burden of justifying continued detention by clear
13 and convincing evidence.
14

15 JURISDICTION

16 9. This action arises under the Constitution of the United States and the
17 Immigration and Nationality Act (INA), 8 U.S.C. § 1101 et. seq.
18

19 10. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas
20 corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United
21 States Constitution (Suspension Clause) the Fourth and Fifth Amendments to the
22 U.S. Constitution, and 5 U.S.C. §§ 701-706 (Administrative Procedure Act).
23

24 11. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. §
25 2241 et. seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et. seq., and the All
26 Writs Act, 28 U.S.C. § 1651.
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1 12. In *Constantinovici v. Bondi*, Case No. 3:25-cv-02405-RBM-AHG
2 (S.D.Cal.Oct. 10, 2025), this Court held that § 2241 jurisdiction exists over habeas
3 challenges to post-order detention independent of the underlying removal order.
4

5 **VENUE**

6 13. Venue is proper in this district and division pursuant to 28 U.S.C. § 2241(a)
7 and 28 U.S.C. § 1391(b)(2) and (e)(1) because Mr. Deagueros is physically
8 detained within this district.
9

10 14. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e)
11 because Respondents are employees, officers, and agencies of the United States,
12 and because a substantial part of the events or omissions giving rise to the claims
13 occurred in the Southern District of California.
14

15 **REQUIREMENTS OF 28 U.S.C. § 2243**

16 15. The Court must grant the petition for writ of habeas corpus or issue an order
17 to show cause (OSC) to the Respondents “forthwith,” unless Petitioner is not
18 entitled to relief. 28 U.S.C. § 2243. If an OSC is issued, the Court must require
19 Respondents to file a return “within three days unless for good cause additional
20 time, not exceeding twenty days, is allowed.” *Id.*
21

22 16. Habeas corpus is “perhaps the most important writ known to the
23 constitutional law . . . affording as it does a swift and imperative remedy in all
24 cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963).
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1 “The application for the writ usurps the attention and displaces the calendar of the
2 judge or justice who entertains it and receives prompt action from him within the
3 four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir.
4 2000) (citation omitted); *see also Van Buskirk v. Wilkinson*, 216 F.2d 735, 737–38
5 (9th Cir. 1954) (Habeas corpus is “a speedy remedy, entitled by statute to special,
6 preferential consideration to insure expeditious hearing and determination.”).

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9 17. Mr. Deagueros is “in custody” for the purpose of 28 U.S.C. § 2241 because
10 he is in Respondents’ custody at the Imperial Regional Detention Facility.

11 PARTIES

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13 17. Angel Didier Deagueros Mota is an adult citizen of Mexico. He has a
14 pending Petition for Review before the Ninth Circuit Court of Appeals. He has a
15 U.S.C. wife, and three U.S.C. minor children. He has multiple approved petitions,
16 (I-130/I-360) and is now *prima facie* eligible for adjustment of status. He is
17 presently in custody of Immigration and Customs Enforcement (ICE) at the
18 Imperial Regional Detention Facility, 1572 Gateway Rd, Calexico, CA 92231.
19

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21 18. Respondent Gregory J. Archambeault is the Field Office Director for ICE’s
22 San Diego and Imperial Field Office. The Imperial Field Office is responsible for
23 local custody decisions relating to noncitizens charged with being removable from
24 the United States. The Imperial Field Office’s area of responsibility includes San
25 Diego and Imperial County in California. Respondent Archambeault is a legal
26 custodian of Mr. Deagueros and is sued in his official capacity.
27

28 19. Respondent Warden of the Imperial Regional Detention Facility is

1 Petitioner's immediate custodian and is sued in his official capacity.

2 20. Respondent Todd M. Lyons is the Acting Director of ICE. As the Senior
3 Official Performing the Duties of the Director of ICE, he is responsible for the
4 administration and enforcement of the immigration laws of the United States,
5 routinely transacts business in this District, and is legally responsible for pursuing
6 any effort to detain and remove Mr. Deagueros. Respondent Lyons is sued in his
7 official capacity.
8

9 21. Respondent Markwayne Mullin is the Secretary of the Department of
10 Homeland Security and is sued in her official capacity. She is responsible for the
11 implementation and enforcement of the Immigration and Nationality Act (INA),
12 and oversees ICE, which is responsible for Petitioner's detention. Mr. Mullin has
13 ultimate custodial authority over Petitioner and is sued in his official capacity.
14

15 22. Respondent Todd Blanche is the Acting Attorney General of the United
16 States, and as such has authority over the Department of Justice. He is sued in his
17 official capacity.
18

19 23. Respondent U.S. Department of Homeland Security is the federal agency
20 that has authority over the actions of ICE.
21

22 **FACTUAL BACKGROUND**

23 24. Petitioner Angel Didier Deagueros-Mota was born on  in
24 Iguala, Guerrero, Mexico. In approximately 1990, when he was five years old, he
25 was brought to the United States by his mother and has resided primarily in this
26 country since that time. Petitioner and his mother lived with his stepfather, who at
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28

1 the time was a lawful permanent resident and later naturalized as a United States
2 citizen. During Petitioner's childhood, his stepfather subjected both Petitioner and
3 his mother to physical and emotional abuse. As a result of that abuse, Petitioner's
4 mother filed a self-petition under the Violence Against Women Act ("VAWA"),
5 listing Petitioner as a derivative beneficiary. The Form I-360 petition was approved
6 in 2002 and remains approved as to Petitioner. Petitioner's mother later adjusted
7 status to lawful permanent resident in 2018 and naturalized in 2024.
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11 25. In approximately 2000, while still a minor, Petitioner traveled with his
12 mother to Mexico. Upon returning to the United States through the pedestrian
13 inspection line at the San Ysidro Port of Entry, Petitioner was waived through
14 inspection without questioning or presentation of documentation. His mother was
15 denied entry. On January 10, 2005, when Petitioner was nineteen years old and
16 unrepresented by counsel, he was served with a Notice to Appear alleging entry
17 without inspection. He waived appeal, and the removal order became final on
18 January 20, 2005. He was removed shortly thereafter. In April 2005, Petitioner
19 returned to the United States through the vehicle passenger lanes at the San Ysidro
20 Port of Entry and was again waived through inspection.
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25 26. In approximately 2003 or 2004, when he was eighteen years old, Petitioner
26 sustained a criminal conviction which lead to his underlying removal order. This
27 conviction has been dismissed in its entirety allowing the underlying removal order
28

1 to be challenged. This opens Petitioner's eligibility for Adjustment of Status to a
2 Lawful Permanent Resident.
3

4 27. On or about March 22, 2010, Petitioner filed a Form I-212, Application for
5 Permission to Reapply for Admission After Removal. Despite multiple inquiries,
6 the status of that application remains unknown. On February 25, 2011, Petitioner's
7 United States citizen spouse obtained approval of a Form I-130 immigrant visa
8 petition on his behalf. Petitioner therefore has both an approved immediate relative
9 petition and an approved VAWA-based petition providing potential pathways to
10 lawful permanent residence.
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14 28. In March 2025, Petitioner was taken into federal criminal custody and
15 charged with illegal re-entry under 8 U.S.C. § 1326. Those criminal charges were
16 subsequently dismissed, and he was transferred to the custody of the Department of
17 Homeland Security. DHS reinstated his prior removal order pursuant to 8 U.S.C. §
18 1231(a)(5). Petitioner immediately expressed a fear of return to Mexico and was
19 referred for reasonable fear proceedings. An asylum officer issued a negative
20 reasonable fear determination.
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24 29. The Petitioner timely sought review of the reinstatement of removal order
25 and his petition for review remains pending before the United States Court of
26 Appeals for the Ninth Circuit.
27

28 30. On April 29, 2025, Petitioner filed a Petition for Review with the Ninth

1 Circuit and sought a stay of removal. On April 30, 2025, at approximately 7:16
2 a.m., the Ninth Circuit granted the stay. Despite that binding judicial order,
3
4 Immigration and Customs Enforcement removed Petitioner to Mexico later that
5 same day at approximately 3:00 p.m. Following further litigation, the Government
6
7 ordered Petitioner returned to the United States. In August 2025, Petitioner was
8
9 paroled back into the country pursuant to that government order and immediately
10 returned to immigration custody.

11 31. Petitioner was first detained in March 2025. Although he was unlawfully
12 removed in April 2025, he was returned to the United States in August 2025 and
13
14 has remained continuously detained since that time. In aggregate, Petitioner has
15 now been subjected to more than six months of immigration detention arising from
16
17 the same reinstated removal proceedings and ongoing judicial review. He remains
18 detained while his Ninth Circuit proceedings are pending and has not been
19
20 afforded a constitutionally adequate bond hearing before a neutral adjudicator at
21
22 which the Government bears the burden of justifying his continued confinement.

23 **LEGAL FRAMEWORK**

24 32. The Due Process Clause of the Fifth Amendment provides Mr. Deagueros
25 with important protections regarding his detention. As the Supreme Court has
26 explained, “[f]reedom from imprisonment—from government custody, detention,
27 or other forms of physical restraint—lies at the heart of the liberty” that the Due
28 Process Clause protects. *Zadvydas*, 533 U.S. at 690.

1 33. In *Zadvydas*, the Supreme Court held that post-removal-order detention
2 under § 1231(a)(6) is limited by constitutional principles and may not continue
3 beyond a period reasonably necessary to secure removal. The Court recognized six
4 months as the point at which detention becomes presumptively unreasonable
5 absent a significant likelihood of removal in the reasonably foreseeable future. *Id.*
6 at 701.
7

8 34. Although *Zadvydas* does not impose a rigid six-month limit, once detention
9 exceeds that benchmark and removal is not reasonably foreseeable, continued
10 confinement violates due process.
11

12 35. Prolonged immigration detention may also violate due process when it
13 becomes unreasonable in relation to its regulatory purposes and when adequate
14 procedural safeguards are absent. See *Singh v. Holder*, 638 F.3d 1196, 1203 (9th
15 Cir. 2011) (requiring clear and convincing evidence standard in immigration bond
16 proceedings).
17

18 36. In the immigration context, the Supreme Court has recognized two primary
19 purposes for civil detention: to mitigate the risks of danger to the community and
20 to prevent flight. See *Zadvydas*, 533 U.S. at 690; *Demore v. Kim*, 538 U.S. 510,
21 528 (2003).
22

23 37. The Due Process clause prohibits deprivations of life, liberty, and property
24 without due process of law. U.S. Const. amend. V. Due process rights extend to
25 noncitizens present in the United States, including those subject to final removal
26 orders. *Zadvydas*, 533 U.S. at 693–94; see *Trump v. J.G.G.*, 604 U.S. 670, 673
27 (2025) (“ ‘It is well established that the Fifth Amendment entitles aliens to due
28 process of law’ in the context of removal proceedings.” (quoting *Reno v. Flores*,

1 507 U.S. 292, 306 (1993)). The fundamental requirements of procedural due
2 process are that a person be afforded notice and opportunity to be heard “at a
3 meaningful time and in a meaningful manner.” *Mathews v. Eldridge*, 424 U.S. 319,
4 333 (1976).
5

6 38. Section 1231 governs the arrest and detention of noncitizens who have been
7 ordered removed. See 8 U.S.C. § 1231. This statute directs the Attorney General of
8 the United States to effect the removal of a noncitizen from this country “within a
9 period of 90 days,” also known as the “removal period.” § 1231(a)(1). It also
10 authorizes detention of the noncitizen during this removal period. § 1231(a)(2).
11 However, once that time passes and after “removal is no longer reasonably
12 foreseeable, continued detention is no longer authorized by statute,” and the
13 noncitizen must be released. *Zadvydas*, 533 U.S. at 699–700; see 8 U.S.C. §
14 1231(a)(3) (“If the alien does not leave or is not removed within the [90-day]
15 removal period, the alien, pending removal, shall be subject to supervision under
16 regulations prescribed by the Attorney General.”).
17
18

19 CLAIM FOR RELIEF

20 Violation of Fifth Amendment Due Process

21 39. The Due Process Clause of the Fifth Amendment to the U.S. Constitution
22 prohibits the federal government from depriving any person of “life, liberty, or
23 property, without due process of law.” U.S. Const. Amend. V. Due process
24 protects all ‘persons’ within the United States, including [non-citizens], whether
25 their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533
26 U.S. at 693.
27

28 40. What due process protections apply depend on the situation and accounts for

1) the private interest at issue, 2) the risk of erroneous deprivation of that interest through the procedures used, and 3) the Government's interest. *Mathews v. Eldridge*, supra, 424 U.S. at 334-35.

41. Detention constitutes "a loss of liberty that is . . . irreparable." *Moreno Galvez v. Cuccinelli*, 492 F. Supp. 3d 1169, 1181 (W.D. Wash. 2020) (*Moreno II*), aff'd in part, vacated in part on other grounds, remanded sub nom. *Moreno Galvez v. Jaddou*, 52 F.4th, 821 (9th Cir. 2022). It "is well established that the deprivation of constitutional rights unquestionably constitutes irreparable injury." *Melendres v. Arpaio*, 695 F.3d 990, 1002 (9th Cir. 2012) (citation modified); *Warsoldier v. Woodford*, 418 F.3d 989, 1001-02 (9th Cir. 2005).

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

43. Mr. Deaguero's detention, which has now lasted over six months, constitutes prolonged detention and is not reasonably related to a legitimate government purpose.

44. To justify Mr. Deaguero's ongoing prolonged detention, due process requires an individualized hearing before a neutral decision-maker where the government must establish that continued detention is justified by clear and convincing evidence of flight risk or danger and that no alternatives to detention could sufficiently mitigate any risk that does exist.

45. Accordingly, Mr. Deaguero's prolonged detention violates the Due Process Clause of the Fifth Amendment.

CLAUSE II

Violation of the Due Process Clause of the Fifth Amendment

Unconstitutional Re-Detention and Continued Confinement Under 8 U.S.C.

§1231 (INA § 241)

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

1 47. Petitioner's removal order became administratively final on January 20,
2 2005, and he was removed shortly thereafter. Following that removal, Petitioner
3 later re-entered the United States through a Port of Entry and thereafter resided in
4 the United States for many years without immigration detention.

5 48. In March 2025, Petitioner was taken into federal criminal custody on
6 allegations of illegal re-entry. Those criminal charges were dismissed, and
7 Petitioner was transferred directly into the custody of the Department of Homeland
8 Security. DHS reinstated his prior removal order pursuant to 8 U.S.C. § 1231(a)(5).

9 49. Petitioner does not dispute that DHS possessed statutory authority to take
10 him into immigration custody upon transfer from federal criminal detention.
11 However, once detained under INA § 241, the Government's authority is limited
12 by both statute and the Constitution.

13 50. Detention during the ninety-day "removal period" is mandatory pursuant to
14 INA § 241(a)(2), 8 U.S.C. § 1231(a)(2). Once that removal period expires,
15 detention authority arises solely under INA § 241(a)(6), which permits only
16 discretionary detention or supervision subject to constitutional constraints.

17 51. In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court held that
18 INA § 241(a)(6) must be construed to avoid serious constitutional concerns arising
19 from prolonged or potentially indefinite civil detention. Post-removal-period
20 detention is permissible only for a period reasonably necessary to effectuate
21 removal and becomes constitutionally impermissible where there is "no significant
22 likelihood of removal in the reasonably foreseeable future." *Id.* at 690.

23 52. Following reinstatement of his removal order, Petitioner expressed a fear of
24 return to Mexico and pursued available remedies. Petitioner sought judicial review
25 of the reinstatement order before the United States Court of Appeals for the Ninth
26 Circuit, where proceedings remain pending. The pendency of judicial review and
27 associated stay of removal presently prevents execution of removal and renders
28 continued detention untethered to any immediate removal objective.

1 53. Petitioner's liberty interest is substantial. After execution of his original
2 removal order in 2005, Petitioner re-entered the United States through the San
3 Ysidro Port of Entry, where he presented himself for inspection and was waved
4 through by an immigration officer without questioning or documentation (a
5 waived-through inspection consistent with *Matter of Quilantan*, 25 I. & N. Dec.
6 285 (BIA 2010)). Petitioner thereafter resided openly in the United States for many
7 years without immigration detention, during which time he established deep family
8 and community ties, married a United States citizen, and pursued available
9 immigration remedies. This extended period of settled liberty strengthens his
10 constitutionally protected interest in freedom from physical restraint. *See*
11 *Zadvydas*, 533 U.S. at 690; *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972).

12 54. The Constitution prohibits the Government from imposing prolonged civil
13 detention without adequate procedural safeguards once a substantial liberty interest
14 is implicated. At a minimum, due process requires notice and an individualized
15 determination by a neutral decisionmaker that detention is necessary based on
16 danger to the community or risk of flight. *See Mathews v. Eldridge*, 424 U.S. 319,
17 335 (1976).

18 55. Petitioner has not received a constitutionally adequate hearing before a
19 neutral decisionmaker at which the Government bears the burden of justifying
20 continued detention. Instead, he remains confined while his Ninth Circuit
21 proceedings are pending and removal remains legally suspended.

22 56. Federal regulations governing post-order detention reflect these
23 constitutional limitations and require procedural safeguards when liberty is
24 curtailed. *See* 8 C.F.R. §§ 241.4 and 241.13. Civil detention must remain
25 reasonably related to effectuating removal and may not become punitive or
26 indefinite in effect.

27 57. Petitioner has now endured more than six months of aggregate immigration
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1 detention arising from the same reinstated removal proceedings and ongoing
2 judicial review. Because removal is not reasonably foreseeable and because the
3 Government has failed to provide constitutionally sufficient process to justify
4 continued confinement, his detention has become excessive and unlawful under the
5 Fifth Amendment. The existence of a judicial stay of removal, combined with the
6 vacatur of the conviction underlying the removal order, eliminates any realistic
7 timeline for execution of removal and confirms that continued detention is not
8 reasonably related to its purported purpose.

9 58. Accordingly, Respondents' continued detention of Petitioner violates the
10 Due Process Clause. Petitioner is entitled to immediate release from custody or, at
11 minimum, a prompt constitutionally adequate bond hearing at which the
12 Government bears the burden of proving that continued detention is necessary.

13 14 **PRAYER FOR RELIEF**

15 WHEREFORE, Petitioner Angel Didier Deagueros-Mota respectfully requests that
16 this Court:
17

- 18 1. Assume jurisdiction over this matter;
- 19 2. Issue an Order to Show Cause pursuant to 28 U.S.C. § 2243;
- 20 3. Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner
21 immediately, or in the alternative to provide within seven (7) days a
22 constitutionally adequate bond hearing before an Immigration Judge at
23 which DHS bears the burden of proving by clear and convincing evidence
24 that continued detention is necessary and that no less restrictive alternatives
25 can mitigate any risk;
26
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- 1 4. Declare that Petitioner's continued detention without an individualized
- 2 determination before a neutral decisionmaker violates the Due Process
- 3 Clause of the Fifth Amendment;
- 4
- 5 5. Enjoin Respondents from transferring Petitioner outside this district without
- 6 prior Court approval; and
- 7
- 8 6. Grant such other and further relief as the Court deems just and proper.

9 Dated: May 4, 2026

10 Respectfully submitted,

11
12 /s/LeRoy George Siddell
13 LeRoy George Siddell

14 Attorney for Petitioner

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16
17 VERIFICATION OF COUNSEL

18 I, LeRoy George Siddell, hereby certify that I am familiar with the case of the
19 named Petitioner and that the facts as stated above are true and correct to the best
20 of my knowledge and belief.

21
22 s/LeRoy George Siddell
23 attorneysiddell@yahoo.com

EXHIBIT LIST

- A . Advanced Parole Document to execute return to United States
- B. Motion for Return of Petitioner to the United States and to Enforce Stay of Removal
- C. Approved I-360, Self-Petitioner VAWA, derivative
- D. Approved I-130, Spouse of U.S. Citizen
- E. Pending I-212, Application for Permission to Reapply for Admission
- F. Minute Order, Superior Court of California (05.01.2026)
- G. Findings and Order Defendant's Motion to Vacate (04.10.2026)