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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

Angel Jesus Lucas Gregorio,

Petitioner,

vs.

CHRISTOPHER J. LAROSE, warden of Otay Mesa Detention Center; JESUS ROCHA, Acting San Diego Field Office Director, Enforcement and Removal Operations; DAVID J. VENTURELLA, Acting Director of U.S. Immigration & Customs Enforcement; MARKWAYNE MULLIN, Secretary of Homeland Security,

Respondents.

Case No.: '26CV3918 RBM SBC

PETITION FOR WRIT OF HABEAS CORPUS & ORDER TO SHOW CAUSE WITHIN THREE DAYS

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

INTRODUCTION

1. Petitioner Angel Jesus Lucas Gregorio has been residing in the United States since March of 2021 and was apprehended by immigration authorities on Monday, June 22, 2026 in Encinitas, California while he was on his way to work.

2. Petitioner is currently detained at the Otay Mesa Detention Center by immigration authorities and is the subject of pending removal proceedings. Ex. A.

3. Petitioner is charged with having entered the United States without being admitted or paroled. 8 U.S.C. § 1182(a)(6)(A)(i). Ex. A.

4. Petitioner was denied release by the Department of Homeland Security (DHS) and sought a bond redetermination hearing before an immigration judge. To date, he has not received a bond hearing and Respondents will continue to deprive him of same on the grounds that he is not eligible for a bond hearing due to a lack of jurisdiction under the Board of Immigration Appeals' decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).

5. Petitioner is being held without lawful authority for two reasons.

6. First, Respondents have no statutory authority to detain Petitioner without affording him any due process of law. The Executive Office for Immigration Review (EOIR)'s current position, as reflected in *Matter of Yajure Hurtado* and the current pattern and practice of the Otay Mesa Immigration Court, is that noncitizens who entered without inspection are categorically ineligible for bond because they are detained under 8 U.S.C. §1225(b)(2)(A). This Petition challenges that interpretation and its application to Petitioner. 8 U.S.C. § 1225(b)(2)(A) states that an applicant seeking admission shall be detained for a removal proceeding. Respondents, relying on *Matter of Yajure Hurtado*, continue to treat 8 U.S.C. § 1225(b)(2)(A) as applying to all individuals who arrived in the

United States without valid immigration documents, regardless of how long they have lived in the United States and regardless of how far they were apprehended from the border.

7. However, Judges of this Court have repeatedly found that 8 U.S.C. § 1225(b)(2)(A) does not apply to individuals, like Petitioner, who are already physically present in the United States. *See, e.g., Ramirez v. Mullin*, Case No.: 3:26-cv-01880-RBM-VET, 2026 at *2-3 citing *Silvestre-Mendoza v. Noem*, Case No.: 3:25-cv-03206-RBM-DDL,2025 WL 3512410, at *1-2 (S.D.Cal. Dec.8, 2025). In *Silvestre-Mendoza v. Noem*, the Court found that "'a proper understanding of the relevant statutes, in light of their plain text, overall structure, and . . . case law interpreting them, compels the conclusion that § 1225's provisions for mandatory detention of noncitizens seeking admission [do] not apply to someone like [petitioner],' who has been residing in the United States" for several years. *Id.* at *1 (quoting *Lopez Benitez v. Francis*, 795 F. Supp. 3d 475, 484 (S.D.N.Y. 2025)).

8. Petitioner was detained on June 22, 2026, after having resided in the United States for more than five years. If any statutory authority for Petitioner's detention exists at all, then it must be the discretionary detention procedures of 8 U.S.C. § 1226 that govern Petitioner's detention.

9. Moreover, immediate release, rather than a bond hearing, is the appropriate remedy. As this Court has repeatedly recognized, a post-deprivation bond hearing cannot remedy an unlawful deprivation of liberty that has already occurred. *See Miranda Guevara v. Mullin*, Case No.: 3:26-cv-02690-RBM-AHG at 3 (S.D. Cal. May 14, 2026); *Ramirez v. Mullin*, Case No.: 3:26-cv-01880-RBM-VET (S.D. Cal. Apr. 9, 2026); *Perez Solis v. LaRose*, Case No.: 3:26-cv-01532-RBM-AHG (S.D. Cal. Mar. 26, 2026); *Arias Torres v. LaRose*, Case No.: 3:26-cv-01532-RBM-BJW (S.D. Cal. Mar. 26, 2026); *Rodas-Dieguez v. Noem*, Case No.:

3:26-cv-00976-RBM-MMP (S.D. Cal. Feb. 26, 2026).

10. Second, Petitioner is the subject of an unlawful warrantless arrest where no assessment was done as to whether he is likely to escape before a warrant could be obtained. 8 U.S.C. § 1357(a)(2). As the statute was violated, Petitioner's continued detention is unlawful and, again, immediate release is required.

JURISDICTION AND VENUE

11. This Court has jurisdiction under 28 U.S.C. § 2241 (federal habeas statute); 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 2201-2 (declaratory judgment); United States Constitution Article 1, Section 9 (Suspension Clause).

12. Venue properly lies within the Southern District of California under 28 U.S.C. § 1391 because this is a civil action in which Respondents are agencies of the United States, Petitioner is detained in this District, and a substantial part of the events and omissions giving rise to this action occurred in the District.

PARTIES

13. Petitioner Angel Jesus Lucas Gregorio is in pending removal proceedings and is currently detained at the Otay Mesa Detention Center in Otay Mesa, California. Ex. A, B.

14. Respondent Christopher LaRose is the Warden of the Otay Mesa Detention Center where Petitioner is detained. He has immediate physical custody of Petitioner and is sued in his official capacity.

15. Respondent Jesus Rocha is the Acting Director of the San Diego Field Office of ICE's Enforcement and Removal Operations division. As such, he is the custodian of all persons held at the ICE facilities in San Diego. He is Petitioner's immediate custodian and is responsible for his detention. He is sued in his official capacity.

16. Respondent David J. Venturella is the Acting Director of ICE and has authority over the operations of ICE. In that capacity and through his agents,

Respondent Venturella has broad authority over the operation and enforcement of the immigration laws. Respondent Venturella is sued in his official capacity.

17. Respondent Markwayne Mullin is the Secretary of the Department of Homeland Security. He is responsible for the implementation and enforcement of the Immigration and Nationality Act and oversees ICE, which is responsible for Petitioner's detention. Respondent Mullin has ultimate custodial authority over Petitioner. He is sued in his official capacity.

FACTS

18. Petitioner Angel Jesus Lucas Gregorio is a citizen of Guatemala. He is charged with entering the United States without being admitted or paroled in approximately March 2021. Ex. 1.

19. Prior to his detention, Petitioner resided in Encinitas with his wife and two young children, ages seven and one. His one-year-old daughter is a U.S. Citizen. His seven-year-old daughter is enrolled in the local public school. He has established substantial ties to the community, he regularly attends church, and is well-regarded and well-liked by pillars within his community.

20. On June 22, 2026, more than five years after his entry to the United States, Petitioner was arrested by immigration authorities and placed in removal proceedings.

21. After asking Petitioner for his name, one of the officers instructed him to exit his vehicle. Petitioner asked why he was being ordered out of the vehicle at which point the officer reached his arm through Petitioner's partially opened driver's side window and unlocked and opened the vehicle door. He then grabbed Petitioner's arm and directed him physically and verbally to exit the vehicle. Petitioner was then handcuffed and placed into shackles.

22. The arresting officers did not identify themselves before arresting Petitioner. The officers wore face coverings, and Petitioner was not told why he

was being arrested. The officers did not present Petitioner with an administrative warrant before placing him under arrest. Notwithstanding, Petitioner was cooperative at the time of the arrest. He complied with their instructions, did not attempt to flee, and did not resist the arrest.

23. Respondents did not obtain an administrative warrant before Petitioner's arrest and did not make an individualized determination that Petitioner was likely to escape before a warrant could be obtained.

24. Following his arrest, Petitioner was transported to Otay Mesa Detention Center where he remains detained. Ex. B.

25. Respondents served Petitioner with a Notice to Appear alleging that he entered the United States without being admitted or paroled. 8 U.S.C. § 1182(a)(6)(A)(i). Ex. A. Respondents have not served Petitioner with Form I-213, nor have they provided him with an administrative record reflecting the factual basis for his arrest and detention.

26. Petitioner requested a custody redetermination hearing on Form I-286 on June 22, 2026. To date, he has not received a custody redetermination hearing before an Immigration Judge, nor has one been scheduled.

27. Petitioner's removal proceedings remain pending.

EXHAUSTION OF ADMINISTRATIVE REMEDIES IS NOT REQUIRED AND, ALTERNATIVELY, IS EXCUSED

28. Petitioner is not required to exhaust administrative remedies before seeking relief under 28 U.S.C. § 2241. For habeas claims, exhaustion of administrative remedies is prudential, not jurisdictional. *See Hernandez v. Sessions*, 872 F.3d 976, 988 (9th Cir. 2017). A court may waive prudential exhaustion where administrative remedies are inadequate or not efficacious, pursuit of administrative remedies would be futile, irreparable injury will result, or the administrative proceedings would be void. *Id.; Laing v. Ashcroft*, 370 F.3d 994,

1000 (9th Cir. 2004).

29. Petitioner nevertheless attempted to invoke the administrative process available to him. Following DHS's custody determination, Petitioner timely requested review before an Immigration Judge by executing Form I-286 requesting a custody redetermination hearing. As of the filing of this Petition, no custody redetermination hearing has been held or scheduled.

30. Requiring Petitioner to await completion of the administrative process would serve no practical purpose. Respondents continue to maintain that noncitizens who entered the United States without being admitted or paroled are detained pursuant to 8 U.S.C. § 1225(b)(2)(A) and therefore are categorically ineligible for bond notwithstanding numerous federal district court decisions rejecting that interpretation. The Southern District of California has repeatedly granted habeas relief in the form of immediate release to similarly situated petitioners after concluding that detention is governed by 8 U.S.C. § 1226(a), not §1225(b)(2). *See Miranda Guevara v. Mullin*, Case No.: 3:26-cv-02690-RBM-AHG at 3 (S.D. Cal. May 14, 2026); *Ramirez v. Mullin*, Case No.: 3:26-cv-01880-RBM-VET (S.D. Cal. Apr. 9, 2026); *Perez Solis v. LaRose*, Case No.: 3:26-cv-01532-RBM-AHG (S.D. Cal. Mar. 26, 2026); *Arias Torres v. LaRose*, Case No.: 3:26-cv-01532-RBM-BJW (S.D. Cal. Mar. 26, 2026); *Rodas-Dieguez v. Noem*, Case No.: 3:26-cv-00976-RBM-MMP (S.D. Cal. Feb. 26, 2026).

31. Even if Respondents ultimately provide Petitioner with a custody hearing, that remedy cannot cure the injury alleged in this Petition. As numerous courts have recognized, a post-deprivation bond hearing cannot prevent the erroneous deprivation of liberty that has already occurred. Broadly speaking, "[d]eprivation of physical liberty by detention constitutes irreparable harm." *Arevalo v. Hennessy*, 882 F.3d 763, 767 (9th Cir. 2018). The Ninth Circuit has recognized the "irreparable harms imposed on anyone subject to immigration

detention" including "the economic burdens imposed on detainees and their families as a result of detention." *Hernandez v. Sessions*, 872 F.3d 976, 995 (9th Cir. 2017). A post-deprivation bond hearing cannot serve as an adequate procedural safeguard because it takes place after the fact and therefore cannot prevent an erroneous deprivation of liberty. Even if the Petitioner received a prompt post-detention bond hearing under 8 U.S.C. § 1226(a) and was released at that point, he will have already suffered the harm that is his erroneous detention.

32. Moreover, practitioners and federal courts have increasingly recognized that meaningful relief is not typically possible through the existing administrative channels. Even after federal courts have ordered bond hearings, immigration judges frequently deny release based upon generalized flight-risk determinations, making further administrative proceedings an inadequate means of preventing ongoing unlawful detention. Recent empirical analysis of EOIR's nationwide bond adjudication data further confirms that the existing administrative process has become increasingly ineffective as a mechanism for obtaining release from detention. Researcher Zabdi J. Salazar of UC Berkeley School of Law's recent empirical analysis of nearly 149,000 completed EOIR bond records demonstrates that, while bond hearing volume increased dramatically during 2025 and early 2026, bond outcomes became substantially more denial-heavy nationwide, with denial shares increasing markedly across ten of the eleven circuits. *See* Ex. C. These descriptive findings reinforce Petitioner's contention that further administrative proceedings are unlikely to provide prompt and effective relief from his ongoing detention.

33. Petitioner's warrantless arrest claim independently confirms that exhaustion should be excused in the instant matter. Petitioner's challenge to the legality of his warrantless arrest under 8 U.S.C. § 1357(a)(2) and 8 C.F.R. § 287.8 presents a federal statutory question that an Immigration Judge has no authority to

adjudicate. No available administrative proceeding can determine whether Respondents violated the statutory prerequisites governing warrantless immigration arrests or provide the relief sought for that violation.

34. Because Petitioner has already sought available administrative review, because further proceedings would be futile or inadequate, because each day of continued detention constitutes irreparable harm, and because the claims presented in this Petition cannot be fully remedied through the immigration court process, Petitioner respectfully asks this Court to exercise its habeas jurisdiction without requiring further administrative exhaustion.

CAUSES OF ACTION

COUNT I

Detention Under 8 U.S.C. § 1225(b)(2) is Contrary to the INA

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

36. Respondents have detained Petitioner but have not explicitly stated under which statute he is detained. Instead, they are treating him in a manner consistent with the position that noncitizens who entered the United States without inspection are subject to mandatory detention under 8 U.S.C. § 1225(b)(2) and are therefore categorically ineligible for a custody redetermination hearing before an Immigration Judge.

37. That position is contrary to the text, structure, and purpose of the Immigration and Nationality Act (the INA) and to existing case law of this Court.

38. Congress established separate detention statutes governing different stages of the immigration process. 8 U.S.C. § 1225 governs applicants for admission seeking entry into the United States. 8 U.S.C. § 1226 governs the arrest and detention of noncitizens who are already present in the United States while removal proceedings are pending. 8 U.S.C. § 1231 governs detention following the

entry of a final order of removal. These provisions occupy distinct statutory roles and cannot be treated as interchangeable. *See, e.g. Jennings v. Rodriguez*, 583 U.S. 281 (2018).

39. Petitioner is not an arriving applicant for admission. According to Respondents' own allegations, Petitioner entered the United States in approximately March 2021 and thereafter resided continuously in this country for more than five years before his arrest. Ex. 1. He was apprehended while driving in Encinitas, California, far from any international border or port of entry. He was living with his wife and children and had established substantial community ties before his arrest.

40. Under these circumstances, the mandatory detention provisions of 8 U.SC. § 1225(b)(2) do not apply. Rather, if any statutory authority exists for Petitioner's detention pending removal proceedings, it must be found at 8 U.S.C. § 1226(a) unless they are subject to another detention provision, such as 8 U.S.C. § 1225(b)(1), § 1226(c), or §1231, none of which are applicable to Petitioner. Notably, 8 U.S.C. § 1226(a) authorizes discretionary detention and permits review of custody by an Immigration Judge.

41. Courts throughout the country, and repeatedly within this District, have recognized that § 1225(b)(2) does not authorize mandatory detention of individuals who, like Petitioner, have already entered and resided in the United States before their arrest by immigration authorities. *See Bernardo Aquino v. Larose*, No. 25-cv-02904-RSH-MMP, 2025 WL 3158676, at *3 (S.D. Cal. Nov. 12, 2025) ("The overwhelming majority of courts to address the issue have agreed that Section 1126(a), rather than the mandatory detention provision of Section 1225(b)(2)(A), applies to a noncitizen . . . who has resided in the United States for many years.") (citing cases); *Huerta v. Bondi*, No. 25-cv-00941-JLT-HBK, 2026 WL 366709, at *1 (E.D. Cal. Feb. 10, 2026) (holding that petitioner, who "entered the United

States without inspection and has been residing continuously here for more than 20 years without any contact with immigration authorities . . . is not subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A)"); *J.A.C.P. v. Wofford,* No. 25-cv-01354-KES-SKO, 2025 WL 3013328 (E.D. Cal. Oct. 27, 2025 (same as to petitioner who had resided in the United States for four years before detention); *Lopez Benitez v. Francis,* 795 F. Supp. 3d 475 (S.D.N.Y. 2025); *Silvestre-Mendoza v. Noem*, No. 3:25-cv-03206-RBM-DDL, 2025 WL 3512410 (S.D. Cal. Dec. 8, 2025).

42. More recently, judges of this Court have repeatedly rejected Respondents' continued reliance upon § 1225(b)(2) to detain similarly situated noncitizens residing in the interior of the United States and have ordered their immediate release. *See, e.g. Rodas-Dieguez v. Noem*, No. 3:26-cv-00976-RBM-MMP (S.D. Cal. Feb. 26, 2026); *Perez Solis v. LaRose*, No. 3:26-cv-01532-RBM-AHG (S.D. Cal. Mar. 26, 2026); *Arias Torres v. LaRose*, No. 3:26-cv-01532-RBM-BJW (S.D. Cal. Mar. 26, 2026); *Ramirez v. Mullin*, No. 3:26-cv-01880-RBM-VET (S.D. Cal. Apr. 9, 2026); *Miranda Guevara v. Mullin*, No. 3:26-cv-02690-RBM-AHG (S.D. Cal. May 14, 2026).

43. Respondents nevertheless continue to apply the Board of Immigration Appeals' decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025), to categorically deny Immigration Judges jurisdiction to conduct custody redetermination hearings for noncitizens who entered without inspection. However, an administrative interpretation cannot expand the scope of mandatory detention beyond that authorized by Congress, nor may it override the federal courts' interpretation of the governing statutes.

44. Because Petitioner's detention is not authorized by § 1225(b)(2), Respondents are unlawfully depriving Petitioner of the procedural protections afforded by § 1226(a), including the opportunity to seek release before an

Immigration Judge. Respondents therefore lack statutory authority to continue detaining Petitioner under the mandatory detention provisions of § 1225(b)(2).

45. Immediate release is the appropriate remedy. Where detention is based upon an erroneous assertion of mandatory detention authority under § 1225(b)(2), the injury is not merely the denial of a bond hearing but the unlawful deprivation of liberty itself. As this Court and others across the country have repeatedly recognized, a post-deprivation custody hearing cannot remedy detention that was unauthorized from its inception. Recent decisions within this District have repeatedly ordered immediate release, rather than a post-deprivation bond hearing, where the court concluded that detention rested on an erroneous assertion of mandatory detention authority under 8 U.S.C. § 1225(b)(2). *See Rodas-Dieguez v. Noem*, No. 3:26-cv-00976-RBM-MMP (S.D. Cal. Feb. 26, 2026); *Perez Solis v. LaRose*, No. 3:26-cv-01532-RBM-AHG (S.D. Cal. Mar. 26, 2026); *Arias Torres v. LaRose*, No. 3:26-cv-01532-RBM-BJW (S.D. Cal. Mar. 26, 2026); *Ramirez v. Mullin*, No. 3:26-cv-01880-RBM-VET (S.D. Cal. Apr. 9, 2026); *Miranda Guevara v. Mullin*, No. 3:26-cv-02690-RBM-AHG (S.D. Cal. May 14, 2026).

46. Accordingly, Petitioner respectfully requests that this Court direct Respondents to release Petitioner from immigration custody immediately.

COUNT II

Violation of Due Process Clause of the Fifth Amendment

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

48. The Fifth Amendment provides that no person shall be deprived of liberty without due process of law. Noncitizens physically present within the United States, regardless of their immigration status, are protected by the Due Process Clause with respect to deprivations of physical liberty. "Freedom from imprisonment—from government custody, detention, or other forms of physical

restraint—lies at the heart of the liberty…". *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001). Immigration detention constitutes a significant deprivation of liberty and must therefore comport with constitutional requirements. *See Hernandez v. Sessions*, 872 F.3d 976, 990-91 (9th Cir. 2017) (recognizing that due process requires adequate procedural protections in immigration detention).

49. Petitioner has remained continuously present in the United States for more than five years. He was arrested on June 22, 2026, transported to Otay Mesa Detention Center, and has remained incarcerated without any meaningful opportunity to challenge the legal basis for his detention.

50. Although Petitioner requested custody review, Respondents have failed to provide him with a meaningful opportunity to obtain an individualized determination regarding the legality of his continued detention.

51. Respondents instead have been treating Petitioner as though he is categorically ineligible for a custody redetermination hearing because he allegedly entered the United States without being admitted or paroled, notwithstanding the substantial body of federal authority concluding that similarly situated individuals are detained under 8 U.S.C. § 1226(a).

52. By refusing to provide Petitioner with any meaningful mechanism to challenge the legal basis for his continued detention, Respondents have deprived Petitioner of liberty without constitutionally adequate process. *See Singh v. Holder*, 638 F.3d 1196, 1203-04 (9th Cir. 2011) (finding that Due Process requires a meaningful opportunity to be heard before a neutral decisionmaker regarding the necessity of continued detention.)

53. The procedural safeguards required by the Fifth Amendment must be evaluated in light of the balancing test articulated in *Mathews v. Eldridge*, 424 U.S. 319 (1976).

54. First, Petitioner's private interest is extraordinarily significant. He has been deprived of his physical liberty and separated from his wife and children while his removal proceedings remain pending. Every additional day of detention constitutes an ongoing deprivation of a fundamental liberty interest.

55. Second, the risk of erroneous deprivation is substantial. Petitioner's detention rests upon Respondents' interpretation that all noncitizens who entered without inspection are categorically subject to mandatory detention under 8 U.S.C. § 1225(b)(2). Numerous federal courts—including multiple judges of this District—have rejected that interpretation and held that similarly situated individuals are detained under § 1226(a) and therefore entitled to custody review. The existence of this substantial body of contrary authority demonstrates a significant risk that Petitioner is being detained under an erroneous legal standard.

56. That risk is compounded because Respondents have not afforded Petitioner any meaningful opportunity to challenge the legal basis for his detention before a neutral decisionmaker. Instead, Respondents' legal position effectively forecloses consideration of whether Petitioner's detention is governed by § 1226(a).

57. Third, the Government has no legitimate interest in denying constitutionally adequate procedures. If Respondents believe Petitioner presents a danger to the community or a risk of flight, Congress has already provided a mechanism for making that determination through the custody review procedures established in 8 U.S.C. § 1226(a). Respondents have instead relied upon an erroneous interpretation of the detention statutes to deny those procedures altogether.

58. Under these circumstances, the procedures afforded to Petitioner are constitutionally inadequate.

59. A delayed custody hearing would not remedy the constitutional

violation. The injury alleged in this Petition is the ongoing deprivation of liberty resulting from Respondents' unlawful detention of Petitioner. A post-deprivation hearing cannot restore the liberty already lost while Petitioner remained incarcerated without lawful authority. *See E.A. T.-B. v. Wamsley*, 795 F. Supp. 3d 1316, 1324 (W.D. Wash. 2025) ("Although the Government notes that Petitioner may request a bond hearing while detained, such a post-deprivation hearing cannot serve as an adequate procedural safeguard because it is after the fact and cannot prevent an erroneous deprivation of liberty."); *Jorge M.F. v. Jennings*, 534 F. Supp. 3d 1050, 1055 (N.D. Cal. 2021) ("if Petitioner is detained, he will already have suffered the injury he is now seeking to avoid"); *Domingo v. Kaiser*, Case No. 25-cv-05893 (RFL), 2025 WL 1940179, at *3 (N.D. Cal. July 14, 2025) ("Even if Petitioner [] received a prompt post-detention bond hearing under 8 U.S.C. § 1226(a) and was released at that point, he will have already suffered the harm that is the subject of his motion; that is, his potentially erroneous detention.").

60. Recent decisions within this District recognize that where detention is predicated upon an erroneous assertion of mandatory detention authority, immediate release constitutes the appropriate remedy because continued detention itself violates the Constitution and a delayed custody hearing cannot fully cure the deprivation already suffered. *See Rodas-Dieguez v. Noem*, No. 3:26-cv-00976-RBM-MMP (S.D. Cal. Feb. 26, 2026); *Perez Solis v. LaRose*, No. 3:26-cv-01532-RBM-AHG (S.D. Cal. Mar. 26, 2026); *Arias Torres v. LaRose*, No. 3:26-cv-01532-RBM-BJW (S.D. Cal. Mar. 26, 2026); *Ramirez v. Mullin*, No. 3:26-cv-01880-RBM-VET (S.D. Cal. Apr. 9, 2026); *Miranda Guevara v. Mullin*, No. 3:26-cv-02690-RBM-AHG (S.D. Cal. May 14, 2026).

61. Moreover, requiring Petitioner to continue pursuing administrative remedies would not provide constitutionally adequate process. Petitioner has already requested custody review. Respondents continue to maintain the legal

position that similarly situated individuals are categorically ineligible for such review. Under these circumstances, further delay serves only to prolong the unconstitutional deprivation of Petitioner's liberty.

62. Because Respondents have deprived Petitioner of his liberty without constitutionally sufficient procedures, Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment.

63. Petitioner respectfully requests that this court issue a writ of habeas corpus ordering his immediate release from immigration custody.

COUNT III

Violation of 8 U.S.C. § 1357(a)(2) and 8 C.F.R. § 287.8(c)(2)(ii): Warrantless Arrest Without Probable Cause of Flight Risk

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

65. Respondents arrested Petitioner without a warrant and without an individualized finding of flight risk. The failure to meet these requirements is a violation of 8 U.S.C. § 1357(a)(2).

66. The failure to conduct an individualized assessment of whether Petitioner was "likely to escape before a warrant can be obtained" is a violation of 8 C.F.R. § 287.8(c)(2)(ii). The reason to believe standard meets the probable cause standard of the Fourth Amendment. *Perez Cruz v. Barr*, 926 F.3d 1128, 1137 (9th Cir. 2019).

67. Arrest in violation of the regulation is unlawful. *See Sanchez v. Sessions,* 904 F.3d 643, 650 (9th Cir. 2018; *Perez Cruz v. Barr*, 926 F.3d 1128, 1137 (9th Cir. 2019).

68. Because Congress conditioned warrantless arrests upon an individualized determination that the noncitizen is likely to escape before a warrant can be obtained, Respondents lacked statutory authority to arrest and detain

Petitioner absent compliance with § 1357(a)(2).

69. Therefore, there is no statutory or regulatory authority to hold Petitioner in immigration detention in light of these violations and immediate release from immigration detention is required by law. *Urias v. Semaia*, No. 5:26-CV-02753-DTB, 2026 WL 1710375, at *6 (C.D. Cal. June 10, 2026); *Galvez Pantoja v. DHS*, No. 5:26-CV-02084-JDE, 2026 WL 1601897, at *4 (C.D. Cal. June 1, 2026); *Ahmed M. v. Bondi*, No. 25 CV-4711 (ECT/SGE), 2026 WL 25627, at*3 (D.Minn.Jan.5, 2026); *Lopez-Sanchez v. Blanche*, No. 8:26CV264, 2026 WL 1759557, at *3 (D. Neb. June 18, 2026); *Chiliquinga Yumbillo v. Stamper*, No. 2:25-cv-00479-SDN, 2025 WL 2783642, at *5 (D. Me. Sept. 30, 2025); *J.A.C.P. v. Wofford*, No. 1:25-cv-01354-KES-SKO (HC), 2025 WL 3013328, at *8 (E.D. Cal. Oct. 27, 2025).

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

a. Assume jurisdiction over this matter;

b. Order that Respondents release Petitioner immediately without the imposition of any restraints on his liberty, such as reporting requirements, GPS, or electronic monitoring and that Respondents return any confiscated property and documents to Petitioner upon his release;

c. Order Respondents not to re-detain Petitioner without first providing at least seven days' notice and a pre-deprivation bond hearing before an Immigration Judge at which the Government bears the burden of proof to show by clear and convincing evidence that Petitioner is a flight risk or a danger to the community and that no condition or combination of conditions could reasonably assure Petitioner's future appearance and/or the safety of the community, and the Immigration Judge must conduct an individualized assessment of Petitioner's suitability for bond in light of the forgoing

standard;

d. Award reasonable attorneys fees and costs pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412(d), 5 U.S.C. § 504, or any other applicable law; and

e. Order further relief as this Court deems just and appropriate.

Dated July 8, 2026

Respectfully Submitted,

S/Lauren Ross
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P.O. Box 12666
San Diego, CA 92112
Tel: (619) 231-7788

Counsel for Petitioner

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I am submitting this verification on behalf of Petitioner because I am Petitioner's attorney. I have discussed with Petitioner the events described in the Petition and have reviewed relevant records and documents. Based on those discussions and the documents reviewed, I hereby verify that the factual statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Executed on this 8th day of July, 2026, in Solana Beach, California.

/S/ Lauren K. Ross

Counsel for Petitioner

EXHIBIT INDEX

Exhibit A - Form I-862, Notice to Appear

Exhibit B - ICE Detainee Locator Search Results Retrieved July 8, 2026

Exhibit C - Declaration of Zabdi J. Salazar on National Immigration Court Bond Outcomes and Recorded Bond Amounts

EXHIBIT A

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

DOB: [redacted]
Event No: [redacted]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [redacted]
File No: [redacted]

In the Matter of:

Respondent: ANGEL JESUS LUCAS GREGORIO currently residing at:

7488 Calzada de la Fuente San Diego, CALIFORNIA 92154 (619) 671-8700
(Number, street, city, state and ZIP code) (Area code and phone number)

☐ You are an arriving alien.

☒ You are an alien present in the United States who has not been admitted or paroled.

☐ You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;

2. You are a native of GUATEMALA and a citizen of GUATEMALA;

3. You entered the United States at or near Nogales, Arizona, on or about March 15, 2021;

4. You were not then admitted or paroled after inspection by an Immigration Officer.ORAt that time you arrived at a time or place other than as designated by the Attorney General.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

☐ This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.

☐ Section 235(b)(1) order was vacated pursuant to: ☐ 8CFR 208.30 ☐ 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

7488 CALZADA DE LA FUENTE, SAN DIEGO, CALIFORNIA 92154. OTAY MESA DETENTION CENTER
(Complete Address of Immigration Court, including Room Number, if any)

on July 6, 2026 (Date) at 8:00 am (Time) to show why you should not be removed from the United States based on the charge(s) set forth above.

VUONG PHAN - (A) SDDO
(Signature and Title of Issuing Officer)

Date: June 22, 2026

San Diego, CA
(City and State)

EOIR – 1 of 3

Exh. 1 – Adm.

Notice to Respondent

Alien Registration: This Notice to Appear serves as evidence of your alien registration pursuant to INA § 262. If you are 18 years or older, failure to carry this Notice to Appear, or other evidence of alien registration as provided in 8 C.F.R. § 264.1(b), on your person at all times is a criminal offense pursuant to INA § 264(e), for which you may be subject to a criminal penalty of $5,000 and imprisonment of up to 30 days.

Notification to the Department of Homeland Security (DHS) of Change of Address: All aliens aged 14 years or older, and all parents and legal guardians of aliens under the age of 14, must report a change of address to U.S. Citizenship and Immigration Services, a component of DHS, within 10 days of moving, pursuant to INA § 265(a). Failure to notify DHS of your change of address is a criminal offense pursuant to INA § 266(b), for which you may be subject to a criminal penalty of $5,000 and imprisonment of up to 30 days. More information is available online at **https://www.uscis.gov/addresschange. This obligation is in addition to your obligation to notify the Immigration Court of your change of address.**

Representation: If you choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to INA §§ 240(b)(4)(A) and 292. Unless you request otherwise in writing, no hearing will be scheduled earlier than 10 days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost is provided with this notice.

Conduct of the hearing: At your hearing you will be given the opportunity to admit or deny any or all of the allegations in this Notice to Appear, including that you are inadmissible or deportable. You will be advised by the immigration judge of any relief from removal for which you may appear eligible, including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge. At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross-examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at **www.uscis.gov/i-589**. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to INA § 208(a)(2)(B).

Notification to the Immigration Court of Change of Address: You are required to notify the Immigration Court, in writing, of your full mailing address and telephone number (if any). You must also immediately notify the Immigration Court whenever you change your address or telephone number during the course of this proceeding by using Form EOIR-33/IC, Change of Address/Contact Information Form. Notices of hearing will be mailed to this address. If you file a Form EOIR-33/IC with the Immigration Court, you must serve a copy on the ICE Office of the Principal Legal Advisor. If you change your address or telephone number during the course of this proceeding and do not submit Form EOIR-33/IC, the Immigration Court shall not be required to provide you with written notice of your hearing. **This obligation is in addition to your obligation to notify DHS of your change of address.**

Failure to Appear: If you fail to attend the hearing at the date, time, and place designated on this notice, or any date, time, or place later directed by the Immigration Court, the immigration judge shall order you removed in your absence upon determining that you were provided written notice and are removable. If you are arrested by ICE after being ordered removed in your absence by the immigration judge pursuant to INA § 240(b)(5), you will be required to pay a minimum fee of $5,000, adjusted for inflation, or a greater amount as established by the Secretary of Homeland Security.

Mandatory Duty to Depart the United States: If you become subject to a final order of removal as defined in 8 C.F.R. § 1241.1, you must depart the United States within 90 days of the order. If you do not depart, you may be subject to a civil penalty under INA § 274D(a) of $500 per day, adjusted for inflation, and imprisonment of up to 4 years (or 10 years if you belong to certain specified classes described in INA § 237(a)(1)(E), (2), (3), or (4)). If you are granted voluntary departure, you must comply with the terms of the voluntary departure order. If you fail to voluntarily depart within the time provided, you will be subject to a final order of removal, may be ineligible for certain immigration benefits for a period of 10 years from the date you overstayed the order, and may be subject to a civil penalty from $1,000 to $5,000, adjusted for inflation. For additional information, refer to the order granting voluntary departure, as well as INA § 240B(d).

Sensitive Locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in INA § 239(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

(Signature of Respondent)

(Signature and Title of Immigration Officer)

Date: _____

Certificate of Service

This Notice To Appear was served on the respondent by me on June 22, 2026, in the following manner and in compliance with section 239(a)(1) of the Act.

☒ in person ☐ by certified mail, returned receipt # _____ requested ☐ by regular mail

☐ Attached is a credible fear worksheet.

☒ Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the SPANISH language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

[redacted] C 15516 VARGAS IBANEZ - Deportation Officer

(Time if Personally Served) *(Signature and Title of officer)*

Privacy Act Statement

Authority:
The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:
You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:
For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at https://www.dhs.gov/system-records-notices-sorns. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at https://www.justice.gov/opcl/doj-systems-records. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:
Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

EOIR – 3 of 3

Exh. 1 - Adm.

EXHIBIT B

Search Results: 1

ANGEL JESUS LUCAS GREGORIO

Country of Birth : Guatemala
A-Number [redacted]
Status : In ICE Custody
State: CA
Current Detention Facility: OTAY MESA DETENTION CENTER
** Click on the Detention Facility name to obtain facility contact information*

BACK TO SEARCH >

Related Information

Helpful Info

Status of a Case

About the Detainee Locator

Brochure

ICE ERO Field Offices

ICE Detention Facilities

Privacy Notice

External Links

Bureau of Prisons Inmate Locator

EXHIBIT C

DECLARATION OF ZABDI J. SALAZAR ON NATIONAL IMMIGRATION COURT BOND OUTCOMES AND RECORDED BOND AMOUNTS

I, Zabdi J. Salazar, do depose and state:

INTRODUCTION

1. I am a Ph.D. candidate in Jurisprudence and Social Policy at Berkeley Law, where I conduct empirical analysis of immigration adjudication using EOIR administrative case data.
2. For this declaration, I analyzed EOIR bond records nationally from January 1, 2024 through April 30, 2026. The analysis focuses on national bond outcomes, recorded bond amounts, November 2025 bond-amount patterns, and court-level patterns around the period of an alleged November 2025 directive concerning immigration-judge bond adjudications.
3. The data show a sharp increase in national bond adjudication volume from 2024 to 2025 and increasingly denial-heavy outcomes in later 2025 and early 2026. Completed bond records increased from 34,845 in 2024 to 80,130 in 2025. Over the same annual comparison, the grant rate among grant/denial outcomes fell from 42.2% to 36.7%, while denials as a share of all completed records rose from 36.1% to 43.2%. In quarterly comparisons, the sharpest adverse outcome shift occurred from 2025 Q2 to 2025 Q3, when the grant rate fell by 16.8 percentage points and denial share rose by 11.5 percentage points; denial share continued rising in 2025 Q4 and 2026 Q1.
4. National bond-amount patterns were more heterogeneous than the outcome trends. The national median bond amount was stable at $6,000 in the annual comparison between 2024 and 2025, but upper-tail amounts increased: the 90th percentile rose from $12,000 to $15,000, and the 95th percentile rose from $15,000 to $18,000. In quarterly comparisons, 2026 Q1 showed the clearest increase in typical bond amounts, with the median rising to $7,500 and the mean rising to $9,211; court-level Q4-to-Q1 comparisons show that this increase reflected a geographically broad pattern. A November weekly screen and five-month persistence checks identified courts with persistent post-November median bond increases, including ADL, ELO, SDC, and JNA. Circuit-level comparisons further show that post-November patterns varied across and within circuits, with local factors such as case mix and bond-eligibility developments affecting some court-specific patterns. Exhibit B summarizes the national sample, calendar trends, bond-amount statistics, weekly screen, persistence checks, circuit-level court comparisons, and supplemental Imperial/Ninth Circuit context.

METHODOLOGY

5. I analyzed the raw associated-bond table, D_TblAssociatedBond, from EOIR's publicly available case data files in the FOIA Library. I refer to these observations as "bond records" or "completed bond records," rather than as unique cases, because the raw table is organized at the bond-record level.
6. Several analysis windows are used and specified in the accompanying exhibits. I used comp_date as the completion-date field. Exhibit C, Courts Included in the National Declaration Sample, reports the national declaration sample, which includes court/code families with at least 500 completed bond records and at least 50 positive new_bond records in the January 1, 2024 through April 30, 2026 window, after same-location code groupings. The sample includes 34 court/code families representing 37 underlying EOIR base city court codes.
7. I classified C, G, I, and R as grants; D, E, J, N, and S as denials; W as withdrawals; and all remaining decision codes as Other. Excluding R from the grant category did not materially change the results. Shares of all completed records use all completed bond records as the denominator. Grant rates use only records classified as grants or denials. This restricted grant/denial denominator describes the adjudicated grant-versus-denial outcome mix and yields higher absolute rate levels than an all-record denominator. Exhibit B also reports grants, denials, withdrawals, and Other outcomes as shares of all completed records where relevant. Exh. B, Table 1.
8. For bond-amount statistics, I used the new_bond field and limited calculations to grant-coded records with a positive recorded bond amount. Positive bond amounts do not perfectly overlap with grant-coded records because EOIR does not always populate the bond-amount field for every grant, and occasional non-grant records may contain a positive amount. Exhibit B labels these statistics as grant-coded positive bond amounts unless otherwise stated.
9. I conducted several descriptive comparisons. Calendar-window comparisons report annual and quarterly trends. The November weekly screen compares short windows in November, and the persistence checks compare five-month pre-periods with the period from each candidate split date through April 30, 2026. Because courts may have different timing patterns, these November dates are descriptive cutoffs tied to the alleged directive period, not a single national inflection date. I therefore used a two-tier approach. Table 5 uses court-specific candidate split dates to assess whether apparent changes persisted at individual courts. The circuit tables use November 10 as a common equal-length benchmark tied to the alleged directive period, so that courts and circuits are compared over the same pre/post calendar windows: May 22 through November 9, 2025 pre-period, and November 10, 2025 through April 30, 2026 post-period. Exh. B,

Tables 2, 5–18. Exhibit B also includes supplemental nationality/case-mix checks and monthly grant-rate diagnostics for Imperial and other Ninth Circuit courts. Exh. B, Tables 19–20 & Figs. 4–5.

10. I report statistical checks for selected comparisons. For rate and share changes, I used two-proportion tests. For mean bond amounts in selected tables, I used Welch t-tests, including log-scale Welch t-tests where indicated. These tests are descriptive checks of the observed administrative data and do not by themselves establish the cause of the observed changes.

FINDINGS: NATIONAL SAMPLE, CALENDAR TRENDS, AND BOND AMOUNTS

11. From January 1, 2024 through April 30, 2026, I identified 148,761 completed bond records in the national declaration sample. The sample includes 34 court/code families representing 37 underlying EOIR base city court codes. There were 37,836 grant records, 65,683 denial records, 34,246 withdrawal records, and 10,996 Other records. Denials therefore made up the largest share of completed records, at 44.2%. The sample included 36,058 records with positive recorded bond amounts, of which 35,881 were grant-coded positive bond records. Among those grant-coded positive bond records, the median bond amount was $6,000 and the mean bond amount was $8,178. Exh. B, Table 1.

12. Bond adjudication volume increased sharply from 2024 to 2025. Completed bond records more than doubled, rising from 34,845 in 2024 to 80,130 in 2025, while grant/denial records increased from 21,784 to 54,691, about 2.5 times the 2024 level. Exh. B, Table 2.

13. The outcome mix also became more denial-heavy. From 2024 to 2025, denials rose by 7.1 percentage points as a share of all completed records, from 36.1% to 43.2%, while the grant rate among grant/denial outcomes fell by 5.5 percentage points, from 42.2% to 36.7%. The sharpest quarterly shift occurred from 2025 Q2 to 2025 Q3, when the grant rate fell by 16.8 percentage points and denial share rose by 11.5 percentage points. Denial share then continued rising, reaching 50.8% in 2025 Q4 and 54.9% in 2026 Q1. Exh. B, Table 2.

14. The monthly outcome trend is consistent with the table-level pattern, but it also shows important timing variation. Grant-, denial-, and withdrawal-coded decisions all increased with overall volume in 2025. Figure 1 marks selected policy-context dates, including the July 8 DHS/Lyons Memo and the September 5 BIA decision in *Yajure Hurtado*, which addressed mandatory detention and immigration-judge bond eligibility. I use these markers as descriptive context for the changing detention and bond-eligibility environment. Monthly denial-coded decisions rose sharply by mid-2025, dipped in the fall, and then increased again in the post-November period, with that later increase driven most strongly by

denials. Withdrawals rose during the first-half 2025 volume expansion, then declined as a share of completed records as denials accelerated; that withdrawal trend may reflect multiple factors, including policy, processing, or case-composition changes. Exh. B, Table 2 & Figure 1.

15. National recorded bond amounts did not show a uniform annual median increase from 2024 to 2025. Among grant-coded records with positive bond amounts, the national median was $6,000 in both 2024 and 2025. At the same time, upper-tail amounts increased: the 90th percentile rose from $12,000 to $15,000, and the 95th percentile rose from $15,000 to $18,000. Exh. B, Table 3.

16. The clearest national increase in typical bond amounts appears in 2026 Q1. The median rose from $5,000 in 2025 Q4 to $7,500 in 2026 Q1, and the mean rose from $7,801 to $9,211. The monthly median also rose in early 2026, reaching $7,500 in February 2026 and remaining at $7,500 through April 2026. Exh. B, Table 3 & Figure 2. To assess whether this national increase was driven by a small number of courts or a broader pattern, I compared court-level bond amounts from 2025 Q4 to 2026 Q1. That comparison shows a geographically broad pattern: 20 of 34 courts had higher Q1 medians, and 27 of 34 had higher Q1 means. Exh. B, Table 4.

FINDINGS: NOVEMBER WEEKLY SCREEN AND FIVE-MONTH PERSISTENCE CHECKS

17. I next examined whether selected courts showed short-window bond-amount jumps around the candidate November period. This analysis is narrower than the broader circuit-level comparisons discussed below. It identifies courts with short window increases around November and then assesses whether those increases persisted. Other courts also had higher post-period median bond amounts under the equal-length November 10 split, but those increases were not always cleanly timed to the November window and are reported separately in the circuit-level tables.

18. The short-window screen identified ADL as a November 10 window jump, ELO as a November 17 window jump, and KRO, DET, SDC, JNA, and CIC as November 20 window jumps. For example, ADL increased from a median of $6,000 in the November 3–9 window to $10,000 in the November 10–19 window, while KRO increased from $4,000 in the November 10–19 window to $7,500 in the November 20–30 window. Exh. B, Table 5.

19. I treat the short window screen as a descriptive screening tool. The windows are short, and several rows involve small bond-record counts. For that reason, I used a five-month pre/post persistence check to evaluate whether the short window increases persisted over a longer period. Exh. B, Tables 5–6.

20. The five-month persistence check identified persistent median increases at ADL, ELO, SDC, and JNA. ADL increased from a median of $7,500 before November 10 to $10,000 after November 10. ELO increased from $5,500 before a November 17 candidate split to $9,000 after that split. SDC increased from $6,000 before November 20 to $8,000 after November 20. JNA increased from $7,500 before November 20 to $10,000 after November 20. The mean bond amount also increased at each of these four court codes, with log-scale Welch t-tests indicating $p < 0.05$ for the mean-bond changes shown in Exhibit B. Exh. B, Table 6.

21. KRO showed a different pattern. Its median remained $5,000 in the five-month pre/post check, but its mean increased from $9,301 to $12,102, and its P75 increased from $7,000 to $10,000. CIC likewise had no median increase, but its mean and P75 increased. I therefore treat KRO and CIC as distributional-shift examples rather than persistent median-increase courts. DET did not show a clear persistent increase; its mean decline should be read cautiously given the increase in bond records from 76 in the pre-period to 553 in the post-period and possible case-composition changes. Exh. B, Table 6.

22. The monthly median plot for the selected November candidate courts is consistent with the persistence table. ADL, ELO, SDC, and JNA each show higher monthly median bond amounts after their November candidate split dates. This figure is descriptive and should be read with the five-month pre/post checks in Table 6. Exh. B, Figure 3.

FINDINGS: CIRCUIT-LEVEL AND COURT-LEVEL HETEROGENEITY

23. The equal-length November 10 circuit summary shows heterogeneity in bond amounts across circuits, which likely reflects differences in case composition, policy changes, and other factors. Nonetheless, circuit-level median bond amounts increased in five circuits—the Second, Third, Ninth, Tenth, and Eleventh—but were flat or lower in the remaining circuits. Mean bond amounts increased in 8 of 11 circuits, indicating broader upward movement in average bond amounts even where circuit medians did not rise. Outcome patterns were more consistent: denial shares increased in 10 of the 11 circuits, and withdrawal shares fell in all 11 circuits. Exh. B, Table 7.

24. The detailed court-level circuit tables show that the post-period bond amount increases were concentrated in particular courts rather than uniform within every circuit. Several courts had higher post-period median bond amounts, including Batavia, Elizabeth, Kansas City, Adelanto, Eloy, Florence, Jena, Oakdale, Aurora, and Lumpkin/Stewart. Other courts had flat or lower medians, though some still showed higher mean bond amounts. Exh. B, Tables 8–18.

25. Among immigration courts within the Ninth Circuit, Adelanto, Eloy, and Florence showed higher post-period median bond amounts, lower grant rates, and higher denial shares. Adelanto's median bond increased from $7,500 to $10,000; Eloy's from $5,000 to $9,000; and Florence's from $6,000 to $7,500. Denial shares increased at six of the seven courts shown. Imperial moved differently: its median bond amount was unchanged at $2,500, while its grant rate increased from 30.3% to 48.5% (+18.2 percentage points). A supplemental case-mix check showed substantial Imperial-specific composition changes, including lower post-period shares of Mexican and Guatemalan nationals and higher shares of Indian, Chinese, and Salvadoran nationals. Because bond amounts are measured only among grant-coded positive-bond records, changes in the mix of respondents receiving bond hearings and grants can affect the bond-amount sample itself. These composition changes, together with contemporaneous bond-eligibility developments from the *Maldonado Bautista* litigation, suggest that Imperial reflected additional case-mix and bond-eligibility factors not present in the same way at Adelanto, Eloy, and Florence. Exh. B, Tables 16, 19–20 & Figs. 4–5.

26. In the Fifth Circuit, Jena and Oakdale showed the strongest combined bond-amount and outcome shifts: median and mean bond amounts increased, grant rates fell, and denial shares rose. Jena increased from a median bond of $7,500 to $9,500, and Oakdale increased from $8,000 to $10,000. Other courts had mostly flat or lower medians, but mean bond amounts increased at Los Fresnos, Conroe, Houston, and El Paso, and denial shares increased at five of the six other courts shown. Exh. B, Table 12.

27. The Eleventh Circuit comparison distinguishes Lumpkin/Stewart from Krome and Orlando. Lumpkin/Stewart had both higher post-period mean and median bond amounts, with the median increasing from $7,000 to $8,000. Krome and Orlando had higher post-period mean bond amounts, but their medians remained unchanged at $5,000. Grant rates fell and denial shares increased at all three courts. Exh. B, Table 18.

28. The additional circuit comparisons confirm that the post-period bond-amount shifts were not confined to the Fifth, Ninth, and Eleventh Circuits, but they also were not uniform. Elizabeth in the Third Circuit had one of the largest post-period median increases, from $6,500 to $10,000, alongside a lower grant rate and higher denial share. Aurora in the Tenth Circuit had a higher post-period median and a substantially higher denial share, while Otero's median was unchanged. Batavia in the Second Circuit also had higher post-period median and mean bond amounts, though its grant rate increased as well. Exh. B, Tables 9, 10, and 17.

29. The circuit and court-level comparisons show a meaningful post-period median bond-amount increase pattern concentrated in 13 of the 34 courts shown, rather than a uniform increase across every court. Mean bond amounts increased more

broadly, rising in 23 of 34 courts. Denial-share increases were broader still, appearing across 10 of 11 circuits and in 27 of 34 courts. Exh. B, Tables 7–18.

CONCLUSION

30. The national data show a marked increase in bond adjudication volume and a broad shift toward more denial-heavy outcomes. Completed bond records more than doubled from 34,845 in 2024 to 80,130 in 2025, while grant/denial records increased to about 2.5 times the 2024 level. Over the same annual comparison, the grant rate fell from 42.2% to 36.7%, and denial share rose from 36.1% to 43.2%. The denial-share increase became more pronounced in later periods, reaching 50.8% in 2025 Q4 and 54.9% in 2026 Q1.

31. The bond-amount evidence is more heterogeneous than the outcome evidence, but it shows meaningful upward movement in upper-tail national amounts and in 2026 Q1. The annual national median remained $6,000 in both 2024 and 2025, but the 90th percentile rose from $12,000 to $15,000, and the 95th percentile rose from $15,000 to $18,000. In 2026 Q1, typical bond amounts also increased, with the median rising to $7,500 and the mean rising to $9,211. Court-level Q4-to-Q1 comparisons indicate that the Q1 increase reflected a geographically broad but heterogeneous pattern, with higher Q1 medians at 20 of 34 courts and higher Q1 means at 27 of 34 courts.

32. The November short-window and five-month persistence checks identify the courts most directly connected to the alleged November directive period. ADL, ELO, SDC, and JNA each showed persistent median increases after their candidate November split dates. KRO and CIC did not show median increases, but both showed upward movement in mean and P75 bond amounts. DET did not show a clear persistent increase, and its mean decline should be read cautiously given the large increase in positive-bond records. These checks show that the strongest November-period bond-amount evidence is court-specific rather than uniform.

33. The circuit comparisons provide broader context. Under the equal-length November 10 split, median bond amounts increased in 13 of the 34 courts shown, including prominent increases at Batavia, Elizabeth, Kansas City, Adelanto, Eloy, Florence, Jena, Oakdale, Aurora, and Lumpkin/Stewart. Mean bond amounts increased in 23 of 34 courts. These broader post-period increases show that the bond-amount pattern was not limited to the core November candidate courts.

34. Overall, the results support three conclusions. First, national bond adjudication volume increased sharply from 2024 to 2025. Second, national outcomes became substantially more denial-heavy in later 2025 and early 2026, with denial-share increases appearing in 10 of 11 circuits and 27 of 34 courts. Third, bond-amount

changes were more uneven but still meaningful: the national upper tail increased, the Q1 2026 national median rose, and several courts showed distinct post-period upward shifts, with the strongest November-period median increase evidence at ADL, ELO, SDC, and JNA. Imperial's divergent pattern illustrates that local case mix and bond-eligibility developments, including *Maldonado Bautista*, may affect particular court patterns. Other local conditions, including IJ assignments, staffing changes, and detention patterns, may also contribute to variation. I therefore treat the denial trend as the most consistent national finding and the evidence on bond amounts as substantial but more court-specific.

INDEX OF EXHIBITS

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I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 8, 2026, at Austin, TX.

Zabdi J. Salazar

Zabdi J. Salazar

Exhibit B. National Bond Adjudication Outcomes and Recorded Bond Amounts

These tables and figures summarize national immigration-court bond outcomes and recorded bond amounts. Section I presents the national sample overview, calendar-window outcomes, bond-amount statistics, and the monthly grant/denial trend. Section II reports directive-period bond-amount checks and persistence checks for court/code families with November weekly bond-amount jumps. Section III provides court-level comparisons by circuit using an equal-length November 10, 2025 split. Section IV provides supplemental context for Imperial and other courts under the Ninth Circuit using nationality-composition changes, monthly Imperial outcome counts, and monthly grant-rate figures with selected timing markers.

Note: Unless stated otherwise, the analysis window is Jan. 1, 2024–Apr. 30, 2026; records with completion dates on or after a stated cutoff are treated as post-cutoff. Grant/denial rates exclude withdrawals and Other outcomes. Outcome shares use all completed bond records as the denominator. Bond-amount statistics use grant-coded records with a positive recorded new_bond amount, unless otherwise indicated. Percentages are rounded; pp changes use unrounded values.

I. National Sample, Calendar Trends, and Bond Amounts

Table 1. National Declaration Sample Overview

Metric	Value
Analysis window	2024-01-01 to 2026-04-30
Total completed bond records	148,761
Underlying base city codes	37
Grant/denial records	103,519
Grant rate among grant/denial records	36.5%
All positive recorded bond records	36,058
Grant-coded positive bond records	35,881
Grant-coded positive bond share	24.1%
Median grant-coded positive bond amount	$6,000
Mean grant-coded positive bond amount	$8,178

Outcome Composition of All Completed Records

Outcome category	Records	Share of all completed records
Grants	37,836	25.4%
Denials	65,683	44.2%
Withdrawals	34,246	23.0%
Other outcomes	10,996	7.4%

Key point: The national sample contains 148,761 completed bond records across 37 underlying base city codes from January 2024 through April 2026. Denials made up the largest share of completed records, at 44.2%, followed by grants at 25.4%, withdrawals at 23.0%, and Other outcomes at 7.4%. Among grant/denial outcomes, the overall grant rate was 36.5%.

Note: Outcome shares use all completed bond records as the denominator. The grant rate uses only grant/denial records and excludes withdrawals and Other outcomes. All positive recorded bond records are reported for transparency; bond-amount statistics use grant-coded records with positive recorded bond amounts.

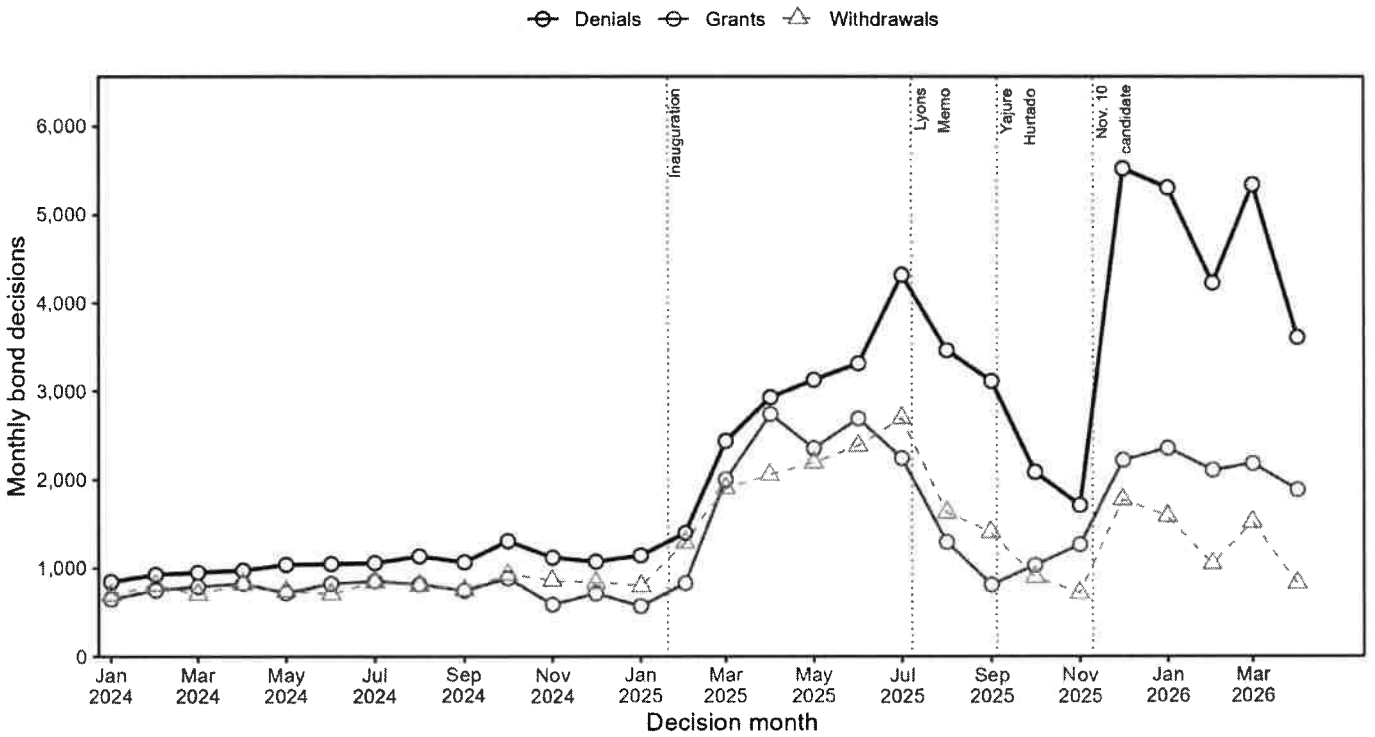
Table 2. National Bond Outcomes by Calendar Window

Window	Total Records	Grant Rate	Denial Share	Withdrawal Share
Annual Comparisons				
2024	34,845	42.2% 9,200/21,784	36.1% 12,584/34,845	27.4% 9,532/34,845
2025	80,130	36.7% (-5.5 pp) 20,091/54,691	43.2% (+7.1 pp) 34,600/80,130	24.6% (-2.7 pp) 19,746/80,130
Quarterly Comparisons				
2025 Q1	13,592	40.6% 3,413/8,403	36.7% 4,990/13,592	29.4% 3,995/13,592
2025 Q2	25,547	45.4% (+4.8 pp) 7,791/17,172	36.7% (+0.0 pp) 9,381/25,547	26.0% (-3.4 pp) 6,640/25,547
2025 Q3	22,631	28.6% (-16.8 pp) 4,358/15,263	48.2% (+11.5 pp) 10,905/22,631	25.3% (-0.7 pp) 5,729/22,631
2025 Q4	18,360	32.7% (+4.1 pp) 4,529/13,853	50.8% (+2.6 pp) 9,324/18,360	18.4% (-6.9 pp) 3,382/18,360
2026 Q1	**27,134**	**30.9% (-1.8 pp)** **6,657/21,541**	**54.9% (+4.1 pp)** **14,884/27,134**	**15.3% (-3.2 pp)** **4,143/27,134**

Key point: Bond adjudication volume increased sharply from 2024 to 2025, while outcomes became more denial-heavy. The sharpest quarterly shift occurred from 2025 Q2 to Q3, when the grant rate fell by 16.8 percentage points and denial share rose by 11.5 percentage points; denial share continued rising in 2025 Q4 and 2026 Q1.

Note: Annual percentage-point changes compare 2025 to 2024; quarterly changes compare each quarter to the preceding quarter. Grant rates use grant/denial records as the denominator; denial and withdrawal shares use all completed bond records. Fractions report numerator/denominator. Other outcomes are included in total records but not separately shown.

Figure 1. National Monthly Bond Decisions by Outcome



Key point: Monthly bond-decision volume increased sharply in 2025, with denial-coded decisions rising especially steeply in late 2025 and early 2026. The vertical lines provide selected policy-context markers for the observed timing pattern.

Note: The figure plots monthly grant-, denial-, and withdrawal-coded records, excluding Other outcomes. Dotted lines mark Jan. 20 inauguration; July 8 ICE/Lyons Memo; Sept. 5 BIA Yajure Hurtado; and Nov. 10 candidate directive date. These markers provide descriptive timing context for detention volume, mandatory detention, IJ bond eligibility, and the candidate directive period.

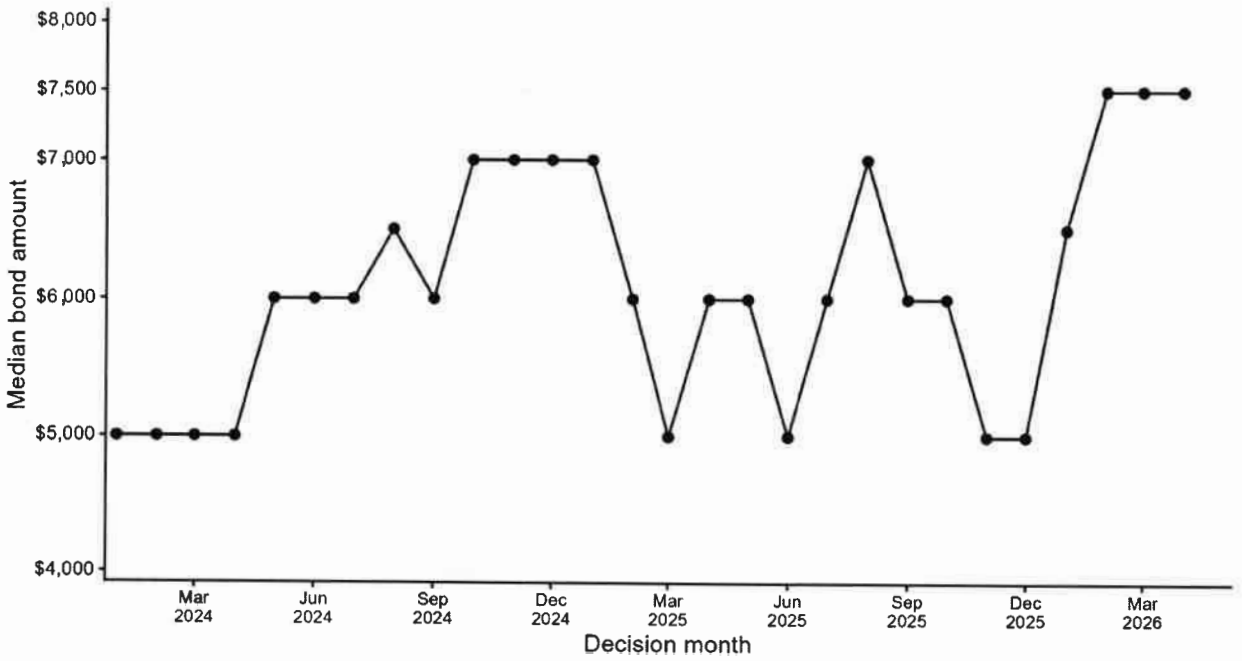
Table 3. Bond Amounts by Calendar Window

Window	Bond Records (n)	Median	Mean	90th Percentile	95th Percentile	Share > $50,000
Annual Comparisons						
2024	8,810	$6,000	$8,078	$12,000	$15,000	0.3% 26
2025	18,934	$6,000 ($0; 0.0%)	$7,597 (-$481; -6.0%)	$15,000 (+$3,000; +25.0%)	$18,000 (+$3,000; +20.0%)	0.3% (0.0 pp) 52
Quarterly Comparisons						
2025 Q1	3,244	$6,000	$7,343	$12,500	$15,000	0.2% 7
2025 Q2	7,403	$5,500 (-$500; -8.3%)	$7,309 (-$34; -0.5%)	$12,500 ($0; 0.0%)	$18,000 (+$3,000; +20.0%)	0.2% (0.0 pp) 13
2025 Q3	4,096	$6,250 (+$750; +13.6%)	$8,110 (+$801; +11.0%)	$15,000 (+$2,500; +20.0%)	$20,000 (+$2,000; +11.1%)	0.4% (+0.2 pp) 16
2025 Q4	4,191	$5,000 (-$1,250; -20.0%)	$7,801 (-$309; -3.8%)	$15,000 ($0; 0.0%)	$20,000 ($0; 0.0%)	0.4% (0.0 pp) 16
2026 Q1	**6,325**	**$7,500 (+$2,500; +50.0%)**	**$9,211 (+$1,410; +18.1%)**	$15,000 ($0; 0.0%)	**$21,800 (+$1,800; +9.0%)**	**0.4% (0.0 pp) 23**

Key point: National median bond amounts were stable from 2024 to 2025, but upper-tail amounts increased. In quarterly comparisons, 2026 Q1 showed the clearest increase in typical bond amounts, with the median rising to $7,500 and the mean rising to $9,211.

Note: Annual changes compare 2025 to 2024; quarterly changes compare each quarter to the immediately prior quarter. Bond statistics use grant-coded records with positive bond values. The "Share > $50,000" column reports the share and count of positive bond records above $50,000.

Figure 2. National Monthly Median Bond Amounts, January 2024–April 2026



Key point: Monthly median bond amounts rose in early 2026, reaching $7,500 in February and remaining there through April 2026.

Exh. B

Table 4. Court-Level Bond Amount Shifts from 2025 Q4 to 2026 Q1

Panel A. Courts with higher Q1 median bond amounts

Court Code	Bond Records Q4 / Q1	Median Bond Q4 / Q1 (Change)	Mean Bond Q4 / Q1 (Change)	P75 Bond Q4 / Q1 (Change)	P90 Bond Q4 / Q1 (Change)
MEM	24 / 70	$2,750 / $7,000 (+$4,250; +154.5%)	$5,562 / $7,143 (+$1,580; +28.4%)	$10,000 / $10,000 ($0; 0.0%)	$10,000 / $15,000 (+$5,000; +50.0%)
DET	208 / 296	$5,000 / $9,000 (+$4,000; +80.0%)	$9,168 / $9,564 (+$396; +4.3%)	$10,000 / $12,000 (+$2,000; +20.0%)	$15,000 / $15,000 ($0; 0.0%)
OTM	301 / 357	$2,000 / $5,000 (+$3,000; +150.0%)	$4,530 / $5,989 (+$1,459; +32.2%)	$5,000 / $7,500 (+$2,500; +50.0%)	$9,000 / $10,000 (+$1,000; +11.1%)
INP	13 / 6	$3,500 / $6,250 (+$2,750; +78.6%)	$8,731 / $6,417 (-$2,314; -26.5%)	$10,000 / $7,875 (-$2,125; -21.2%)	$23,000 / $11,500 (-$11,500; -50.0%)
ELZ	159 / 372	$7,500 / $10,000 (+$2,500; +33.3%)	$8,297 / $12,000 (+$3,703; +44.6%)	$10,000 / $15,000 (+$5,000; +50.0%)	$15,000 / $20,000 (+$5,000; +33.3%)
AUR	100 / 263	$7,500 / $10,000 (+$2,500; +33.3%)	$7,560 / $13,911 (+$6,351; +84.0%)	$10,000 / $20,000 (+$10,000; +100.0%)	$15,000 / $30,000 (+$15,000; +100.0%)
ATD	42 / 155	$5,000 / $7,500 (+$2,500; +50.0%)	$6,964 / $11,103 (+$4,139; +59.4%)	$9,625 / $10,000 (+$375; +3.9%)	$15,000 / $25,000 (+$10,000; +66.7%)
JNA	117 / 135	$7,500 / $10,000 (+$2,500; +33.3%)	$9,722 / $12,385 (+$2,663; +27.4%)	$13,000 / $15,000 (+$2,000; +15.4%)	$20,000 / $25,000 (+$5,000; +25.0%)
OAK	79 / 96	$7,500 / $10,000 (+$2,500; +33.3%)	$8,608 / $11,089 (+$2,481; +28.8%)	$10,000 / $15,000 (+$5,000; +50.0%)	$15,000 / $17,750 (+$2,750; +18.3%)
HGP	114 / 81	$5,750 / $8,000 (+$2,250; +39.1%)	$9,254 / $10,870 (+$1,616; +17.5%)	$10,000 / $10,000 ($0; 0.0%)	$15,000 / $20,000 (+$5,000; +33.3%)
ELO	83 / 195	$7,000 / $9,000 (+$2,000; +28.6%)	$8,870 / $9,836 (+$966; +10.9%)	$10,000 / $11,000 (+$1,000; +10.0%)	$15,000 / $18,000 (+$3,000; +20.0%)
FLO	88 / 116	$6,000 / $8,000 (+$2,000; +33.3%)	$6,767 / $8,573 (+$1,806; +26.7%)	$8,000 / $10,000 (+$2,000; +25.0%)	$10,000 / $15,000 (+$5,000; +50.0%)
LRO	51 / 113	$8,000 / $10,000 (+$2,000; +25.0%)	$8,353 / $9,615 (+$1,262; +15.1%)	$10,000 / $12,000 (+$2,000; +20.0%)	$15,000 / $15,000 ($0; 0.0%)
CHI	88 / 106	$3,000 / $5,000 (+$2,000; +66.7%)	$4,290 / $5,123 (+$833; +19.4%)	$5,000 / $7,500 (+$2,500; +50.0%)	$7,500 / $8,000 (+$500; +6.7%)
KAN	67 / 65	$8,000 / $10,000 (+$2,000; +25.0%)	$10,575 / $10,285 (-$290; -2.7%)	$10,000 / $10,000 ($0; 0.0%)	$20,000 / $20,000 ($0; 0.0%)
BLM	42 / 120	$3,000 / $4,000 (+$1,000; +33.3%)	$4,786 / $5,712 (+$927; +19.4%)	$7,375 / $7,000 (-$375; -5.1%)	$8,000 / $12,000 (+$4,000; +50.0%)
TAC	65 / 74	$9,000 / $10,000 (+$1,000; +11.1%)	$10,323 / $10,041 (-$283; -2.7%)	$12,000 / $12,750 (+$750; +6.2%)	$15,000 / $15,000 ($0; 0.0%)
SDC	128 / 309	$7,500 / $8,000 (+$500; +6.7%)	$7,699 / $8,806 (+$1,107; +14.4%)	$10,000 / $10,000 ($0; 0.0%)	$10,000 / $15,000 (+$5,000; +50.0%)
IMP	69 / 189	$2,000 / $2,500 (+$500; +25.0%)	$4,080 / $5,087 (+$1,008; +24.7%)	$5,000 / $5,000 ($0; 0.0%)	$10,000 / $10,000 ($0; 0.0%)
NYV	21 / 24	$7,500 / $8,000 (+$500; +6.7%)	$6,667 / $9,783 (+$3,117; +46.8%)	$7,500 / $12,500 (+$5,000; +66.7%)	$10,000 / $15,000 (+$5,000; +50.0%)

Panel B. Court-level distribution of Q4-to-Q1 changes

Measure	Courts with Higher Q1 Value	Courts with Same Q1 Value	Courts with Lower Q1 Value	Q1 Records in Higher-Value Courts	Q1 Record Share in Higher-Value Courts
Median	**20**	11	3	3,142 / 6,325	**49.7%**
Mean	**27**	0	7	5,410 / 6,325	**85.5%**
P75	18	12	4	3,537 / 6,325	55.9%
P90	19	11	4	3,335 / 6,325	52.7%

Key point: The Q1 2026 national bond-amount increase was geographically broad but heterogeneous. Panel A lists the 20 courts with higher Q1 median bond amounts. Eleven had unchanged medians (KRO, ADL, CHE/LOW, EPD, ANN/WAS, CIC, PSD, ORL, LVG, PEP/PIS, CLE), and three had lower medians (BTV, OMA, OTO). Upward mean movement was broader: 27 of 34 courts had higher Q1 means.

Note: Bond statistics use grant-coded records with positive recorded bond amounts. Q4 is Oct. 1–Dec. 31, 2025; Q1 is Jan. 1–Mar. 31, 2026. Panel A lists only courts with higher Q1 median bond amounts; Panel B summarizes all 34 courts with records in both quarters. P75 and P90 show whether shifts extended beyond the median. An unchanged Q4-to-Q1 median does not necessarily mean that a court had no bond-amount increase; it may reflect an increase that began during Q4 and persisted into Q1.

Exh. B

II. Alleged Directive-Period Bond-Amount Checks

The November-window checks in this section are narrower than the broader court-level comparisons reported later. They identify courts with short window increases around the candidate November period and then assess persistence. Other courts had higher post-period median bond amounts under the equal-length November 10 split, but those increases were not always cleanly timed to the November window and are reported separately in the circuit-level tables.

Table 5. Short-Window Screen for November Bond-Amount Jumps

Court Code	State	Timing	Windows Compared	Bond Records From/To	Median Bond From/To (Change)	Mean Bond From/To (Change)	P90 Bond From/To (Change)
ADL	CA	Nov. 10 window jump	Nov. 3-9, 2025 → Nov. 10-19, 2025	25 / 27	$6,000 / $10,000 (+66.7%)	$8,220 / $13,315 (+62.0%)	$11,500 / $22,000 (+91.3%)
ELO	AZ	Nov. 17 window jump	Nov. 10-16, 2025 → Nov. 17-30, 2025	10 / 12	$7,000 / $10,000 (+42.9%)	$7,150 / $12,042 (+68.4%)	$10,100 / $20,000 (+98.0%)
KRO	FL	Nov. 20 window jump	Nov. 10-19, 2025 → Nov. 20-30, 2025	35 / 22	$4,000 / $7,500 (+87.5%)	$4,414 / $11,341 (+156.9%)	$9,200 / $10,000 (+8.7%)
DET	MI	Nov. 20 window jump	Nov. 10-19, 2025 → Nov. 20-30, 2025	21 / 20	$8,000 / $13,750 (+71.9%)	$10,476 / $12,550 (+19.8%)	$15,000 / $20,000 (+33.3%)
SDC	GA	Nov. 20 window jump	Nov. 10-19, 2025 → Nov. 20-30, 2025	17 / 18	$5,000 / $7,250 (+45.0%)	$5,912 / $9,250 (+56.5%)	$10,000 / $12,900 (+29.0%)
JNA	LA	Nov. 20 window jump	Nov. 10-19, 2025→ Nov. 20-30, 2025	15 / 10	$7,500 / $9,500 (+26.7%)	$7,600 / $10,650 (+40.1%)	$12,600 / $20,200 (+60.3%)
CIC	TX	Nov. 20 window jump	Nov. 10-19, 2025 → Nov. 20-30, 2025	22 / 27	$8,000 / $10,000 (+25.0%)	$8,227 / $9,278 (+12.8%)	$11,800 / $15,000 (+27.1%)

Key point: The weekly screen identifies short-window November bond-amount jumps at Adelanto, Eloy, Krome, Detroit, Lumpkin/Stewart, Jena, and Conroe. Table 6 evaluates whether the increases persisted over a longer five-month pre/post period.

Note: This screening table is descriptive. Weekly and short-window comparisons can be sensitive to small record counts and court-specific timing. ELO is included based on the Nov. 17 extended window because the strict one-week post window contained only five positive-bond records, while the extended window showed the same median increase with a larger post-window cell. The screen is limited to short-window increases around the November candidate period; other courts may have had monthly median increases outside that period.

Table 6. Five-Month Pre / Post Bond Amount Persistence Check for Selected Nov. Candidate Courts

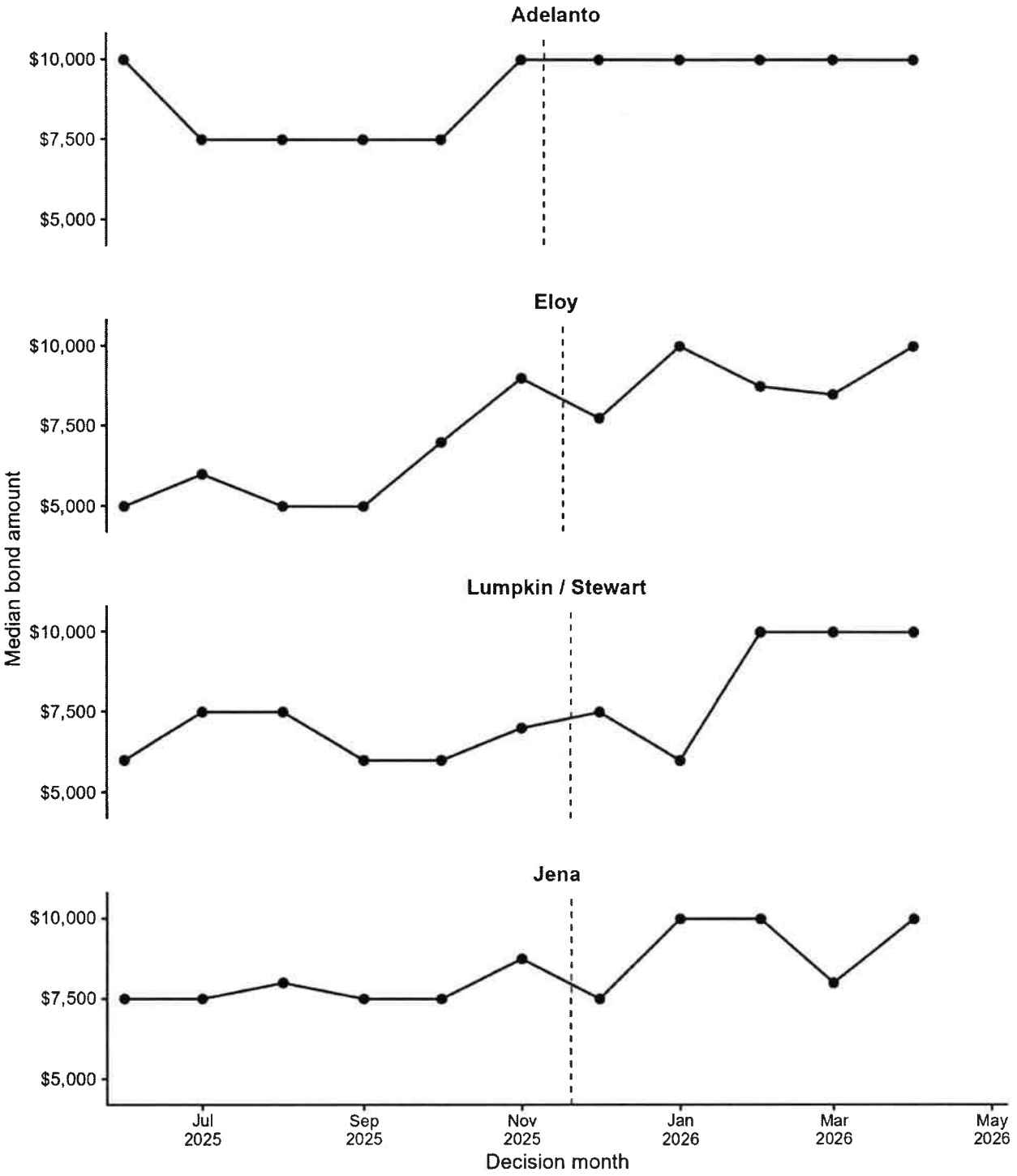
Court Code	Split	Bond Records Pre / Post	Median Bond Pre / Post (Change)	Mean Bond Pre / Post (Change)	P75 Bond Pre / Post (Change)	Interpretation
ADL	Nov. 10	466 / 750	$7,500 / $10,000 **(+33.3%)**	$10,078 / $13,693 **(+35.9%)***	$11,000 / $15,000 **(+36.4%)**	Persistent median increase
ELO	Nov. 17	217 / 274	$5,500 / $9,000 **(+63.6%)**	$6,970 / $10,172 **(+45.9%)***	$9,000 / $12,000 **(+33.3%)**	Persistent median increase
SDC	Nov. 20	314 / 501	$6,000 / $8,000 **(+33.3%)**	$7,926 / $9,300 **(+17.3%)***	$10,000 / $10,000 (0.0%)	Persistent median increase
JNA	Nov. 20	309 / 221	$7,500 / $10,000 **(+33.3%)**	$8,489 / $11,609 **(+36.8%)***	$10,000 / $15,000 **(+50.0%)**	Persistent median increase
KRO	Nov. 20	581 / 739	$5,000 / $5,000 (0.0%)	$9,301 / $12,102 **(+30.1%)***	$7,000 / $10,000 **(+42.9%)**	Mean/P75 shift, not median
DET	Nov. 20	76 / 553	$8,000 / $8,000 (0.0%)	$13,901 / $9,683 (-30.3%)*	$12,125 / $12,000 (-1.0%)	No persistent median increase
CIC	Nov. 20	628 / 451	$8,000 / $8,000 (0.0%)	$9,082 / $9,949 **(+9.5%)**	$10,000 / $12,000 **(+20.0%)**	Mean/P75 shift, not median

Key point: Adelanto, Eloy, Lumpkin/Stewart, and Jena showed persistent median bond increases. Krome and Conroe showed higher mean and P75 amounts without median increases. Detroit did not show a clear persistent increase. Detroit's mean decline should be read cautiously because its bond sample records increased from 76 to 553 records.

*Note: Pre-periods cover five months before each split date; post-periods run through Apr. 30, 2026. Bond statistics use grant-coded positive recorded bonds; * indicates $p < 0.05$ from a log-scale Welch t-test for mean bonds.*

Exh. B

Figure 3. Monthly Median Recorded Bond Amounts in Persistent-Increase Court / Code



Key point: Adelanto, Eloy, Lumpkin/Stewart, and Jena show higher monthly median bond amounts after their November candidate split dates.

Note: Monthly medians use grant-coded records with positive recorded bond amounts. Dashed vertical lines mark the candidate split dates used in Table 5. The figure is descriptive and should be read with the five-month pre/post persistence checks in Table 6.

III. Court-Level Comparisons by Circuit Using Equal-Length November 10 Split

The following tables provide broader circuit- and court-level context for post-period patterns using an equal-length split around November 10, 2025. The pre-period is May 22, 2025 through November 9, 2025, and the post-period is November 10, 2025 through April 30, 2026. These tables are descriptive and should not be read to mean that every post-period increase was cleanly timed to the November window. "Pre/Post (Change)" cells report the pre-period value, post-period value, and change in parentheses. Bond statistics use grant-coded records with positive new_bond amounts. Grant rates use grant/denial outcomes as the denominator. Denial and withdrawal shares use all completed bond records in each period. WD means withdrawal.

Table 7. Circuit-Level Summary Using Equal-Length Nov. 10, 2025 Split

Circuit (n)	Decisions Pre / Post	Positive Bonds Pre / Post	Median Bond Pre / Post (Change)	Mean Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
1st (1)	1,545 / 1,673	487 / 784	$5,000 / $5,000 (0.0%)	$6,666 / $6,833 (+2.5%)	49.4% / 58.5% (+9.2 pp)*	33.3% / 33.8% (+0.4 pp)	29.8% / 15.7% (-14.1 pp)*
2nd (2)	1,146 / 1,165	231 / 412	$7,500 / $10,000 **(+33.3%)**	$8,255 / $11,745 **(+42.3%)***	35.7% / 44.2% (+8.5 pp)*	37.1% / 45.0% **(+7.9 pp)***	37.9% / 12.5% (-25.3 pp)*
3rd (1)	2,472 / 3,284	416 / 590	$6,500 / $10,000 **(+53.8%)**	$8,016 / $11,288 **(+40.8%)***	33.0% / 25.5% **(-7.4 pp)***	45.0% / 57.6% **(+12.7 pp)***	32.2% / 20.5% (-11.7 pp)*
4th (1)	991 / 1,327	387 / 548	$5,000 / $5,000 (0.0%)	$5,080 / $6,773 **(+33.3%)***	45.1% / 46.9% (+1.8 pp)	49.1% / 49.7% (+0.5 pp)	7.6% / 6.1% (-1.5 pp)
5th (8)	14,069 / 13,361	3,044 / 2,353	$7,500 / $7,500 (0.0%)	$8,172 / $8,610 **(+5.4%)***	31.4% / 23.4% **(-7.9 pp)***	49.3% / 61.9% **(+12.6 pp)***	19.3% / 12.2% (-7.1 pp)*
6th (3)	1,922 / 3,267	203 / 759	$10,000 / $7,500 (-25.0%)	$13,399 / $9,889 (-26.2%)*	21.0% / 30.0% (+9 pp)*	46.1% / 57.6% (+11.4 pp)*	40.6% / 16.0% (-24.7 pp)*
7th (2)	791 / 790	230 / 224	$5,000 / $5,000 (0.0%)	$5,757 / $5,098 (-11.4%)	48.1% / 37.6% (-10.6 pp)*	40.6% / 50.9% (+10.3 pp)*	17.2% / 16.5% (-0.7 pp)
8th (3)	1,404 / 1,228	251 / 343	$7,000 / $5,000 (-28.6%)	$7,914 / $7,430 (-6.1%)	24.7% / 34.0% (+9.3 pp)*	58.5% / 58.4% (-0.2 pp)	17.8% / 9.4% (-8.4 pp)*
9th (7)	6,976 / 10,119	1,701 / 2,691	$5,000 / $6,000 **(+20.0%)**	$7,209 / $8,546 **(+18.5%)***	38.1% / 35.6% (-2.5 pp)*	41.4% / 50.6% **(+9.2 pp)***	24.2% / 15.8% (-8.5 pp)*
10th (2)	2,471 / 2,912	343 / 594	$8,000 / $9,750 **(+21.9%)**	$10,466 / $11,307 **(+8.0%)**	22.8% / 27.6% (+4.8 pp)*	47.8% / 56.0% **(+8.2 pp)***	26.3% / 16.0% (-10.3 pp)*
11th (3)	5,511 / 7,650	1,206 / 1,808	$5,000 / $7,000 **(+40.0%)**	$8,127 / $10,175 **(+25.2%)**	38.8% / 34.4% **(-4.4 pp)***	36.5% / 47.2% **(+10.7 pp)***	34.1% / 21.4% (-12.7 pp)*

Key point: The equal-length November 10 split shows circuit-level heterogeneity: bond amounts increased in some circuits but not others, while denial shares generally rose and withdrawal shares generally fell.

Note: Parenthetical n reports the number of national-sample court codes within that circuit's geographic jurisdiction. Asterisks indicate $p < 0.05$ from descriptive checks: Welch t-tests for mean bonds and two-proportion tests for rates/shares.

Table 8. First Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Chelmsford - MA (CHE/LOW)	1,545 / 1,673	487 / 784	$6,666 / $6,833 (+2.5%)	$5,000 / $5,000 (0.0%)	49.4% / 58.5% (+9.2 pp)	33.3% / 33.8% (+0.4 pp)	29.8% / 15.7% (-14.1 pp)

Key point: Within the First Circuit comparison, Chelmsford had a flat post-period median bond amount and a modestly higher mean bond amount. The grant rate increased, denial share was essentially flat, and withdrawal share fell.

Table 9. Second Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Batavia - NY (BTV)	895 / 851	186 / 362	**$8,449 / $12,114 (+43.4%)**	**$7,500 / $10,000 (+33.3%)**	37.3% / 50.1% (+12.8 pp)	**35.9% / 42.4% (+6.6 pp)**	37.5% / 8.6% (-29.0 pp)
New York - NY (NYV)	251 / 314	45 / 50	**$7,456 / $9,076 (+21.7%)**	$7,500 / $7,500 (0.0%)	30.2% / 24.2% (-6.0 pp)	**41.4% / 51.9% (+10.5 pp)**	39.0% / 23.2% (-15.8 pp)

Key point: Within the Second Circuit comparison, Batavia had higher post-period mean and median bond amounts, while New York had a higher mean but unchanged median. Denial shares increased at both court codes, though Batavia's grant rate also increased.

Table 10. Third Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Elizabeth - NJ (ELZ)	2,472 / 3,284	416 / 590	**$8,016 / $11,288 (+40.8%)**	**$6,500 / $10,000 (+53.8%)**	**33.0% / 25.5% (-7.4 pp)**	**45.0% / 57.6% (+12.7 pp)**	32.2% / 20.5% (-11.7 pp)

Key point: Within the Third Circuit comparison, Elizabeth had a substantial post-period increase in median and mean bond amounts, alongside a lower grant rate, higher denial share, and lower withdrawal share.

Table 11. Fourth Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Annandale - VA (ANN/WAS)	991 / 1,327	387 / 548	**$5,080 / $6,773 (+33.3%)**	$5,000 / $5,000 (0.0%)	45.1% / 46.9% (+1.8 pp)	49.1% / 49.7% (+0.5 pp)	7.6% / 6.1% (-1.5 pp)

Key point: Within the Fourth Circuit comparison, Annandale/Washington had a flat post-period median bond amount but a higher mean bond amount. Grant rate and denial share were fairly stable, while withdrawal share declined.

Table 12. Fifth Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Jena - LA (JNA)	2,203 / 1,646	417 / 236	$8,448 / $11,354 (+34.4%)	**$7,500 / $9,500 (+26.7%)**	27.6% / 20.3% (-7.3 pp)	**52.7% / 63.4% (+10.6 pp)**	22.9% / 15.2% (-7.7 pp)
Oakdale - LA (OAK)	1,816 / 1,560	273 / 158	$9,359 / $10,639 (+13.7%)	**$8,000 / $10,000 (+25.0%)**	21.8% / 15.0% (-6.8 pp)	**55.6% / 67.6% (+12 pp)**	24.4% / 14.7% (-9.7 pp)
Los Fresnos - TX (PEP, PIS)	1,538 / 759	500 / 209	$5,225 / $5,868 (+12.3%)	$5,000 / $5,000 (0.0%)	48.6% / 35.1% (-13.5 pp)	**36.2% / 51.1% (+14.9 pp)**	25.4% / 19.6% (-5.7 pp)
Conroe- TX (CIC)	3,238 / 3,337	829 / 473	$8,849 / $9,869 (+11.5%)	$8,000 / $8,000 (0.0%)	37.7% / 18.1% (-19.6 pp)	**43.1% / 67.2% (+24.2 pp)**	29.8% / 15.5% (-14.2 pp)
Houston - TX (HGP)	331 / 1,032	78 / 183	$10,635 / $11,645 (+9.5%)	**$7,500 / $8,000 (+6.7%)**	33.3% / 24.2% (-9.1 pp)	**48.3% / 58.5% (+10.2 pp)**	25.7% / 19.4% (-6.3 pp)
El Paso - TX (EPD)	2,060 / 2,354	410 / 652	$6,163 / $6,258 (+1.5%)	$5,000 / $5,000 (0.0%)	37.2% / 40.4% (+3.2 pp)	**35.1% / 43.2% (+8 pp)**	0.8% / 2.6% (+1.9 pp)
Pearsall - TX (PSD)	2,152 / 1,924	430 / 264	$9,316 / $8,197 (-12.0%)	$7,750 / $7,500 (-3.2%)	24.2% / 16.0% (-8.2 pp)	**65.5% / 76.6% (+11.1 pp)**	10.9% / 7.1% (-3.8 pp)
Laredo - TX (LRO)	731 / 749	107 / 178	$13,888 / $9,146 (-34.1%)	$10,000 / $8,000 (-20.0%)	18.0% / 31.7% (+13.7 pp)	71.7% / 60.2% (-11.5 pp)	11.1% / 11.3% (+0.3 pp)

Key point: Within the Fifth Circuit comparison, Jena and Oakdale showed the strongest bond-amount and outcome shifts: median and mean bond amounts increased, grant rates fell, and denial shares rose. Other courts had mostly flat or lower medians but higher mean bonds at Los Fresnos, Conroe, Houston, and El Paso and higher denial shares at five of six courts shown.

Table 13. Sixth Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Cleveland - OH (CLE)	727 / 582	118 / 92	$13,881 / $13,842 (-0.3%)	$10,000 / $10,000 (0.0%)	**26.2% / 19.8% (-6.4 pp)**	**48.1% / 66.3% (+18.2 pp)**	33.6% / 16.5% (-17.1 pp)
Memphis - TN (MEM)	316 / 776	16 / 93	$8,469 / $7,075 (-16.5%)	$8,750 / $5,000 (-42.9%)	6.9% / 14.5% (+7.6 pp)	76.9% / 72.8% (-4.1 pp)	16.1% / 12.9% (-3.3 pp)
Detroit - MI (DET)	879 / 1,909	69 / 574	$13,717 / $9,712 (-29.2%)	$7,500 / $8,000 (+6.7%)	24.2% / 39.8% (+15.6 pp)	33.4% / 48.7% (+15.3 pp)	55.3% / 17.1% (-38.2 pp)

Key point: Within the Sixth Circuit comparison, bond-amount patterns were mixed: Cleveland's median remained high and flat, Memphis's median declined, and Detroit's median increased slightly while its mean declined. Memphis's small pre-period bond count and Detroit's large pre/post bond-count imbalance counsel caution because those bond-amount comparisons may be more sensitive to a few records and to changes in the composition of cases receiving positive bonds.

Table 14. Seventh Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Indianapolis - IN (INP)	218 / 247	52 / 22	$7,154 / $6,705 (-6.3%)	$5,000 / $5,500 (+10.0%)	31.9% / 10.4% (-21.5 pp)	51.8% / 83.4% (+31.6 pp)	19.3% / 5.7% (-13.6 pp)
Chicago - IL (CHI)	573 / 543	178 / 202	$5,348 / $4,923 (-7.9%)	$5,000 / $5,000 (0.0%)	54.1% / 52.7% (-1.4 pp)	36.3% / 36.1% (-0.2 pp)	16.4% / 21.4% (+5.0 pp)

Key point: Within the Seventh Circuit comparison, Indianapolis showed a small post-period median increase but with a relatively small post-period bond amount count, while Chicago's median was unchanged. Indianapolis also had a lower grant rate and sharply higher denial share.

Exh. B

Table 15. Eighth Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Kansas City - MO (KAN)	483 / 473	87 / 141	**$9,138 / $10,014 (+9.6%)**	**$7,500 / $10,000 (+33.3%)**	**21.2% / 35.4% (+14.2 pp)**	**66.9% / 57.1% (-9.8 pp)**	11.4% / 10.6% (-0.8 pp)
Omaha - NE (OMA)	551 / 361	91 / 39	$7,143 / $6,218 (-12.9%)	$6,000 / $6,000 (0.0%)	26.2% / 16.0% (-10.2 pp)	55.2% / 75.3% (+20.2 pp)	18.1% / 8.3% (-9.8 pp)
Fort Snelling - MN (BLM)	370 / 394	73 / 163	$7,418 / $5,485 (-26.1%)	$7,000 / $3,500 (-50.0%)	27.8% / 49.3% (+21.5 pp)	52.7% / 44.4% (-8.3 pp)	25.7% / 9.1% (-16.5 pp)

Key point: Within the Eighth Circuit comparison, Kansas City had higher post-period median and mean bond amounts, while Omaha had a flat median and Fort Snelling had lower median and mean bond amounts. Outcome shifts were heterogeneous across the three court codes.

Table 16. Ninth Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Imperial - CA (IMP)	440 / 817	95 / 295	$3,537 / $5,593 (+58.1%)	$2,500 / $2,500 (0.0%)	30.3% / 48.5% (+18.2 pp)	54.3% / 40.1% (-14.2 pp)	21.6% / 20.4% (-1.2 pp)
Eloy - AZ (ELO)	1,204 / 1,254	260 / 284	$6,950 / $10,065 (+44.8%)	**$5,000 / $9,000 (+80.0%)**	39.4% / 32.5% (-6.8 pp)	**34.3% / 48.0% (+13.7 pp)**	10.1% / 4.5% (-5.6 pp)
Adelanto - CA (ADL)	2,317 / 4,110	492 / 750	$10,226 / $13,693 (+33.9%)	**$7,500 / $10,000 (+33.3%)**	34.3% / 25.7% (-8.6 pp)	**43.5% / 57.4% (+13.9 pp)**	32.1% / 20.3% (-11.8 pp)
Florence - AZ (FLO)	818 / 712	222 / 188	$7,207 / $8,108 (+12.5%)	**$6,000 / $7,500 (+25.0%)**	42.5% / 35.1% (-7.4 pp)	**37.4% / 51.3% (+13.9 pp)**	22.9% / 14.5% (-8.4 pp)
Otay Mesa - CA (OTM)	958 / 1,645	297 / 709	$5,372 / $5,575 (+3.8%)	$4,500 / $3,500 (-22.2%)	47.5% / 55.3% (+7.7 pp)	**35.3% / 35.9% (+0.6 pp)**	30.2% / 16.6% (-13.6 pp)
Tacoma - WA (TAC)	577 / 751	73 / 127	$10,363 / $10,496 (+1.3%)	$10,000 / $10,000 (0.0%)	19.4% / 21.7% (+2.4 pp)	**57.0% / 67.1% (+10.1 pp)**	28.4% / 13.6% (-14.8 pp)
Las Vegas - NV (LVG)	662 / 830	262 / 338	$4,336 / $4,164 (-4.0%)	$4,000 / $3,500 (-12.5%)	51.2% / 48.6% (-2.7 pp)	**38.5% / 44.9% (+6.4 pp)**	13.3% / 7.1% (-6.2 pp)

Key point: In the Ninth Circuit comparison, Adelanto, Eloy, and Florence showed higher post-period median bond amounts, lower grant rates, and higher denial shares. Denial shares increased at six of the seven court codes shown.

Table 17. Tenth Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	Decisions Pre / Post	Bonds Pre / Post	Mean Bond Pre / Post (Change)	Median Bond Pre / Post (Change)	Grant Rate Pre / Post (Change)	Denial Share Pre / Post (Change)	WD Share Pre / Post (Change)
Otero - NM (OTO)	1,105 / 1,145	185 / 193	**$9,454 / $9,858 (+4.3%)**	$7,500 / $7,500 (0.0%)	21.7% / 21.1% (-0.6 pp)	**61.3% / 65.2% (+3.9 pp)**	1.2% / 1.8% (+0.7 pp)
Aurora - CO (AUR)	1,366 / 1,767	158 / 401	**$11,652 / $12,005 (+3.0%)**	**$9,250 / $10,000 (+8.1%)**	24.2% / 32.3% (+8.1 pp)	**37.0% / 50.1% (+13.1 pp)**	46.6% / 25.2% (-21.4 pp)

Key point: Within the Tenth Circuit comparison, Aurora had a higher post-period median bond amount and a substantially higher denial share, while Otero's median was unchanged and its denial share increased modestly. The Tenth Circuit bond amount increase therefore appears driven primarily by Aurora, which had both the higher post-period median and the larger post-period positive-bond count.

Table 18. Eleventh Circuit Court Comparison Using Equal-Length Nov. 10, 2025 Split

Court Information	Record Counts		Bond Amounts		Outcome Measures		
City, State, and Court Code	**Decisions Pre / Post**	**Bonds Pre / Post**	**Mean Bond Pre / Post (Change)**	**Median Bond Pre / Post (Change)**	**Grant Rate Pre / Post (Change)**	**Denial Share Pre / Post (Change)**	**WD Share Pre / Post (Change)**
Miami - FL (KRO)	3,425 / 3,462	770 / 774	**$8,418 / $11,755 (+39.6%)**	$5,000 / $5,000 (0.0%)	45.6% / 36.1% (-9.5 pp)	**28.4% / 41.3% (+12.9 pp)**	44.9% / 28.2% (-16.7 pp)
Orlando - FL (ORL)	90 / 950	32 / 281	**$5,047 / $6,256 (+24.0%)**	$5,000 / $5,000 (0.0%)	57.0% / 38.1% (-18.8 pp)	**37.8% / 51.3% (+13.5 pp)**	12.2% / 17.2% (+4.9 pp)
Lumpkin - GA (SDC)	1,975 / 2,454	400 / 518	**$7,778 / $9,189 (+18.1%)**	**$7,000 / $8,000 (+14.3%)**	29.3% / 28.2% (-1.1 pp)	**50.1% / 54.6% (+4.6 pp)**	16.7% / 13.4% (-3.3 pp)

Key point: Within the Eleventh Circuit comparison, Lumpkin had higher post-period mean and median bond amounts, while Krome had a higher mean but unchanged median. Grant rates fell and denial shares increased at all three courts shown.

IV. Supplemental Context for Imperial and Other Courts under the Ninth Circuit

This supplemental section provides additional context for Imperial and selected courts under the Ninth Circuit. Imperial is shown separately because its post-period pattern differs from the general Ninth Circuit denial-share pattern reported in Table 16 and because its nationality composition changed during the same period. The tables and figures below are descriptive; the timing markers are included to show temporal alignment with selected legal and policy events, not to isolate causation.

Table 19. Imperial Nationality Composition Changes, Pre/Post November 10 Split

Nationality Code	Pre Decisions	Post Decisions	Pre Share	Post Share	Share Change
MX	150	199	34.2%	24.4%	**-9.9 pp**
GT	63	53	14.4%	6.5%	**-7.9 pp**
IN	27	109	6.2%	13.4%	**+7.2 pp**
CH	21	68	4.8%	8.3%	**+3.5 pp**
ES	21	64	4.8%	7.8%	**+3 pp**
NU	15	8	3.4%	1.0%	-2.4 pp
CO	5	26	1.1%	3.2%	+2 pp
UZ	0	14	0.0%	1.7%	+1.7 pp
CU	16	20	3.7%	2.5%	-1.2 pp
RU	15	19	3.4%	2.3%	-1.1 pp
VE	14	34	3.2%	4.2%	+1 pp
HO	16	22	3.7%	2.7%	-1 pp
GV	1	9	0.2%	1.1%	+0.9 pp
ET	2	10	0.5%	1.2%	+0.8 pp
SO	1	8	0.2%	1.0%	+0.8 pp
All other codes	71	153	16.2%	18.8%	+2.5 pp

Key point: Imperial's nationality composition changed materially after the November 10 split. The MX and GT shares declined from 34.2% to 24.4% and from 14.4% to 6.5%, respectively, while the IN, CH, and ES shares increased from 6.2% to 13.4%, from 4.8% to 8.3%, and from 4.8% to 7.8%, respectively.

Note: The table uses records with nonmissing nationality codes. For readability, it displays nationality codes with an absolute pre/post share change of at least 0.8 percentage points, plus all remaining nationality codes grouped as "All other codes." Pre/post shares use the nationality-coded Imperial decision records as the denominator: 438 pre-period records and 816 post-period records. Nationality values are reported as recorded in the source data.

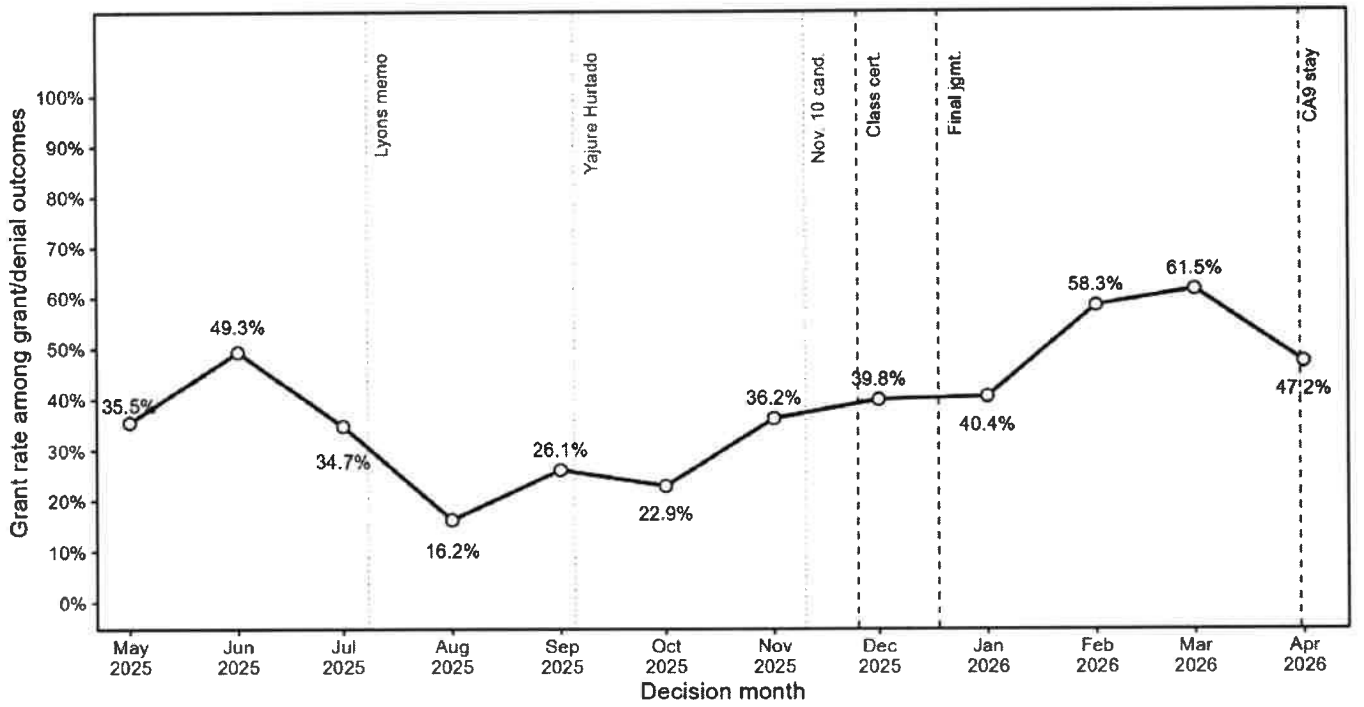
Table 20. Imperial Monthly Grant Rates and Outcome Counts, May 2025-April 2026

Month	Total Records	Grant/Denial Records	Grants	Denials	Withdrawals	Grant Rate	Denial Share	Context Marker
May 2025	86	62	22	40	24	35.5%	46.5%	-
June 2025	92	71	35	36	21	49.3%	39.1%	-
July 2025	100	72	25	47	26	34.7%	47.0%	Lyons memo
August 2025	83	68	11	57	15	16.2%	68.7%	-
September 2025	82	69	18	51	13	26.1%	62.2%	*Yajure Hurtado*
October 2025	47	35	8	27	12	22.9%	57.4%	-
November 2025	55	47	17	30	8	36.2%	54.5%	Nov. 10 split
December 2025	167	113	45	68	50	39.8%	40.7%	*Maldonado* cert./jmt.
January 2026	175	136	55	81	38	40.4%	46.3%	-
February 2026	108	96	56	40	10	58.3%	37.0%	-
March 2026	191	143	88	55	44	61.5%	28.8%	-
April 2026	127	108	51	57	17	47.2%	44.9%	CA9 stay

Key point: Imperial's grant rate rose after November, from 22.9% in October 2025 to 39.8% in December, 58.3% in February, and 61.5% in March, before falling to 47.2% in April 2026. This post-November increase occurred alongside higher monthly volume, especially from December 2025 through April 2026.

Note: Grant rate is grants divided by grant/denial records; denial share is denials divided by total records. Withdrawals and Other outcomes are included in total records but excluded from the grant-rate denominator. The Other category is not separately shown. Context markers correspond to selected timing events shown in Figures 4 and 5 and are descriptive.

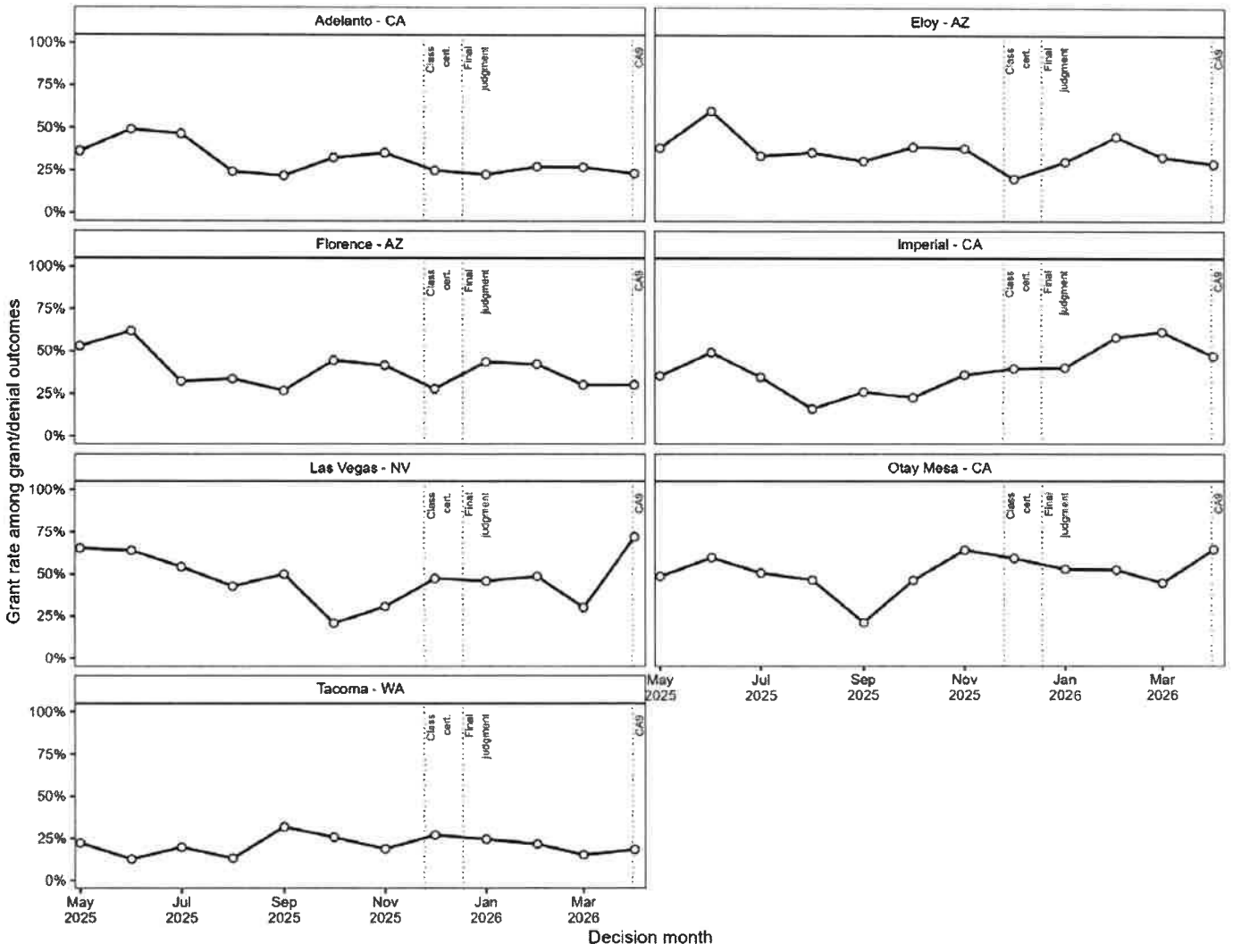
Figure 4. Imperial Monthly Grant Rate with *Maldonado Bautista* Timing Markers



Key point: Imperial's monthly grant rate increased in late 2025 and early 2026 after reaching lower points in August and October 2025. The figure shows the increase visually, while Table 20 provides the monthly counts underlying the plotted rates.

Note: Monthly grant rate is calculated among grant/denial outcomes. The vertical markers identify selected legal and policy timing events, including Maldonado Bautista-related timing markers. The figure is descriptive and does not isolate the effect of any single event.

Figure 5. Ninth Circuit Monthly Grant Rates with *Maldonado Bautista* Timing Markers



Key point: This comparison shows heterogeneity across courts under the Ninth Circuit's jurisdiction. Imperial's post-November increase is visible, but the other courts do not show a uniform monthly grant-rate pattern: Adelanto and Tacoma remained comparatively low, while Eloy, Florence, Las Vegas, and Otay Mesa fluctuated across the same period.

Note: Monthly grant rates are calculated among grant/denial outcomes. The vertical timing markers are included for descriptive comparison across courts. Monthly values may be sensitive to court-specific volume and case mix, so the figure should be read together with Tables 16, 19, and 20.

Exhibit C. Courts Included in the National Declaration Sample

This exhibit identifies the courts included in the national declaration sample, the underlying EOIR base city court code(s) used for each court, and selected record counts and rates for the January 1, 2024 through April 30, 2026 analysis window.

Base City Code(s)	Lookup City/State	Completed Records	Grant Records	Denial Records	Withdrawal Records	Other Records	Grant/Denial Records	Grant Rate	Denial Share	WD Share	Positive Recorded Bonds
KRO	MIAMI, FL	12,013	3,220	3,759	4,636	398	6,979	46.1%	31.3%	38.6%	3,048
CIC	CONROE, TX	11,631	3,381	5,204	2,806	240	8,585	39.4%	44.7%	24.1%	3,308
ELZ	ELIZABETH, NJ	10,381	2,577	4,594	3,056	154	7,171	35.9%	44.3%	29.4%	2,350
ADL	ADELANTO, CA	8,555	1,843	4,109	2,403	200	5,952	31.0%	48.0%	28.1%	1,728
SDC	LUMPKIN, GA	8,004	2,052	3,889	1,028	1,035	5,941	34.5%	48.6%	12.8%	2,015
JNA	JENA, LA	7,675	1,567	3,935	1,878	295	5,502	28.5%	51.3%	24.5%	1,487
AUR	AURORA, CO	6,978	1,545	2,490	2,795	148	4,035	38.3%	35.7%	40.1%	1,498
EPD	EL PASO, TX	6,960	1,691	2,733	125	2,411	4,424	38.2%	39.3%	1.8%	1,616
PSD	PEARSALL, TX	6,474	1,480	4,192	676	126	5,672	26.1%	64.8%	10.4%	1,439
OAK	OAKDALE, LA	6,326	845	3,590	1,313	578	4,435	19.1%	56.7%	20.8%	762
ELO	ELOY, AZ	6,094	1,276	1,812	302	2,704	3,088	41.3%	29.7%	5.0%	1,258
CHE/LOW	CHELMSFORD, MA	5,100	1,754	1,670	1,519	157	3,424	51.2%	32.7%	29.8%	1,722
PEP/PIS	LOS FRESNOS, TX	4,513	1,586	1,623	1,111	193	3,209	49.4%	36.0%	24.6%	1,541
OTM	OTAY MESA, CA	4,429	1,495	1,579	1,201	154	3,074	48.6%	35.7%	27.1%	1,456
FLO	FLORENCE, AZ	4,333	1,048	1,500	1,259	526	2,548	41.1%	34.6%	29.1%	1,017
DET	DETROIT, MI	4,322	810	1,867	1,592	53	2,677	30.3%	43.2%	36.8%	696
ANN/WAS	ANNANDALE, VA	3,626	1,679	1,661	232	54	3,340	50.3%	45.8%	6.4%	1,631
OTO	OTERO, NM	3,503	624	2,094	44	741	2,718	23.0%	59.8%	1.3%	610
BTV	BATAVIA, NY	3,210	757	1,129	1,088	236	1,886	40.1%	35.2%	33.9%	745
CHI	CHICAGO, IL	3,088	1,209	912	882	85	2,121	57.0%	29.5%	28.6%	988
LVG	LAS VEGAS, NV	2,540	1,053	1,075	274	138	2,128	49.5%	42.3%	10.8%	1,030
TAC	TACOMA, WA	2,337	363	1,302	646	26	1,665	21.8%	55.7%	27.6%	363
LRO	LAREDO, TX	2,272	742	1,193	306	31	1,935	38.3%	52.5%	13.5%	692
CLE	CLEVELAND, OH	1,989	395	980	586	28	1,375	28.7%	49.3%	29.5%	382
KAN	KANSAS CITY, MO	1,867	328	1,259	247	33	1,587	20.7%	67.4%	13.2%	318
IMP	IMPERIAL, CA	1,757	602	669	468	18	1,271	47.4%	38.1%	26.6%	577
BLM	FORT SNELLING, MN	1,600	418	773	362	47	1,191	35.1%	48.3%	22.6%	403
OMA	OMAHA, NE	1,425	223	862	270	70	1,085	20.6%	60.5%	18.9%	186
HGP	HOUSTON, TX	1,363	273	764	285	41	1,037	26.3%	56.1%	20.9%	261
MEM	MEMPHIS, TN	1,148	121	836	170	21	957	12.6%	72.8%	14.8%	118
ORL	Orlando, FL	1,047	349	523	174	1	872	40.0%	50.0%	16.6%	317
NYV	NEW YORK, NY	831	166	393	242	30	559	29.7%	47.3%	29.1%	159
ATD	ATLANTA, GA	806	262	369	166	9	631	41.5%	45.8%	20.6%	240
INP	INDIANAPOLIS, IN	564	102	343	104	15	445	22.9%	60.8%	18.4%	97

Note: Rows met inclusion thresholds of ≥500 completed records and ≥50 positive recorded new_bond records, applied after same-location groupings (CHE/LOW, PEP/PIS, ANN/WAS). Grant rate uses grant/denial records as the denominator. Denial and withdrawal shares use all completed records as the denominator. Positive recorded bonds are coverage counts; bond-amount analyses use grant-coded positive new_bond records. WD means withdrawal. SDC = Lumpkin/Stewart; EPD includes El Paso/Bluebonnet-related hearing locations.