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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JOSE NAZARIO BARBERRA ROMERO; IGNACIO AGUIRRE CALIXTO; LEOBARDO GOMEZ LOPEZ; GERMAN JIMINEZ-JIMINEZ; JORDIN DANDY RIOS VARGAS,
Petitioners,
v.

JOHN MATTOS, Warden of Nevada Southern Detention Center, RUBEN LEYVA, Acting Director of the Salt Lake City Field Office for Enforcement and Removal Operations of U.S. Immigration and Customs Enforcement; DAVID J. VENTURELLA, Acting Director of U.S. Immigration and Customs Enforcement; MARKWAYNE MULLINS, Secretary of the Department of Homeland Security; TODD BLANCHE, Acting U.S. Attorney General,
Respondents.

Case No. 2:26-cv-02222

Joint Petition for Writ of Habeas Corpus for Class Members of *Jacobo Ramirez v. Mullin, et al.*, No. 2:25-cv-02136-RFB-MDC (D. Nev. Mar. 30, 2026).

JOINT HABEAS PETITION AS MEMBERS OF *JACOBO RAMIREZ* CLASS

I. Introduction

Last year, the Department of Homeland Security (DHS) began to systemically misclassify immigration detainees to deny them bond hearings. This practice is contrary to decades of settled law and policy. On September 5, 2025, the government cemented the practice through the Board of Immigration Appeals' (BIA) precedential decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (B.I.A. 2025) (*Matter of Hurtado*). That decision unlawfully compels all Immigration Judges (IJs) to uniformly refuse to provide bond hearings to anyone who originally entered the country without inspection.

On March 30, 2026, the District Court within the District of Nevada ruled this interpretation by the government is wrong and entered an order granting partial summary judgment to members of a certified class in *Jacobo Ramirez v. Mullin*, No. 2:25-cv-2136-RFB-MDC, 2026 WL 879799 (D. Nev. Mar. 30, 2026).

Petitioners bring this petition for a writ of habeas corpus to seek enforcement of their rights as members of the class certified in *Jacobo Ramirez*. Petitioners face unlawful detention because Respondents have failed to abide by the declaratory judgment and vacatur issued on behalf of the certified class in *Jacobo Ramirez*. Respondents have failed to consider Petitioners for release from detention on bond and/or conditions by immigration officers and immigration judges.

Accordingly, Petitioners are entitled to relief under the class wide declaratory judgment and vacatur issued in *Jacobo Ramirez* and must be granted immediate release from custody or provided a constitutionally adequate bond hearing.

In addition, even if the government could permissibly interpret 8 U.S.C. §§ 1225 and 1226 to deny Petitioners a bond hearing—though it cannot—holding

them in custody without providing any individualized opportunity to seek release on bond still violates due process requirements.

II. Jurisdiction and Venue

This Court has jurisdiction under 28 U.S.C. § 2241, which grants a federal court the authority to issue a writ of habeas corpus to an individual "in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(c)(3). This Court also has jurisdiction under 28 U.S.C. § 1331 (federal question), and U.S. Const. art. I, § 9, cl. 2 (the Suspension Clause). This Court may grant relief under 28 U.S.C. § 2241; the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq.; and the All Writs Act, 28 U.S.C. § 1651.

Venue is proper in the District of Nevada because Petitioners are detained in this District. Venue is also proper under 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies of the United States, and a substantial part of the events or omissions giving rise to the claims occurred in this district.

III. Parties

Petitioner 1, Jose Nazario Barerra Romero, is an immigration detainee currently detained by U.S. Immigration and Customs Enforcement (ICE) at the Nevada Southern Detention Center (NSDC) in Pahrump, Nevada. He is a member of the Class certified in *Jacobo Ramirez*.

Petitioner 2, Ignacio Aguirre Calixto, is an immigration detainee currently detained by ICE at NSDC in Pahrump, Nevada. He is a member of the Class certified in *Jacobo Ramirez*.

Petitioner 3, Leobardo Gomez Lopez, is an immigration detainee currently detained by ICE at NSDC in Pahrump, Nevada. He is a member of the Class certified in *Jacobo Ramirez*.

Petitioner 4, German Jiminez-Jiminez, is an immigration detainee currently detained by ICE at NSDC in Pahrump, Nevada. He is a member of the Class certified in *Jacobo Ramirez*.

Petitioner 5, Jordin Dandy Rios Vargas, is an immigration detainee currently detained by U.S. Immigration and Customs Enforcement (ICE) at the Nevada Southern Detention Center (NSDC) in Pahrump, Nevada. He is a member of the Class certified in *Jacobo Ramirez*.

Respondent John Mattos is the Warden of NSDC in Pahrump, Nevada. Mr. Mattos, in his official capacity, is the immediate custodian of Petitioners.

Respondent Ruben Leyva is the Acting Field Office Director for the Salt Lake City Field Office of ICE Enforcement and Removal Operations (ERO), which has jurisdiction over civil immigration detainees at detention facilities in Nevada, including NSDC. Mr. Leyva is named in his official capacity and is a legal custodian of Petitioners.

Respondent David J. Venturella is the Acting Director of ICE. Mr. Lyons is named in his official capacity. As the leader of ICE, the agency responsible for detaining and removing noncitizens, he is a legal custodian of Petitioners.

Respondent Markwayne Mullin is the Secretary of the United States Department of Homeland Security (DHS). Mr. Mullin is named in his official capacity. As the Secretary of DHS, Mr. Mullin is responsible for administering immigration laws. *See* 8 U.S.C. § 1103(a). He is a legal custodian of Petitioners.

Respondent Todd Blanche is the Acting Attorney General of the United States and the most senior official in the United States Department of Justice. Mr. Blanche is named in his official capacity. The Acting Attorney General delegates his authority to interpret immigration laws and adjudicate removal cases to the Executive Office of Immigration Review (EOIR), which includes the immigration

courts and the Board of Immigration Appeals. *See* 8 C.F.R. § 1003.0. Mr. Blanche is a legal custodian of Petitioners.

IV. Facts and Legal Framework

On March 30, 2026, the District Court entered an order granting partial summary judgment to members of a certified class in *Jacobo Ramirez v. Mullin*, No. 2:25-cv-2136-RFB-MDC, 2026 WL 879799 (D. Nev. Mar. 30, 2026) ("the *Jacobo Ramirez* Court"). The certified class is defined as:

> All noncitizens in the U.S. without lawful status (1) who are or will be arrested or detained by ICE; (2) who are or will be in removal proceedings before an Immigration Court within the District of Nevada; (3) whom DHS alleges or will allege to have entered the United States without inspection or parole; (4) who are not or will not be subject to detention under 8 U.S.C. §§ 1226(c), 1225(b)(1), or 1231 at the time they are scheduled for or request a bond hearing; and (5) whose most recent arrest by ICE occurred inside the United States and not while arriving in the United States.

Id. at *33.

The *Jacobo Ramirez* Court issued the following declaratory relief:

> Class Members are subject to detention under 8 U.S.C. § 1226(a) and its implementing regulations 8 C.F.R. §§ 236.1, 1236.1 & 1003.19. Class Members are not subject to detention under 8 U.S.C. § 1225(b)(2)(A). Class Members are thus entitled to consideration for release from detention on bond and/or conditions by immigration officers and immigration judges.
>
> Defendants' policies subjecting Class Members to detention under 8 U.S.C. § 1225(b)(2)(A) pursuant to the July 8, 2025 ICE Memo "Interim Guidance Regarding Detention Authority for Applicants for Admission" and *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025) are unlawful under the Immigration and Nationality Act and its implementing regulations.

Id. at *33. The Court also vacated the July 8, 2025 ICE Memo "Interim Guidance Regarding Detention Authority for Applicants for Admission" and *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025) under 5 U.S.C. § 706(2).

The *Jacobo Ramirez* Court then issued a separate order on April 27, 2026, authorizing Class Counsel in *Jacobo Ramirez* "to file joint habeas petitions on behalf of up to fifteen (15) Class Members for the sake of efficiency." *Jacobo Ramirez*, No. 2:25-cv-02136-RFB-MDC, ECF 131 (D. Nev. Apr. 27, 2026) (citing *Dominguez v. Hermosillo*, No. 2:25-CV-02337-TMC, 2025 WL 3537627 (W.D. Wash. Dec. 10, 2025) (adjudicating joint habeas petitions by members of Bond Denial Class seeking relief under Rodriguez v. Bostock, 802 F. Supp. 3d 1297 (W.D. Wash. 2025)).

Petitioners each entered the United States without inspection in the past, their most recent arrest occurred in the interior of the United States and not while arriving at the border; they are in removal proceedings within the District of Nevada; and they are detained by ICE at NSDC in Pahrump, Nevada. Petitioners therefore qualify as class members of *Jacobo Ramirez* and now file a joint habeas petition because their detention without being provided consideration under 8 U.S.C. § 1226(a) is unlawful.

Even if the Court does not order relief under the partial summary judgment issued in *Jacobo Ramirez v. Mullin*, the government's detention of Petitioners without a bond redetermination hearing to determine whether each Petitioner is a flight risk or danger to others violates Petitioner's right to due process.

V. Grounds for Relief:

A. Petitioners must be released or be provided a constitutionally adequate bond hearing because they are members of the *Jacobo Ramirez* certified class, and also are entitled to due process under the Fifth Amendment.

1. Violation of the Immigration and Nationality Act

Petitioners each meet the class membership criteria in *Jacobo Ramirez v. Mullin*, No. 2:25-cv-02136-RFB-MDC, 2026 WL 879799 (D. Nev. Mar. 30, 2026). As members of the class, Petitioners are entitled to consideration for release on bond under 8 U.S.C. § 1226(a). The order granting partial summary judgment in *Jacobo Ramirez* holds that Respondents violate the Immigration and Nationality Act (INA) in applying the mandatory detention statute at 8 U.S.C. § 1225(b)(2) to class members.

Petitioner 1, Jose Nazario Barerra Romero, A-No. 6498, is a citizen of Mexico and a member of the class as he: (a) does not have lawful status in the United States and is currently detained at NSDC after being apprehended by DHS at the Clark County Detention Center in Las Vegas, Nevada on January 11, 2026at the ISAP Office in Orem, Utah on December 4, 2025, *see* Exh. 1 at 2; (b) last entered the United States ion an unknown date at an unknown location and was not apprehended upon arrival, *see* Exh. 1 at 2; and (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231. DHS has placed Petitioner Barerra Romero in removal proceedings under 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Exh. 1 at 3. Mr. Barerra Romero has not received a bond hearing in immigration court. Because Petitioner Barerra Romero is a class member, he is entitled to relief under the class wide declaratory judgment and vacatur issued in *Jacobo Ramirez*.

Petitioner 2, Ignacio Aguirre Calixto, A-No. 0559, is a citizen of Mexico and a member of the class as he: (a) does not have lawful status in the United States and is currently detained at NSDC after being apprehended by DHS at the City of Las Vegas Detention Center in Las Vegas, Nevada on February 24, 2026, *see* Exh. 2 at 2; (b) last entered the United States on an unknown date at an unknown location and was not apprehended upon arrival, *see* Exh. 2 at 2; and (c) is not

detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231. DHS has placed Petitioner Aguirre Calixto in removal proceedings under 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Exh. 2 at 3. Mr. Aguirre Calixto has not received a bond hearing in immigration court. Because Petitioner Aguirre Calixto is a class member, he is entitled to relief under the class wide declaratory judgment and vacatur issued in *Jacobo Ramirez*.

Petitioner 3, Leobardo Gomez Lopez, A-No. 0749, is a citizen of Mexico and a member of the class as he: (a) does not have lawful status in the United States and is currently detained at NSDC after being apprehended by DHS at the Yellow Stone County Detention Facility in Billings, Montana on December 8, 2025, *see* Exh. 3 at 6; (b) last entered the United States in 2007 at an unknown location and was not apprehended upon arrival, *see* Exh. 3 at 6; and (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231. DHS has placed Petitioner Gomez Lopez in removal proceedings under 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Exh. 3 at 1–2. Mr. Gomez Lopez was denied bond on June 5, 2026 in immigration court, but based on information and belief the bond hearing did not comply with due process requirements. Because Petitioner Gomez Lopez is a class member, he is entitled to relief under the class wide declaratory judgment and vacatur issued in *Jacobo Ramirez*.

Petitioner 4, German Jiminez-Jiminez, A-No. 1881, is a citizen of Mexico and a member of the class as he: (a) does not have lawful status in the United States and is currently detained at NSDC after being apprehended by DHS at the Clark County Detention Center in Las Vegas, Nevada on October 21, 2025, *see* Exh. 4 at 6; (b) last entered the United States on an unknown date at an unknown location and was not apprehended upon arrival, *see* Exh. 4 at 6; and (c) is not

detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231. DHS has placed Petitioner Jiminez-Jiminez in removal proceedings under 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Exh. 4 at 1–2. Mr. Jiminez-Jiminez has not received a bond hearing in immigration court. Because Petitioner Jiminez-Jiminez is a class member, he is entitled to relief under the class wide declaratory judgment and vacatur issued in *Jacobo Ramirez.*

Petitioner 5, Jordin Dandy Rios Vargas, A-No. 6774, is a citizen of Peru and a member of the class as he: (a) does not have lawful status in the United States and is currently detained at NSDC after being apprehended by DHS at the ICE Intensive Supervision Appearance Program (ISAP) Office in Orem, Utah on December 4, 2025, *see* Exh. 5 at 2; (b) last entered the United States in December 2023 and was not apprehended upon arrival, *see* Exh. 5 at 2; and (c) is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231. DHS has placed Petitioner Rios Vargas in removal proceedings under 8 U.S.C. § 1229a and charged him as being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United States without inspection. Exh. 5 at 3. Mr. Rios Vargas has not received a bond hearing in immigration court. Because Petitioner Rios Vargas is a class member, he is entitled to relief under the class wide declaratory judgment and vacatur issued in *Jacobo Ramirez.*

Respondents are parties to *Jacobo Ramirez* and bound by the Court's declaratory judgment and vacatur of the unlawful policies. By denying Petitioners a bond hearing under § 1226(a) and asserting that they are subject to mandatory detention under § 1225(b)(2), Respondents violate Petitioners' rights under the INA and this Court's judgment in *Jacobo Ramirez.*

The Court should grant the petition for writ of habeas corpus "forthwith," as the legal issues have been resolved for class members in *Jacobo Ramirez.* Habeas

corpus is "perhaps the most important writ known to the constitutional law . . . affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). "The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and receives prompt action from him within the four corners of the application." *Hoeun Yong v. INS*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted). Petitioners therefore seek release from custody unless Respondents provide an individualized constitutionally adequate bond hearing.

2. Violation of Due Process

Petitioners are also being unlawfully deprived of liberty without a bond hearing, in violation of the Due Process Clause. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects." *Zadvydas v. Davis*, 533 U.S. 678 (2001). "[T]he Due Process Clause applies to all 'persons' within the United States, including aliens, whether their presence is lawful, unlawful, temporary, or permanent." *Id.* at 693; *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206, 212 (1953) ("[A]liens who have once passed through our gates, even illegally, may be expelled only after proceedings conforming to traditional standards of fairness encompassed in due process of law").

Courts in this District hold that Petitioners who are *Jacobo Ramirez* class members detained without being provided a constitutionally adequate bond hearing are being detained in violation of the Due Process Clause. *See, e.g., Martinez v. Mattos,* No. 2:26-cv-00751-RFB-DJA, 2026 WL 1171381, at *2 (D. Nev. Apr. 29, 2026); *see also Escobar Salgado v. Mattos*, 809 F. Supp. 3d 1123, 1158–60 (D. Nev. 2025); *Jacobo Ramirez v. Noem*, 817 F. Supp. 3d 1037, 1053–58 (D. Nev. Nov. 24, 2025).

First, the Petitioners' detention violates procedural due process. To determine if procedural due process is met, this Court applies the three-part balancing test set forth in *Mathews v. Eldridge*, 424 U.S. 319 (1976), by weighing (1) "the private interest that will be affected by the official action"; (2) "the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards"; and (3) "the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement[s] would entail." *Id.* at 335 (citation omitted). *See also Diaz v. Garland*, 53 F.4th 1189, 1203–07 (9th Cir. 2022) (collecting cases and clarifying that the *Mathews* test is appropriate in the context of immigration detention). Applying these factors here to *Jacobo Ramirez* class members such as Petitioners: (1) Respondents are depriving Petitioners of their fundamental liberty interest in being free from incarceration; (2) the risk of an erroneous deprivation of liberty is extraordinarily high where immigration officials have the sole, unguided, and unreviewable discretion to detain Petitioners; and (3) Respondents' interest in enforcing immigration law is served by a proper bond hearing, which petitioners are entitled to under the INA. *See, e.g.,* M*artinez,* 2026 WL 1171381, at *2 (determining Mathews factors applied to similarly situated petitioner and detention without opportunity for bond violates procedural due process); *Escobar Salgado*, 809 F. Supp. 3d at 1162 (same).

Second, detention of Petitioners also violates substantive due process protections. As courts in this District have explained, "government detention violates the substantive component of the due process clause 'unless the detention is ordered . . . in certain special and narrow nonpunitive circumstances, . . . where a special justification . . . outweighs the individual's constitutionally protected interest in avoiding physical restraint.'" *Martinez*, 2026 WL 1171381, at *2 (quoting *Zadvydas*, 533 U.S. at 690)). Here, the immigration documents disclosed by

Respondents for Petitioners do not assert an individualized justification—separate from the Respondents erroneous interpretation of the INA—for detaining Petitioner. Therefore, Petitioners' "prolonged detention, which is poised to last for an untold period of time, violates his [or her] right to substantive due process. *Martinez*, 2026 WL 1171381, at *2 (citing *Escobar Salgado*, 809 F. Supp. 3d. at 1162 (same)).

For a bond hearing to comply with due process, "the typical procedures governing bond hearings are insufficient to safeguard our country's guarantee of due process." *Martinez*, 2026 WL 1171381, at *3. Therefore, Petitioners ask this Court to order Respondents to conduct the individual bond hearing "under § 1226(a), and its implementing regulations, wherein the government must prove, by clear and convincing evidence, that Petitioner's civil detention is justified by an individualized, constitutionally recognized interest—e.g., that his detention is necessary to prevent danger to the community or to ensure his future appearance at removal proceedings." *Id.* (citing *Singh v. Holder*, 638 F.3d 1196, 1203 (9th Cir. 2011) (holding that, "[g]iven the substantial liberty interest at stake[,] ... the government must prove by clear and convincing evidence that [a noncitizen] is a flight risk or a danger to the community to justify denial of bond," where a petitioner was in prolonged immigration detention while the Ninth Circuit reviewed his removal order), *abrogation on statutory grounds recognized by Diaz v. Garland*, 53 F.4th 1189 (9th Cir. 2022); *Martinez v. Clark*, 124 F.4th 775, 785 (9th Cir. 2024) ("[T]he BIA properly noted that the government bore the burden to establish by clear and convincing evidence that [a detained noncitizen] is a danger to the community" in the context of prolonged detention under 8 U.S.C. § 1226(c)).

Accordingly, Petitioners ask this Court to find their detention is unconstitutional because it violates Petitioners' rights to procedural and

substantive due process, and order Respondents to release Petitioners unless they provide an individual, constitutionally adequate bond hearing for each Petitioner.

VI. Requested Relief

Petitioners respectfully request this Court:

1. Assume jurisdiction over this matter.
2. Grant Petitioners' application for a writ of habeas corpus.
3. Order Respondents to not remove Petitioners from this judicial district, absent an order from this Court.
4. Order Respondents to release Petitioners unless they provide an individual bond hearing under 8 U.S.C. § 1226(a) before a neutral arbiter where the Respondents bear the burden of justifying Petitioners' detention by clear and convincing evidence within seven days of this Court's order,
5. Order Respondents to file a notice of compliance with the provisions of any order entered in this case, which must include the immigration court's bond hearing findings and judgment for Petitioners.
6. Order Respondents to return to the Petitioners any personal property, including any personal identification document (other than a passport) and any employment authorization document upon a Petitioners' release.
7. Grant such other and further relief as, in the interests of justice, may be appropriate.

Dated July 22, 2026

Respectfully submitted,

RENE L. VALLADARES
Federal Public Defender

/s/ Sylvia Irvin
SYLVIA IRVIN
Assistant Federal Public Defender

/s/ Wendi Overmyer
WENDI OVERMYER
Assistant Federal Public Defender

/s/Chapman L. Noam
CHAPMAN L. NOAM
Assistant Federal Public Defender
Counsel for Petitioners

Declaration Under Penalty Of Perjury

I declare under penalty of perjury under the laws of the United States of America and the State of Nevada that the facts alleged in this petition are true and correct to the best of counsel's knowledge, information, and belief.

Dated July 22, 2026.

/s/ Sylvia Irvin
SYLVIA IRVIN
Assistant Federal Public Defender

/s/ Wendi Overmyer
WENDI OVERMYER
Assistant Federal Public Defender

/s/ Chapman L. Noam
CHAPMAN L. NOAM
Assistant Federal Public Defender

CERTIFICATE OF SERVICE

I hereby certify that the foregoing Joint Petition for Writ of Habeas Corpus for Class Members of *Jacobo Ramirez v. Mullin, et al.*, No. 2:25-cv-02136-RFB-MDC (D. Nev. Mar. 30, 2026), has been filed on July 22, 2026. I further certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage pre-paid, or have dispatched it to a third-party commercial carrier for delivery within three calendar days, to the following persons:

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