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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Hugo Gil Candido-Bolanos,

Petitioner,

v.

John Mattos, Todd M. Lyons, and Kristi
Noem,

Respondents.

Case No. 2:25-cv-1359-RFB-EJY

**Federal Respondents' Response to
Court's Order dated July 26, 2025, ECF
No. 4**

Federal Respondents respectfully submit this response to the Court's Order dated July 26, 2025 (ECF No. 4), directing Respondents to provide a response addressing the reason for Petitioner's removal. Since receiving notice of the Court's Order yesterday morning, undersigned counsel has diligently engaged in a factual inquiry to meaningfully respond to the Court's requests. Undersigned counsel has conferred with the Department of Homeland Security's Enforcement and Removal Operations (ERO). Despite undersigned counsel's best efforts, some questions remain unresolved, given the short time that has elapsed since the Court issued the Order, and thus undersigned counsel's fact-finding is ongoing. At this time, undersigned counsel has the following preliminary response to the Court's requests.

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I. Response to the Court's Request

Undersigned counsel provides the following preliminary response on behalf of the Federal Respondents:

Mr. Candido-Bolanos was last released from ICE custody on April 22, 2008, under an order of supervision. Due to a change in circumstances, including a reassessment of his removal posture and public safety risk, ICE has determined that continued detention is warranted at this time.

This decision is based on a review of his immigration file and criminal history. Mr. Candido-Bolanos was convicted of racketeer influenced and corrupt organization conspiracy, in violation of 18 U.S.C. § 1962(d), and has a documented history of serious criminal conduct. Accordingly, ICE's decision rests principally on Mr. Candido-Bolanos's significant criminal record, which supports a finding that his continued detention is necessary to ensure public safety and to secure compliance with removal proceedings.

Mr. Candido-Bolanos is currently detained under Section 241(a) of the Immigration and Nationality Act (INA), which governs detention and removal following a final order of removal. Specifically, INA § 241(a)(6) permits continued detention beyond the removal period where the individual is determined to pose a risk to the community or is unlikely to comply with the order of removal. Based on the nature and severity of his prior convictions, continued detention is appropriate under this provision.

As noted in the Federal Defendants' prior submission (ECF No. 6), Mr. Candido-Bolanos has been issued a corrected Notice of Revocation of Release, dated July 26, 2025. Service of the corrected notice is expected to occur on Monday, July 28, 2025.

The Corrected Notice of Revocation of Release advises Mr. Candido of his obligations under 8 U.S.C. § 1253(a), including the requirement that he make good-faith efforts to obtain travel documents and otherwise cooperate with removal efforts. Willful failure to comply may result in criminal penalties. As noted in the Declaration of Tyler Adams filed concurrently herewith, Mr. Candido-Bolanos is not presently scheduled for removal to any third-country.

1 This submission constitutes the Government's preliminary response to the Court's
2 Order. The Government is currently seeking additional information concerning Mr.
3 Candido-Bolanos's custody determinations and will supplement this filing as appropriate.
4 Should the Court require further clarification or documentation in the interim, the
5 Government will endeavor to provide it promptly.

6 Respectfully submitted this 27th day of July, 2025.

7 SIGAL CHATTAH
8 United States Attorney

9 /s/ Summer A. Johnson
10 SUMMER A. JOHNSON
11 Assistant United States Attorney
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