

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

CATALINA SANTIAGO SANTIAGO,

Petitioner,

v.

KRISTI NOEM, et al.;

TABLE OF CONTENTS

I. INTRODUCTION1

II. ARGUMENT1

 A. The Court Has Jurisdiction to Hear This Case1

 B. Ms. Santiago’s Detention Under § 1225(b) Does Not Vitate Her Constitutional
 Due Process Rights3

 C. Ms. Santiago’s Detention Violates Her Substantive Due Process Rights5

 D. Ms. Santiago’s Detention Violates Her Procedural Due Process Rights6</

