

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

JESUS MORALES LOPEZ,)	
)	Case No.: 1:25-cv-3078
Petitioner,)	
)	
vs.)	
)	
JUAN BALTAZAR, Warden of Aurora)	PETITION FOR WRIT OF
Contract Detention Facility;)	HABEAS CORPUS
ROBERT GUADIAN, Field Office Director,)	
Denver Field Office of U.S. Immigration and)	
Customs Enforcement;)	
TODD LYONS, Acting Director of U.S.)	
Immigration and Customs Enforcement;)	
KRISTI NOEM, Secretary of U.S.)	
Department of Homeland Security; and)	
PAMELA BONDI, Attorney General)	
of the United States, in their official capacities,)	
)	
Respondents.)	
)	

INTRODUCTION

1. Petitioner, JESUS MORALES LOPEZ, by and through undersigned counsel, hereby petitions this Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241 based on his unlawful detention by the Department of Homeland Security (DHS).

2. Morales Lopez also files this action for declaratory and injunctive relief, requesting that the Court find that the regulation at 8 C.F.R. § 1003.19(i)(2), the basis for his continued detention, is unconstitutional as 4 other published and 1 unpublished federal court decisions have found. *See Zavala v. Ridge*, 310 F. Supp. 2d 1071, 1076 (N.D. Cal. 2004); *Ashley v. Ridge*, 288 F. Supp. 2d 662 (D.N.J. 2003); *Uritsky v. Ridge*, 286 F. Supp. 2d 842 (E. Mich. 2003); *Bezmen v. Ashcroft*, 245 F. Supp. 2d 446, 450 (D. Conn. 2003); *Mayo Anicasio v. Kramer*, No. 4:25cv3158

(D. Neb. Aug. 14, 2025). Therefore, this Court should order Morales Lopez's immediate release from custody upon the posting of the \$ 7,500 bond already set by the Immigration Judge.

3. Morales Lopez is an alien and longtime resident of Colorado. He has been detained for 3 months at the Aurora Contract Detention Facility—separated from his wife and 4 U.S. Citizen children. Morales Lopez has lived in Colorado almost 20 years and poses no danger to the public.

4. Because of his clean criminal record and strong community ties, an Immigration Judge (IJ) ordered Morales Lopez's release on a \$ 7,500 bond. Attachment 1, Order of the Immigration Judge (Aug. 14, 2025); Attachment 2, Bond Memorandum of the Immigration Judge (Aug. 27, 2025). The IJ determined that Morales Lopez poses no danger to the community and any risk of flight could be ameliorated by the bond. Consistent with the order, Morales Lopez posted bond the next day. Attachment 3, ICE Form I-352 Approval (Aug. 15, 2025).

5. ICE, however, refuses to release Morales Lopez from custody, relying on a federal regulation that gives DHS unilateral authority to block an IJ's custody order. Under that "automatic stay" regulation, 8 C.F.R. § 1003.19(i)(2), if DHS disagrees with an IJ's custody determination, DHS can file a boilerplate notice of intent to appeal that automatically stays the IJ's order. In other words, the prosecuting officials who failed to convince the IJ to keep Morales Lopez detained in the first place can unilaterally block the IJ's order and force continued detention.

6. Morales Lopez now languishes in detention for the duration of the bond appeal, or even longer, despite a valid order mandating his release. As applied to this case, the government's use of the automatic stay regulation is an unconstitutional deprivation of due process and *ultra vires*.

7. Morales Lopez seeks habeas relief under 28 U.S.C. § 2241, which is the proper vehicle for challenging his unlawful detention.

8. He respectfully requests that the Court find his detention unlawful and unconstitutional and issue a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 ordering Respondents to immediately release him from custody. In the alternative, he respectfully requests the Court order Respondents to show cause why this Petition should not be granted within three days.

CUSTODY

9. Morales Lopez is currently in the custody of the Aurora Contract Detention Facility in Aurora, Colorado. He is in the physical custody of Respondents and under the direct control of Respondents and their agents. Morales Lopez has been in ICE custody since July 2, 2025.

JURISDICTION AND VENUE

10. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus) and 28 U.S.C. § 1331 (federal question).

11. Venue is proper in this District under 28 U.S.C. § 1391 and 28 U.S.C. § 2242 because Morales Lopez is confined in this District, at least one Respondent is in this District, Morales Lopez's immediate physical custodian is in this District, and a substantial part of the events giving rise to the claims in this action occurred in this District. *See Trump v. J.G.G.*, 145 S. Ct. 1003, 1005–06 (2025) (per curiam) (“For core habeas petitions, jurisdiction lies in only one district: the district of confinement” (internal quotation marks and citation omitted)).

HABEAS CORPUS

12. A petitioner is entitled to habeas relief if he demonstrates that his detention violates the United States Constitution or federal law. 28 U.S.C. § 2241.

13. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents “forthwith,” unless the petitioner is not entitled to relief. 28

U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return “within *three days* unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.* (emphasis added).

14. The Court has inherent power to release the petitioner pending adjudication of the petition. *See United States v. Hardage*, 58 F.3d 569, 574 (10th Cir. 1995).

PARTIES

A. Petitioner

15. Morales Lopez was detained by Immigration and Customs Enforcement (ICE) officers on July 2, 2025, pursuant to a warrant for his arrest issued in conjunction with a Notice to Appear. He is detained at the Aurora Contract Detention Facility in Aurora, Colorado. He is in the custody and direct control of Respondents and their agents.

B. Respondents

16. Respondent Juan Baltazar is the Warden of the Aurora Contract Detention Facility. Respondent Baltazar has immediate physical custody of Morales Lopez and is sued in his official capacity.

17. Respondent Robert Guardian is the Field Office Director of the U.S. Immigration and Customs Enforcement Denver Field Office. Respondent Guardian has immediate physical custody of Morales Lopez and is sued in his official capacity.

18. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement. Respondent Lyons has immediate physical custody of Morales Lopez and is sued in his official capacity.

19. Respondent Kristi Noem is the Secretary of the U.S. Department of Homeland Security. Respondent Noem is a legal custodian of Morales Lopez and is sued in her official capacity.

20. Respondent Pamela Bondi is the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). Respondent Bondi is a legal custodian of Morales Lopez and is sued in her official capacity.

FACTUAL ALLEGATIONS

A. Background

21. Morales Lopez has been a longtime Colorado resident of almost 20 years. Morales Lopez is married and together with his wife has 4 United States Citizen (USC) children. Morales Lopez has worked very hard through the painting business he owns that is incorporated and registered in the State of Colorado to be the sole financial provider for his children. He and his wife have paid taxes since 2006 demonstrating that he is financially independent.

22. When Morales Lopez last entered the United States in August 2006 he was not encountered by immigration and had no contact with immigration authorities until his arrest on July 2, 2025. With a Warrant for his Arrest, Morales Lopez was also issued a Notice to Appear by DHS charging him as removable pursuant to 8 U.S.C. § 1182(a)(6)(A)(i) as “an alien present in the United States who has not been admitted or paroled.”

23. On August 5, 2025, through counsel, Morales Lopez requested a bond hearing before an IJ. On August 14, 2025, through counsel, Morales Lopez attended his bond hearing, at the conclusion of which, he was granted bond. Despite that Order granting bond, Morales Lopez has remained in custody since August 14, 2025.

B. Detention and Bond Hearing

24. Congress has granted the Attorney General discretion to decide whether to detain or release certain noncitizens pending a removal decision. *See* 8 U.S.C. § 1226(a). The Attorney General has delegated that authority to Immigration Judges. 8 C.F.R. §§ 1003.19, 1236.1.

25. The discretionary detention provision of 8 U.S.C. § 1226(a) applies only to aliens without serious criminal convictions, who, in contrast, are subject to mandatory detention under 8 U.S.C. § 1226(c).

26. Because Morales Lopez has no criminal record, he was arrested and detained under § 1226(a).

27. When an alien is detained under § 1226(a), DHS makes the initial custody determination, but the detainee can request reconsideration by an Immigration Judge. Here, DHS initially detained Morales Lopez without bond. Morales Lopez then requested a bond redetermination hearing in front of an IJ.

28. At the bond hearing on August 14, the IJ heard evidence and argument from Morales Lopez and DHS. For the first time, DHS argued that Morales Lopez was subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A) as an “applicant for admission.”

29. In accordance with decades of practice, the IJ rejected DHS’s novel argument that Morales Lopez is subject to mandatory detention. The IJ also made specific findings of fact that Morales Lopez is not a danger to the community or a substantial flight risk and ordered Morales Lopez to be released on bond. Morales Lopez posted a \$ 7,500 bond the next day.

30. Meanwhile, DHS filed a Form EOIR-42 “Notice of Intent to Appeal the Custody Redetermination,” unilaterally triggering the automatic stay provision at 8 C.F.R. § 1003.19(i)(2). Filing that form blocked the IJ’s order, at least for the pendency of the appeal to the Board of Immigration Appeals (BIA).

31. In other words, DHS—the prosecutor—is not bound by the IJ’s determination. The prosecutor disagreed with the IJ’s decision and unilaterally overrode the order by filing a simple Form EOIR-43.

32. Morales Lopez remains in custody in contravention of the IJ's order. DHS's appeal to the BIA can take months. And as explained more fully below, even resolution of the appeal may not immediately end the automatic stay.

C. Automatic and Discretionary Stay Regulations

33. The relevant regulations provide two distinct mechanisms for staying an IJ's custody order while the government appeals the decision: (1) discretionary stays from the BIA, and (2) automatic stays like the one used here.

34. Under the first mechanism—discretionary stay—DHS files a motion and must persuade the BIA that a stay is warranted. 8 C.F.R. § 1003.19(i)(1). The BIA serves as a neutral adjudicator and weighs the merits of DHS's position. The BIA ultimately makes the decision about whether to grant the stay. DHS could have used that mechanism in this case but did not.

35. Instead, DHS used the second mechanism: the automatic stay. This mechanism involves no neutral adjudicator considering the merits. Rather, it allows the prosecutor—who lost before the IJ—to unilaterally stay the IJ's decision.

36. Regulations provide that DHS's automatic stay will lapse in 90 days absent a BIA decision on the appeal. 8 C.F.R. § 100.36(c)(4). But there are multiple avenues for extension. For example, if the BIA does not issue a decision in the 90-day window, DHS can then seek an additional discretionary stay from the BIA. 8 C.F.R. § 1003.6(c)(5). The automatic stay remains in effect for another 30 days while the BIA decides whether to grant a discretionary stay. *Id.*

37. Likewise, even if the BIA rules in favor of Morales Lopez on appeal and authorizes his release on bond, that release is automatically stayed for five more business days to give DHS a chance to refer the case to the Attorney General. 8 C.F.R. § 1003.6(d). Then, if DHS refers the case to the Attorney General, the automatic stay is extended for another 15 days. *Id.* The Attorney

General may then stay release for the pendency of the case. *Id.* There is no prescribed time limit for final resolution of the custody determination, meaning an individual may remain in detention indefinitely.

38. In sum, Morales Lopez has no way of knowing how long this automatic stay will last and has no opportunity to challenge the stay. In practice, the automatic stay regulation renders the IJ's custody decisions ineffectual: If DHS disagrees with a custody decision, it can keep Morales Lopez detained for a minimum of 90 days, without a truly discernable end point.

39. Meanwhile, Morales Lopez is in custody and his conditions of confinement are indistinguishable from criminal incarceration: He is separated from family, subject to the Aurora Contract Detention Facility's detention rules, and has since required taking blood pressure management medication and anti-anxiety medication.

LEGAL FRAMEWORK

40. The Due Process Clause of the Fifth Amendment guarantees that no person in the United States shall be deprived of liberty without due process. U.S. Const. Amend. V. These substantive and procedural due process protections apply to all people, including noncitizens, regardless of their immigration status. *Trump v. J.G.G.*, 145 S. Ct. 1003, 1006 (2025) (per curiam) (“It is well established that the Fifth Amendment entitles aliens to due process of law’ in the context of removal proceedings.” (quoting *Reno v. Flores*, 507 U.S. 292, 306 (1993))). The automatic stay of Morales Lopez’s release violates his rights to substantive and procedural due process.

41. The automatic stay regulation is also an *ultra vires* regulation that unlawfully grants authority to DHS that Congress has delegated only to the Attorney General.

A. Substantive Due Process

42. Government detention violates the Due Process Clause unless it is ordered in a criminal proceeding with adequate procedural safeguards, or in certain special and non-punitive circumstances “where a special justification, ... outweighs the individual’s constitutionally protected interest in avoiding physical restraint.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

43. In this regard, Respondents have not shown that any “special justification” or compelling government interest exists that outweighs Morales Lopez’s constitutional liberties to justify his continued detention.

44. The automatic stay regulation was originally enacted in October 2001, in an emergency response to the September 11 terrorist attacks and without any opportunity for public comment. The Attorney General articulated several bases for the necessity of the automatic stay provision: (1) a concern that with the passage of time, there would be an increased risk that a dangerous alien may be released; (2) the need to avoid a case-by-case determination of whether a stay should be granted in cases in which DHS had already determined that the alien should be kept without bail or with bail in excess of \$10,000; and, (3) a concern that the time difference between the east and west coast would permit the release of a dangerous alien after the BIA had closed for the day, effectively eliminating the opportunity for an emergency appeal of the immigration judge’s release order. *Executive Office of Immigration Review; Review of Custody Determination*,⁶⁶ Fed.Reg. 54909, 54910 (Oct. 31, 2001).

45. The concern was, therefore, to afford DHS the time necessary to ensure that potentially dangerous alien did not flee. The regulation notes state that the overriding purpose was to protect the public from an alien “that it believes is a threat to national security or the public

safety.” *Executive Office of Immigration Review; Review of Custody Determination*, 66 Fed. Reg. 54909, 54910 (Oct. 31, 2001).

46. However, in Morales Lopez’s case, there had already been a determination by an Immigration Judge that he was not a danger to the public, a threat to national security, or a significant flight risk. The Immigration Judge determined that Morales Lopez has resided in the United States for 19 years without a criminal conviction, and therefore is not a threat to public safety. Morales Lopez is married and has 4 United States citizen (USC) children. He is *prima facie* eligible for Non-LPR Cancellation of Removal and his pending application before the court provides him a strong incentive to appear at future hearings. Morales Lopez has a fixed address he resides at with his family. He has stable employment as the owner of a painting company that is incorporated within the State of Colorado. He is the sole financial provider for his family, and he submitted tax returns dating back to 2006, showing he is financially independent.

47. The enactment of the automatic stay marked a drastic change in practice. Previously, only a discretionary stay from the BIA could stay an IJ’s custody determination. To merit a discretionary stay, Immigration and Nationality Service (DHS’s predecessor) was required to demonstrate to the BIA that it was likely to succeed on the merits *and* would suffer irreparable harm in the interim.

48. In addition to DHS having a less-restrictive option by means of a discretionary stay, the government has no special or compelling justification to continue detaining Morales Lopez, and certainly not an interest that outweighs Morales Lopez’s interest in avoiding continued government detention. *See Zavala v. Ridge*, 310 F. Supp. 2d 1071, 1077 (N.D. Cal. 2004) (“The regulation, which permits unilateral government detention of individuals without a case-by-case determination after a reasoned finding that they do not pose threat to safety or a risk of flight,

violates the Due Process Clause because no special justification exists that outweighs the individual's constitutionally protected interest in avoiding physical restraint."); *Ashley v. Ridge*, 288 F. Supp. 2d 662, 669 (D.N.J. 2003) ("[T]he Government has not shown that any 'special justification' exists which outweighs Petitioner's constitutional liberties so as to justify his continued detention without bail."); *see Dep't of State v. Munoz*, 602 U.S 899, 910 (2024) ("When a fundamental right is at stake, the government can act only by narrowly tailored means that serve a compelling state interest.").

49. The automatic stay regulation which permits unilateral government detention of individuals without a case-by-case determination after a reasoned finding that they do not pose threat to safety or risk of flight, violates the Due Process Clause because no special justification exists that outweighs Morales Lopez's constitutionally protected interest in avoiding restraint. Therefore, the Court must find that Morales Lopez is currently detained in violation of substantive due process.

B. Procedural Due Process

50. Due process also requires an opportunity to be heard at a meaningful time and in a meaningful manner. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). To determine whether government conduct violates procedural due process, the Court weighs three factors: (1) the private interest affected by the government action; (2) the risk that current procedures will cause an erroneous deprivation of the private interest, and the extent to which that risk could be reduced by additional safeguards; and (3) the government's interest in maintaining the current procedures. *Id.* at 335.

Private Interest

51. Morales Lopez's private interest in remaining free from governmental restraint is of the highest constitutional import. The Government cannot demonstrate that Morales Lopez presents an identified and articulable threat to the community to justify his continued detention.

52. Morales Lopez's conditions of detention further tip this factor in his favor. He is separated from his 4 young children who are emotionally, financially, developmentally, and academically dependent on him. Morales Lopez cannot move freely, eat the food that he wants, sleep in his own bed, or spend time with his loved ones. He has very little privacy. He has since started taking blood pressure medication and anxiety medication—he did not take these before his detention.

53. The private interest here is fundamental: freedom from detention. It weighs heavily in the weighing of the *Mathews* factors.

Risk of Erroneous Deprivation

54. In addition, the risk of erroneous deprivation of Morales Lopez's liberty because of the application of the automatic stay provision is substantial. A unilateral determination made by DHS that effectively overruled the reasoned decision of the Immigration Judge poses a serious risk of error.

55. The opportunity to be heard, to present evidence, and to conduct cross-examination was afforded both to DHS and Morales Lopez before the Immigration Judge. The ability of DHS under the automatic stay provision to overturn or nullify the bond determination pending appeal, without having to make a showing and by the mere filing of a notice of appeal, poses a serious risk of error.

56. The automatic stay provision additionally creates potential for error because it conflates the functions of adjudicator and prosecutor. *See Marcello v. Bonds*, 349 U.S. 302, 305-06 (1955) (holding that the special inquiry officer adjudicating over an immigration case cannot also undertake the functions of prosecutor in the same matter).

57. In Morales Lopez's case, the same DHS attorney who lost before the Immigration Judge as a prosecutor, effectively overruled the decision as the adjudicator by invoking the automatic stay. The unilateral procedure creates a risk of erroneous deprivation of Morales Lopez's liberty interest.

Government Interest

58. The government's interest here carries little weight in comparison.

59. The process by which the Immigration Judge renders a bond redetermination accounts for the government's safety and flight concerns.

60. Should DHS disagree with the Immigration Judge, it can seek an emergency stay under 8 C.F.R. § 1003.19(i)(1). The emergency stay provision requires DHS to demonstrate that it is likely to succeed on the merits of its appeal and that it would suffer irreparable harm in the interim. Should it not be able to so demonstrate, the stay of the bond redetermination order would be unjustified.

61. The burden to the government, particularly where it does not necessitate the creation of an additional administrative framework, is minimal.

C. The Automatic Stay Regulation is *Ultra Vires* and Therefore Invalid

62. To the extent the challenged regulation permitting an automatic stay goes beyond the authority of the statutory framework of 8 U.S.C. § 1226(a) by eliminating the discretionary authority of immigration judges to determine whether an individual maybe released, it is invalid.

See Romero v. INS, 39 F.3d 977, 980 (9th Cir. 1994) (holding that immigration regulation that is inconsistent with the statutory scheme is invalid).

63. The plain language of 8 U.S.C. § 1226(a) states that the determination as to whether an individual should be detained during removal proceedings is discretionary. Under subsection (a), Congress has vested the authority in the immigration court to, in the exercise of its discretion, determine whether release may be appropriate. In contrast, under subsection (c), criminal aliens, who have been determined by Congress to pose a substantial risk, are subjected to mandatory detention during their removal proceedings.

64. As a result of the regulation, the discretionary nature of the Immigration Judge's bond determination is eliminated and therefore has the effect of a mandatory detention of a new class of aliens, although Congress has specified that such individuals are not subject to mandatory detention.

65. The automatic stay provision permits the government to impose mandatory detention, contrary to the Immigration Judge's finding. Because this back-ended approach effectively transforms a discretionary decision by the Immigration Judge to a mandatory detention imposed by DHS, it flouts the express intent of Congress and is *ultra vires* to the statute.

FIRST CAUSE OF ACTION

Violation of Fifth Amendment – Substantive Due Process

66. Morales Lopez realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

67. The U.S. Constitution establishes the right to due process for all persons within the United States, including noncitizens, whether their presence here is lawful or unlawful. *See Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

68. The substantive Due Process requirement of the Fifth Amendment prohibits “the government from infringing on certain fundamental rights at all ... unless narrowly tailored to serve a compelling government interest.” *Reno v. Flores*, 507 U.S. 292, 302 (1993). There is no question that freedom from physical restraint is a fundamental liberty interest. *Id.* Because a fundamental right is implicated, the government must prove that the provision at issue is narrowly tailored to meet a compelling governmental interest.

69. The automatic stay provision at 8 C.F.R. § 1003.19(i)(2) is not narrowly tailored to a compelling governmental interest. First, because the Immigration Judge already found that Morales Lopez was not a danger to the community nor such a flight risk that a bond could not guard against it and the regulation permits DHS to override that decision pending its appeal without consideration of the individual facts by any independent arbiter. Second, because if DHS disagrees with the Immigration Judge’s decision, DHS can seek an emergency stay. Thus, continued detention at this point under the regulation violates Morales Lopez’s due process rights.

SECOND CAUSE OF ACTION

Violation of Fifth Amendment – Procedural Due Process

70. Morales Lopez realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

71. Due process requires the opportunity to be heard at a meaningful time and in a meaningful manner.

72. Morales Lopez’s liberty interest and the risk of erroneous deprivation of freedom far outweigh the government’s interest in continued detention. The automatic stay violates Morales Lopez’s procedural due process rights.

THIRD CAUSE OF ACTION

Ultra Vires Regulation

73. Morales Lopez realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

74. Congress gave the Attorney General authority to detain or release aliens pending their removal proceedings, who in turn has delegated that authority to Immigration Judges.

75. The automatic stay regulation at 8 C.F.R. § 1003.19(i)(2) exceeds the authority given to DHS by Congress by giving them unilateral authority to override the IJ's decision, making it unlawful and *ultra vires*.

PRAYER FOR RELIEF

Petitioner Morales Lopez respectfully requests that this Court to grant the following relief:

- (1) Assume jurisdiction over this matter; and
- (2) Order that Morales Lopez's detention by Respondents is contrary to law and unconstitutional; and
- (3) Order that the automatic stay provision of 8 C.F.R. § 1003.19(i)(2) violates due process; and
- (4) Order that the automatic stay provision of 8 C.F.R. § 1003.19(i)(2) is *ultra vires* to 8 U.S.C. § 1226(a); and
- (5) Issue a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and order Respondents to immediately release Petitioner from custody in accordance with the bond order from IJ Gardezelewski, or, in the alternative, order Respondents to show cause why this Petition should not be granted within three days; and
- (6) Award Petitioner reasonable attorneys' fees and costs; and

(7) Grant any further relief the Court deems just and proper.

Dated this 1st day of October 2025.

Respectfully submitted,

/s/ Skylar M. Larson
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ATTORNEY FOR PETITIONER

**VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF PURSUANT
TO 28 U.S.C. § 2242**

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

Dated this 1st day of October 2025.

/s/ Skylar M. Larson _____
Skylar M. Larson, Esq.
Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this **1st day of October 2025**, I served a true and correct copy of the foregoing **Petition for Writ of Habeas Corpus and Attachments 1 through 3** via **U.S. Postal Service Priority Mail Express** upon the following:

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

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vs.)	
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of the United States, in their official capacities,)	
Respondents.)	

ATTACHMENT 1. Order of the Immigration Judge, dated August 14, 2025

ATTACHMENT 2. Bond Memorandum of the Immigration Judge, dated August 27, 2025

ATTACHMENT 3. ICE Form I-352, dated August 15, 2025