

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO  
DENVER DIVISION

_____		)	
HUMBERTO ROMEU-PEREZ,		)	
		)	
<i>Petitioner</i>		)	
v.		)	Case No. 1:25-cv-3307-RMR
		)	
KRISTI NOEM, in her official capacity as		)	
U.S. Secretary of Homeland Security;		)	
PAMELA BONDI in her official capacity		)	
as U.S. Attorney General; <sup>1</sup> WARDEN,		)	
AURORA DETENTION CENTER in		)	
his/her official capacity		)	
		)	
<i>Respondents</i>		)	
_____		)	

**PETITIONER’S RESPONSE TO ORDER TO SHOW CAUSE (ECF No. 13)**

Petitioner Humberto Romeu-Perez (“Mr. Romeu”) hereby responds to the Court’s Order to show cause why “‘Warden Port Isabel Detention Center’ should not be substituted as the respondent to this case and the case be transferred to the United States District Court for the Southern District of Texas.” Order 3, *Romeu Perez v. Warden*, No. 1:25-cv-3307-RMR (Dec. 5, 2025), ECF No. 13. Petitioner concurs with Respondents’ assessment that the Warden of the Port Isabel Detention Center currently

<sup>1</sup> Adding Kristi Noem and Pamela Bondi as Respondents per the Court’s December 11, 2025 Order. See Order 3, *Romeu Perez v. Warden*, No. 1:25-cv-3307-RMR (Dec. 11, 2025), ECF No. 18.

serves as Mr. Romeu's immediate custodian and should be added as a Respondent. See Resp. to Order to Show Cause 1, *Romeu-Perez v. Warden*, No. 1:25-cv-3307 (Dec. 12, 2025), ECF No. 19. Accordingly, and as noted in Mr. Romeu's Memorandum in Support of his Emergency Motion for Temporary Restraining Order, see Memo. 1, fn.1, *Romeu-Perez v. Warden*, No. 1:25-cv-3307 (Dec. 11, 2025), ECF No. 17, he will shortly file an Amended Petition adding the Warden of the Port Isabel Detention Center as a Respondent. Petitioner also agrees with Respondents and Judge Yang that this case should remain in this district as the district of confinement when Mr. Romeu filed his Petition for a Writ of Habeas Corpus on October 20, 2025. See ECF No. 18, at 2-3 (citing *Ex parte Endo*, 323 U.S. 283, 306 (1944)); ECF No. 19, at 4-5. Jurisdiction over this action lies only in the District of Colorado. See *Santillanes v. U.S. Parole Comm'n*, 754 F.2d 887, 888 (10th Cir. 1985) ("It is well established that jurisdiction attaches on the initial filing for habeas corpus relief" and "is not destroyed by a transfer of the petitioner.").

Dated: December 12, 2025

Respectfully submitted,

/s/ Kevin Hirst

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*Counsel for Petitioner*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 12, 2025, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which provided notice to the following email addresses:

Erika A. Kelly  
[Erika.Kelley@usdoj.gov](mailto:Erika.Kelley@usdoj.gov)

*Counsel for Respondents*

*s/ Kevin Hirst*  
KEVIN HIRST