

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

MODOU MBOUP,

Petitioner,

- against -

ALEXANDER CABEZAS, in his official capacity as Acting Assistant Field Office Director for the Newark Field Office for Immigration and Customs Enforcement; KRISTI NOEM, in her official capacity as Secretary of Homeland Security; PAMELA JO BONDI, in her official capacity as Attorney General of the United States of America,

Respondents.

No. 2:25-CV-16882

Hon. Michael E. Farbiarz,
U.S.D.J.

**MEMORANDUM OF LAW IN FURTHER SUPPORT OF
AMENDED PETITION FOR WRIT OF HABEAS CORPUS**

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Pursuant to the Court’s December 12, 2025 text order (ECF No. 22) (the “Text Order”), Petitioner Modou Mboup respectfully submits this memorandum of law in further support of his Amended Petition for Writ of Habeas Corpus (ECF No. 8) (the “Amended Petition” or “Am. Pet.”) and his request for immediate release.¹

INTRODUCTION

The Court’s Text Order directs Petitioner to provide the affirmative legal basis for his arguments that: (i) the lack of an individualized pre-detention assessment violated his due process rights and the Immigration & Nationality Act (“INA”);² (ii) he is entitled to be released from immigration custody because he was detained without an individualized, pre-detention assessment; and (iii) the bond hearing he received did not cure the government’s failure to afford him an individualized pre-detention assessment. As detailed below, the legal basis for each of these arguments flows directly from the Court’s prior determination that Petitioner is detained pursuant to Section 1226 and is supported by a growing body of law from across the country.

¹ Capitalized terms not defined herein shall have the same meaning as in the Amended Petition.

² Consistent with decisions from federal courts around the country, Petitioner’s request for release relies on the Due Process Clause, the INA, and implementing regulations. While the Fourth Amendment may provide similar relief, the Court need not reach that issue here. *See Villegas ex rel. Guzman Andujar v. Francis*, No. 25-CV-09199, 2025 WL 3215597, at *9 (S.D.N.Y. Nov. 18, 2025).

To date, the sole basis that Respondents have proffered for Petitioner’s detention is the government’s mandatory detention authority under Section 1225. However, as this Court correctly held, Respondents’ reliance on Section 1225 is fatally flawed. The only legally cognizable basis for Respondents to detain Petitioner is the government’s discretionary detention authority under Section 1226.

To invoke this discretionary authority, the government must actually exercise some discretion prior to subjecting a non-citizen to detention. That is, a pre-detention assessment must be conducted before detaining a non-citizen under Section 1226. The “purpose of requiring an exercise of discretion *prior to the decision to detain a noncitizen who is not subject to mandatory detention* is to prevent an erroneous deprivation of liberty.” *Lopez Benitez v. Francis*, 795 F. Supp. 3d 475, 495 (S.D.N.Y. 2025) (emphasis added).

Here, it is undisputed that no pre-detention assessment occurred. Rather, Respondents arrested Petitioner while he was the passenger in a car, stopped at a stop light in the vicinity of a raid. Respondents have not offered any individualized reason for his detention. To the contrary, Respondents’ continued insistence that Petitioner’s detention was mandatory underscores the absence of the individualized consideration to which Petitioner was entitled and which Section 1226 presupposes.

Further, the bond hearing that Respondents hastily arranged did not cure the pre-detention violation of Petitioner’s due process rights. Nor could it. The

constitutional violation had already occurred. Moreover, the gamesmanship exemplified by this conduct should not be countenanced. The government should not be allowed to “transform an unlawful detention into a lawful one . . . as doing so would give the Government a free pass to violate a person’s statutory and constitutional rights first and search for authority later.” *Rivas Rodriguez v. Rokosky*, No 25-CV-17419, 2025 WL 3485628, at *3 (D.N.J. Dec. 3, 2025) (O’Hearn, J.) (citations omitted).

Accordingly, and for the reasons more specifically stated herein, Petitioner should be granted immediate release.

ARGUMENT

I. DUE PROCESS REQUIRES AN INDIVIDUALIZED PRE-DETENTION ASSESSMENT BEFORE A NON-CITIZEN CAN BE DETAINED PURSUANT TO SECTION 1226.

The government’s detention of a noncitizen pursuant to Section 1226 is discretionary. The Due Process Clause, coupled with the INA and its implementing regulations, require that the government make a *pre-detention*, individualized assessment *before* exercising this discretionary authority to detain. *Contreras Maldonado v. Cabezas*, No. 25-CV-13004, 2025 WL 2985256, at *5–6 (D.N.J. Oct. 23, 2025) (Semper, J.) (due process rights violated when non-citizen was detained without an “individualized determination *at the time of arrest*”) (emphasis added); *Lopez Benitez*, 795 F. Supp. 3d at 493, 495; *Cuy Comes v. DeLeon*, No. 25-

CV-9283, 2025 WL 3206491, at *5 (S.D.N.Y. Nov. 14, 2025) (acknowledging the government’s obligation to conduct “an exercise of discretion *prior to* the decision to detain a noncitizen who is not subject to mandatory detention”) (emphasis added); *Tumba v. Francis*, No. 25-CV-8110, 2025 WL 3079014, at *7 (S.D.N.Y. Nov. 4, 2025) (“*before* the Government [detains], it must make a discretionary determination” that detention is necessary) (emphasis added and citations omitted). Indeed, “[i]f all noncitizens subject to § 1226(a) could simply be detained on a categorical (or arbitrary) basis without any kind of individualized assessment, it would make little sense to permit such individuals an opportunity to challenge their detention by an appeal before an immigration judge on the basis of specific factors such as dangerousness or flight risk.” *Lopez Benitez*, 795 F. Supp. 3d at 493; *see also Villegas ex rel. Guzman*, 2025 WL 3215597, at *7–9 (“[A] custody re-determination pursuant to 8 C.F.R. § 236.1(d) is an inadequate remedy because there is no initial DHS decision to review.”); *Fangzeng Huang v. Almodovar*, No. 25-CV-9346, 2025 WL 3295912, at *3 (S.D.N.Y. Nov. 26, 2025) (due process violated where petitioner was arrested without “any exercise of discretion at all”); *see also Velesaca v. Decker*, 458 F. Supp. 3d 224, 241 (S.D.N.Y. 2020) (“Defendants do not dispute[] that 8 U.S.C. § 1226(a) and its implementing regulations require ICE officials to make an individualized custody determination.”).

As this Court previously determined, Petitioner is “held under § 1226.” *Mboup v. Field Off. Dir. of New Jersey Immigr. & Customs Enf’t*, No 25-CV-16882, 2025 WL 3062791, at *2 (D.N.J. Nov. 3, 2025). Therefore, consistent with the above, and in accordance with the protections afforded by the Due Process Clause, Petitioner was entitled to a pre-detention assessment. It is undisputed that Respondents never performed that assessment. Rather, they indiscriminately detained Petitioner, and their sole justification for doing so is their misguided assertion that he was subject to Section 1225(b)(2).

II. WHERE A NON-CITIZEN IS DETAINED PURSUANT TO SECTION 1226 WITHOUT A PRE-DETENTION ASSESSMENT, THE APPROPRIATE REMEDY IS IMMEDIATE RELEASE.

Courts (including within this District) have held that, where a non-citizen is detained pursuant to Section 1226 without the requisite pre-detention individualized assessment—including where the government initially justified the detention as mandatory pursuant to Section 1225—the appropriate remedy is immediate release. *See, e.g., Contreras Maldonado*, 2025 WL 2985256, at *5–7; (ordering immediate release where there was no pre-detention individualized assessment); *Lliguicota v. Cabezas*, No. 25-CV-17216, 2025 WL 3496300, at *2 (D.N.J. Dec. 5, 2025) (Semper, J.) (same); *Lopez Benitez*, 795 F. Supp. 3d at 498–99 (same); *Perez Augustin v. Joyce*, No. 25-CV-10122, 2025 WL 3564494, at *2–3 (S.D.N.Y. Dec. 12, 2025) (same).

The reason for this relief is plain: randomly detaining people without conducting a detention analysis *beforehand* amounts to a “game of detention roulette [that] is not consistent with the constitutional guarantee of due process.” *Tumba*, 2025 WL 3079014, at *7.

Further, ordering immediate release is consistent with a broader body of precedent granting the immediate release of non-citizens that were unlawfully detained based on the government’s flawed reinterpretation of its mandatory detention authority under Section 1225. *See, e.g., Bethancourt Soto v. Soto*, No. 25-CV-16200, 2025 WL 2976572, at *8 (D.N.J. Oct. 22, 2025) (O’Hearn, J.); *Rivas Rodriguez*, 2025 WL 3485628, at *3 (O’Hearn, J.); *Rivera Zumba v. Bondi*, No. 25-CV-14626, 2025 WL 2753496, at *10–11 (D.N.J. Sept. 26, 2025) (Hayden, J.); *Vargas Ramos v. Rokosky*, No. 25-CV-15892, 2025 WL 3063588, at *8–9 (D.N.J. Nov. 3, 2025) (Padin, J.); *Lliguicota*, 2025 WL 3496300, at *2; *see also Bermeo Sicha v. Bernal*, No. 25-CV-00418, 2025 WL 2494530, at *7 (D. Me. Aug. 29, 2025), *appeal filed*, No. 25-2062 (1st Cir. Nov. 3, 2025); *E.A. T-B. v. Wamsley*, 795 F. Supp. 3d 1316, 1324 (W.D. Wash. Aug. 19, 2025); *Savane v. Francis*, No. 25-CV-6666, 2025 WL 2774452, at *10 (S.D.N.Y. Sept. 28, 2025); *Munoz Materano v. Arteta*, No. 25-CV-6137, 2025 WL 2630826, at *20 (S.D.N.Y. Sept. 12, 2025); *Morocho v. Jamison*, No. 25-CV-05930, 2025 WL 3296300, at *3 (E.D. Pa. Nov. 26, 2025); *Valdez v. Joyce*, No. 25-CV-4627, 2025 WL 1707737, at *4 (S.D.N.Y.

June 18, 2025); *Kelly v. Almodovar*, No. 25-CV-6448, 2025 WL 2381591, at *3 (S.D.N.Y. Aug. 15, 2025); *Cuy Comes*, 2025 WL 3206491, at *6; *Chipantiza-Sisalema v. Francis*, No. 25-CV-5528, 2025 WL 1927931, at *1 (S.D.N.Y. July 13, 2025); *Rodriguez-Acurio v. Almodovar*, No. 25-CV-6065, 2025 WL 3314420, at *32 (E.D.N.Y. Nov. 28, 2025); *McDonald v. Francis, et al.*, No. 25-CV-09355, 2025 WL 3295906, at *5 (S.D.N.Y. Nov. 26, 2025).

Here, release is all the more appropriate given that Petitioner was *re*-detained after previously being released on his own recognizance by Customs and Border Protection. *See* Reply in Further Support of Petitioner’s Amended Petition for Writ of Habeas Corpus (ECF No. 14) at 6–7; *Khabaza*, 2025 WL 3281514, at *5 (“[C]ourts have consistently held that the Due Process Clause mandates that noncitizens who are released on their own recognizance . . . are entitled to some process before being re-detained.”); *Bethancourt Soto*, 2025 WL 2976572, at *9 (ordering release); *see also Picon v. O’Neill*, No. 25-6731, 2025 WL 3634212, at *5 (E.D. Pa. Dec. 15, 2025) (ordering release where petitioner was re-detained after initial release); *Quispe v. Rose*, No. 25-02276, 2025 WL 3537279, at *7–8 (M.D. Pa. Dec. 10, 2025) (same); *Rodrigues Pereira v. O’Neill*, No. 25-CV-6543, 2025 WL 3516665, at *8 (E.D. Pa. Dec. 8, 2025) (same); *Flores Obando v. Bondi*, No. 25-CV-6474, 2025 WL 3452047, at *2–3 (E.D. Pa. Dec. 1, 2025) (same); *Anirudh v. McShane*, No. 25-CV-6458, 2025 WL 3527528, at *6 (E.D. Pa. Dec. 9, 2025)

(same); *Patel v. O'Neil*, No. 25-CV-2185, 2025 WL 3516865, at *6 (M.D. Pa. Dec. 8, 2025) (same); *Conde v. Jamison*, No. 25-CV-6551, 2025 WL 3499256, at *3 (E.D. Pa. Dec. 5, 2025) (same); *Perez Suspes v. Rose*, No. 25-CV-6608, 2025 WL 3492820, at *3 (E.D. Pa. Dec. 5, 2025) (same); *Patel v. McShane*, No. 25-CV-5975, 2025 WL 3241212, at *3 (E.D. Pa. Nov. 20, 2025) (same); *Ndiaye v. Jamison*, No. 25-CV-6007, 2025 WL 3229307, at *8 (E.D. Pa. Nov. 19, 2025) (same); *Kashranov v. Jamison*, No. 25-CV-05555, 2025 WL 3188399, at *8 (E.D. Pa. Nov. 14, 2025) (same); *Chipantiza-Sisalema*, 2025 WL 1927931, at *1, *3–4 (same); *Rosado v. Figueroa*, No. 25-CV-02157, 2025 WL 2337099, at *13, *19 (D. Ariz. Aug. 11, 2025), *report and recommendation adopted*, 2025 WL 2349133 (D. Ariz. Aug. 13, 2025) (same).

In sum, because Petitioner was (i) not afforded a pre-detention individualized assessment, (ii) improperly detained under Section 1225, and (iii) re-detained without process after initially being released, immediate release is the proper remedy.

III. PETITIONER'S POST-HOC BOND HEARING DOES NOT CURE RESPONDENTS' FAILURE TO CONDUCT A PRE-DETENTION ASSESSMENT.

The “purpose of requiring an exercise of discretion *prior to the decision to detain a noncitizen who is not subject to mandatory detention* is to prevent an erroneous deprivation of liberty.” *Lopez Benitez*, 795 F. Supp. 3d at 495 (emphasis

added). Courts have thus been clear: where a non-citizen is detained under Section 1226, a post-detention bond hearing does nothing to cure the government’s failure to conduct an individualized *pre-detention* assessment. *See, e.g., id.* at 497 (“[G]iven the nature of the constitutional violation [petitioner] sustained here—i.e., Respondents’ failure to conduct any kind of individualized assessment *before* detaining him—any post-deprivation review by an immigration judge would be inadequate.”); *J.U. v. Maldonado*, No. 25-CV-04836, 2025 WL 2772765, at *3 (E.D.N.Y. Sept. 29, 2025) (where “ICE’s detention of Petitioner did not comport with the implementing regulations and § 1226(a) . . . a bond hearing for a post-deprivation review is wholly inadequate to remedy that unlawful detention”).

Indeed, a post-detention bond hearing “is no substitute for the requirement that ICE engage in a deliberative process prior to, or contemporaneous with, the initial decision to strip a person of the freedom that lies at the heart of the Due Process Clause.” *Tumba*, 2025 WL 3079014, at *8 (quoting *Chipantiza-Sisalema*, 2025 WL 1927931, at *3). At that point, the harm has already occurred. As recently explained in *Rodriguez-Arcurio v. Almodovar*:

[Petitioner’s] detention was unlawful from its inception because ICE detained her under the wrong statute and without any notice or opportunity to be heard, much less the procedures required under Section 1226(a). In this situation a post-deprivation bond hearing before a DHS officer or even an immigration judge would provide no genuine opportunity to relief because the detention without adequate pre-deprivation procedures has already

been carried out. . . . The proper remedy for that unlawful detention is release.

2025 WL 3314420, at *31–32.

Consistent with the aforementioned principle, in *Contreras Maldonado v. Cabezas*, Judge Semper ordered immediate release of a petitioner who was detained after her asylum interview without a pre-detention individualized assessment. 2025 WL 2985256, at *6. Even though the petitioner received a post-detention bond hearing, consistent with Section 1226, Judge Semper held that this post-arrest hearing “[did] not rectify the lack of individualized determination *at the time of arrest*” and ordered immediate release. *Id.* at *2–5 (emphasis added).

To hold otherwise would condone—and encourage—continued violations of due process. As Judge O’Hearn astutely observed, the government cannot be allowed to “transform an unlawful detention into a lawful one through alternative, retrospective, post hoc justification presented mid-litigation, as doing so would give the Government a free pass to violate a person’s statutory and constitutional rights first and search for authority later.” *Rivas Rodriguez*, 2025 WL 3485628, at *3 (citations omitted). Further, “[t]he suggestion that government agents may sweep up any person they wish without consideration of dangerousness or flight risk, so long as the person will, at some unknown future date, be allowed to ask some other official for his or her release, offends the ordered system of liberty that is the pillar

of the Fifth Amendment.” *Gonzalez v. Joyce*, No. 25-CV-8250, 2025 WL 2961626, at *5 (S.D.N.Y. Oct. 19, 2025).

As in the foregoing cases, the Court should hold that Petitioner’s post-hoc bond hearing did not cure Respondents’ constitutional violations, and Petitioner is entitled to immediate release.

CONCLUSION

Since the founding of this nation, liberty has been among the most sacrosanct of rights, and the Due Process Clause the most important means of protection. It is the judicial branch’s solemn duty to hold the government to these foundational tenets. In this case, and similar cases, releasing detainees confined without requisite due process strikes the appropriate balance and forces the government to uphold its 250-year-old commitment to ensuring that liberty is not removed without sufficient due process.

For these reasons and the reasons set forth in Petitioner’s prior submissions, Petitioner should be released immediately.

Dated: New York, New York
December 17, 2025

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