

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JUAN JOSÉ PÁRAMO BIESTRA

CASE NUMBER
4:25-cv-05286

v.

PAM BONDI,
in her capacity as
United States Attorney General

IMMIGRATION FILE NO.

KRISTI NOEM,
in her capacity as Secretary of the
U.S. Department of Homeland Security

A 

BRET BRADFORD,
in his capacity as Houston Field
Office Director, Immigration and
Customs Enforcement

RANDALL TATE,
in his capacity as Warden, Montgomery
Processing Center

PETITIONER'S RETORT TO GOVERNMENT'S ANSWER AND MOTION TO
DISMISS

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Juan Páramo, Petitioner, by and through Salvador Colón, his
attorney, and for cause of action would show the Court the following:

This Court issued an Order to Show Cause requiring the Government to
justify holding Mr. Páramo in custody. The Government submitted its answer and
Mr. Páramo responds as follows:

The Government's Opposition and Motion to Dismiss dramatically begins: "Petitioner Juan José Paramo Biestra, a Mexican citizen with two arrest warrants pending in Mexico, is currently detained by Immigration and Customs Enforcement pending a final order of removal." A bold opening indeed, the literary equivalent of a cavalry attack on the infantry. Except that none of it is true. There are no warrants pending in Mexico, and there is no final order of removal.

Mr. Paramo has been involved in extensive litigation against Mexican business interests, the litigation having gone as far as review by the Fifth Circuit Court of Appeals. The documentary record is so convoluted that the Fifth Circuit itself could not determine the nature of the documents alluded to by the Government. At page two of his Bond Memorandum, the Immigration Judge quotes the Fifth Circuit Court of Appeals as describing it this way: "Depending on who tells the story, Defendant-Appellant Juan José Paramo is either an honest Mexican business man caught up in a loan dispute or a fugitive from justice who fled to the United States hoping to evade the consequences of a large-scale fraud he perpetrated in Mexico."

The kicker: one of those "warrants" was withdrawn when Mr. Páramo 

 The dismissal of the "warrant" is attached as Exhibit 1.

The question now is how much Mr. Páramo needs to pay to get the second "warrant" dismissed, and negotiations are on going. These documents are not

warrants, they are legal complaints by creditors, a shake down calculated to generate the most pay for clearing of Mr. Páramo's name.

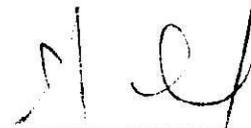
By the time the first complaint was rescinded by Banorte, The Immigration Judge had denied bond and the bond decision is working its laborious way through the appeals system. Briefing was completed on August 20, 2025. Who knows when the Board of Immigration Appeal will finally consider the appeal! In the mean time, Mr. Páramo remains in detention on charges of removability that can not be substantiated.

Mr. Páramo has an asylum application pending. Mr. Paramo's wife has made substantial investment in real estate in the United States, and has applied for Lawful Permanent Residence as an investor. This major investment is of great benefit to the United States. Mr. Paramo is a derivative beneficiary of that application, which is pending. Mr. Paramo also has a fourteen year old U.S. Citizen son that he and his wife care for. Mr. Paramo's continuing detention is causing extreme disruption and hardship to Mr. Paramo and his wife.

Finally, Mr. Páramo is suffering from prostate and bladder cancer. A letter from his doctor is provided as Exhibit 2. It is extremely important, a matter of life or death, for Mr. Páramo to be released to his medical health providers.

For these reasons, Mr. Páramo prays he immediately be released from custody pending resolution of his immigration case.

Respectfully submitted,



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CERTIFICATE OF SERVICE

Undersigned counsel certifies that on December 8, 2025, a true and complete copy of the foregoing was served on opposing counsel via the Court's electronic filing system.



SALVADOR COLON