

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 MEMORANDUM ON JURISDICTION

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Juan Páramo, Petitioner, by and through Salvador Colón, his attorney, and respectfully submits his memorandum regarding the jurisdiction of the Court in this matter.

Mr. Páramo is the victim of a targeted arrest resulting from what ICE characterize as warrants from Mexico. Mr. Páramo was arrested by ICE on May 8, 2025 and has remained in the custody of ICE since that time.

The Government's motion to dismiss argues that the instant action challenges the decision of the Immigration Judge denying bond to Mr. Páramo. Mr. Páramo, however, challenges the legality of the detention itself.

As was stated in Mr. Páramo's petition, 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. ICE arrested Mr. Páramo based on documents it purports to be Mexican arrest warrants, but which in reality appear to be civil summonses. The Mexican government has made no effort to extradite Mr. Paramo, and the documents do provide a reason for the US to hold Mr. Páramo.

These documents provide a pretense for ICE to hold Mr. Páramo, but not a legal justification. Based on those summonses, Mr. Paramo is being detained by ICE and has been refused a bond. While the bond denial is on appeal to the BIA, it appears the BIA is delaying adjudication in contravention of its procedures.

Mr. Páramo applied for asylum, and the asylum application was recently denied by the Immigration Judge. That decision is on appeal to the BIA.

Still pending is an application for adjustment of status to that of a Lawful Permanent Resident. That application can not be acted on until its underlying petition is adjudicated by US Citizenship and Immigration Services. The principal

petitioner is Claudia Magaly Obregón González, Mr. Páramos' wife. The couple has applied for Lawful Permanent Residence based on their substantial investment in the U.S. The petition was filed on April 17, 2023. Ms. Obregón seeks permanent residence for her and her husband as a Regional Center Investment, which requires a minimum investment of between \$800,000 and 1,050,000 in the creation of U.S. jobs.

Once Ms. Obregón's petition is approved, Mr. Páramo can proceed with this application for permanent resident status. Until then, his case remains frozen.

There is no reason for Mr Páramo's continued detention. There has never been a reason for Mr Páramo to be detained. Mr. Páramo is involved in financial disputes with Mexican financial institutions. These disputes do not involve the United States. Mr. Páramo has committed no offense against the United States, has violated no United States laws and has given the U.S. no cause to hold him. The Mexican Government, for its part, has taken no action to take custody of Mr. Páramo.

Mr. Páramo therefore respectfully turns to this court to challenge his continued detention.

Respectfully submitted,

/s/ Salvador Colón

Salvador Colón
Attorney for Plaintiff
PO Box 2951
Houston, Texas 77252
(713)863-7909
scolon@scolon.net

CERTIFICATE OF SERVICE

Undersigned counsel certifies that on December 15, 2025, a true and complete copy of the foregoing was served on opposing counsel via the Court's electronic filing system.

/s/ Salvador Colón

SALVADOR COLON