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8 Attorney for Petitioner, *Douglas Ernesto Ramirez*

9 **UNITED STATES DISTRICT COURT**
10 **SOUTHERN DISTRICT OF CALIFORNIA**

11 Douglas Ernesto RAMIREZ

12 Petitioner,

13 v.

14 KRISTI NOEM, Secretary of
15 Department of Homeland Security;
16 PAMELA BONDI, Attorney General of
17 the United States; TODD LYONS,
18 Acting Director, United States
19 Immigration and Customs Enforcement;
20 GREGORY J. ARCHAMBEAULT,
21 Director, San Diego Field Office, United
22 States Immigration and Customs
23 Enforcement and Removal Operations;
24 CHRISTOPHER J. LAROSE, Warden,
25 Otay Mesa Detention Center;
26 EXECUTIVE OFFICE FOR
27 IMMIGRATION REVIEW,

28 Respondents,

Case No.: '25CV3076 BAS AHG



**PETITION FOR WRIT OF HABEAS
CORPUS, PURSUANT TO 28 U.S.C.
§ 2241; COMPLAINT FOR
DECLARATORY AND
INJUNCTIVE RELIEF UNDER
THE ADMINISTRATIVE
PROCEDURE ACT,
5 U.S.C. §§ 702-706**

1 **PETITION FOR WRIT OF HABEAS CORPUS**

2 Douglas Ernesto Ramirez Petitions this court for a Writ of Habeas Corpus,
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4 pursuant to 28 U.S.C. §2241 and the Administrative Procedure Act, 5 U.S.C.
5 §701, et seq., to remedy his continued unlawful detention by Respondents.
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7 Petitioner requests that he be released during the pendency of this Petition.
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9 In support of this Petition, Petitioner alleged as follows:

10 I.

11 **INTRODUCTION**

- 12 1. Petitioner Douglas Ernesto Ramirez (“Mr. Ramirez”) last entered the United
13 States on or about May 8 2004 without inspection. He has been involved in
14 a long-term relationship with his fiancé, a United States citizen, since 2008.
15 Together he has helped raise her five United States citizen children both
16 financially and emotionally. He has been a member of his community for
17 well over twenty years and worked at the same job for over 15 years. Ex. F.
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19 2. Prior to his detention, Petitioner worked as a car detailer at 
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21  in Artesia, California, to help sustain his fiancé, her children and their
22 household. On or about June 14, 2025, while at work, Petitioner was arrested
23 without a warrant during an ICE raid targeting car washes in Los Angeles
24 County. A combination of approximately 10 marked and unmarked vehicles
25 entered his worksite. He was grabbed by the neck of his shirt by one masked
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1 individual, tackled to the ground, twisting his arm behind him. He heard his
2 shoulder pop as his arm was forcefully being twisted. The officer was
3 assisted by a second officer who pinned Mr. Ramirez down, causing him
4 severe pain as though his shoulder was being dislocated. This caused injury
5 to his shoulder. Without asking him any questions regarding his identity or
6 immigration status, he was taken into custody. Ex. A. Mr. Ramirez has
7 received grossly inadequate medical care in custody.
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11 3. At the time of his arrest, he was physically present within the interior of the
12 United States, where he has resided continuously since 2004. Despite his
13 established presence and residence in the United States, DHS has improperly
14 deemed him to be an “arriving alien” seeking admission to the United States
15 and has subjected him to mandatory detention under 8 U.S.C. §
16 1225(b)(2)(A).
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19 4. On July 8, 2025, the Department of Homeland Security (DHS) issued a
20 nationwide policy directive instructing Immigration and Customs
21 Enforcement (ICE) officers to treat all individuals deemed inadmissible
22 under 8 U.S.C. § 1182(a)(6)(A)(i) — that is, persons present in the United
23 States without admission or parole — as “arriving aliens” who are “seeking
24 admission” to the United States. The policy further directs that such
25 individuals be detained pursuant to 8 U.S.C. § 1225(b)(2)(A), rendering
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1 them ineligible for release on bond during the pendency of removal
2 proceedings. This policy represents a significant departure from long-
3 standing statutory interpretation and practice, which distinguished between
4 individuals apprehended at the border and those arrested in the interior after
5 having established residence in the United States.
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8 5. Following this directive, the Board of Immigration Appeals (“BIA”) issued
9 a precedential decision, *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA
10 2025), holding that immigration judges lack Authority to hear bond requests
11 or to grant bond to aliens...who are present in the United States without
12 admission pursuant to INA §235(b)(2)(A), 8 U.S.C. §1225(b)(2)(A). The
13 Board essentially determined that such persons are subject to mandatory
14 detention under 8 U.S.C. § 1225(b)(2)(A) and therefore must remain
15 detained throughout the pendency of their removal proceedings. This
16 decision has effectively stripped Immigration Judges of their long-
17 recognized authority to assess custody in these cases, resulting in prolonged
18 and unjustified detention of individuals like Mr. Ramirez who has never had
19 an encounter with ICE until now, some 21 years after his entry into the
20 United States.
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22 6. The mandatory detention provision of 8 U.S.C. § 1225(b)(2)(A) does not
23 apply to Mr. Ramirez. Section 1225(b)(2)(A) governs only those individuals
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1 who are applicants for admission encountered at or near the border, not those
2 who have already entered and established residence in the interior. Because
3 Mr. Ramirez entered the United States in May 2004 and was arrested in
4 Artesia, California, well within the United States, he is properly subject to 8
5 U.S.C. § 1226(a) — the statute that governs custody of individuals arrested
6 after entry and permits their release on conditional parole or upon payment
7 of bond.
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11 7. By treating Mr. Ramirez as an arriving alien subject to § 1225(b)(2)(A), he
12 has been unlawfully deprived of his statutory right to a bond redetermination
13 and has been imposed with indefinite detention inconsistent with the
14 Immigration and Nationality Act, constitutional due process, and long-
15 standing circuit precedent distinguishing between detention of those
16 “seeking admission” and those “present in the United States”. Indeed, on
17 July 25, 2025, an Immigration Judge sitting in Otay Mesa, California
18 ordered that he be released on bond payment of \$4500.00. DHS appealed
19 the bond order. On October 7, 2025, after the issuance of *Matter of Yajure*
20 *Hurtado*, 29 I&N Dec. 216 (BIA 2025), the BIA sustained the appeal and
21 vacated the bond order. Thus Mr. Ramirez has remained in custody for
22 almost five months. If habeas is not granted, Mr. Ramirez will suffer
23 irreparable harm.
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1 II.

2 **PARTIES**

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4 8. Petitioner, Douglas Ernesto Ramirez, was detained by immigration
5 authorities on June 14, 2025. He remains in custody at the Otay Mesa
6 Detention Facility in Otay Mesa, California.

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8 9. Respondent, Kristi Noem is the Secretary of Homeland Security. She is
9 responsible for “[c]arrying out the immigration enforcement functions
10 vested by statute in, or performed by, the Commissioner of [the former]
11 Immigration and Naturalization (or any officer, employee, or component of
12 the Immigration and Naturalization Service),” 6 U.S.C. § 202(3), and for
13 “[e]stablishing national immigration enforcement policies and priorities.” 6
14 U.S.C. § 202(5). She is sued in her official capacity.

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18 10. Respondent, Pamela Bondi, is the Attorney General of the United States.
19 She has a mandate, pursuant to 8 U.S.C. §§ 1101(b)(4) and 1103(g)(1)-(2),
20 to supervise the implementation and enforcement of the INA, including the
21 apprehension, detention, and deportation of removable aliens under sections
22 236(a) and 241(a) of the INA, 8 U.S.C. §§ 1226(a) and 1231(a). She is sued
23 in her official capacity.

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26 11. Respondent, Todd Lyons, is the acting director of United States
27 Immigration and Customs Enforcement. He has a mandate, pursuant to 6
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1 U.S.C. §§ 251(2) and 252(a)(3)(A)(ii) and 8 U.S.C. §§ 1103(a)(1) and
2 1103(g)(2), to exercise any functions delegated to him by the Secretary of
3 Homeland Security, including the enforcement of the INA and all other laws,
4 regulations, and policies pertaining to the immigration and naturalization of
5 immigrants, and the apprehension and detention of noncitizens for removal
6 from the United States. He is sued in his official capacity.
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9 12. Respondent, Gregory J. Archambeault, San Diego Field Office Director,
10 United States Immigration and Customs Enforcement and Removal
11 Operations. He has a duty, delegated to him by the Secretary of the United
12 States Department of Homeland Security and the Director of United States
13 Immigration and Customs Enforcement, to supervise the apprehension,
14 detention, and removal of noncitizens within the San Diego, California
15 metropolitan area. He is sued in his official capacity.
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19 13. Respondent, Christopher J. LaRose, Otay Mesa Detention Center warden,
20 the immediate custodian of Petitioner, who bears the responsibility for
21 detaining him pending removal proceedings. He is sued in his official
22 capacity.
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25 14. Respondent, Executive Office for Immigration Review (“EOIR”), is a
26 component agency of the Department of Justice responsible for conducting
27 removal and bond hearings of noncitizens. EOIR is comprised of a lower
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1 adjudicatory body administered by immigration judges and an appellate
2 body known as the Board of Immigration Appeal (“BIA”). Immigration
3 judges issue bond redetermination hearing decisions, which are then subject
4 to appeal to the BIA.
5

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7 III.

8 **JURISDICTION AND VENUE**

9 15. This Court has jurisdiction under 28 U.S.C. §2241 (habeas corpus) and
10 Article I, Section 9, Clause 2, of the United States Constitution (Suspension
11 Clause).
12

13 16. Venue is proper in the Southern District of California because Petitioner is
14 detained in Otay Mesa, California, under color of authority of the United
15 States, in violation of the Constitution, laws or treaties thereof. 28 U.S.C.
16 §1391, 2241.
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19 IV.

20 **LEGAL FRAMEWORK**

21 17. The INA prescribes three basic forms of detention for the vast majority of
22 noncitizens in removal proceedings. First, 8 U.S.C. § 1226 authorizes the
23 detention of noncitizens in standard removal proceedings before an IJ. See
24 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are generally entitled
25 to a bond hearing at the outset of their detention, see 8 C.F.R. §§
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1 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged
2 with, or convicted of certain crimes are subject to mandatory detention, see
3 8 U.S.C. § 1226(c).
4

5 18. Second, the INA provides for mandatory detention of noncitizens subject to
6 expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals
7 seeking admission referred to under § 1225(b)(2).
8

9 19. Last, the INA also provides for detention of noncitizens who have been
10 ordered removed, including individuals in withholding-only proceedings,
11 see 8 U.S.C. § 1231(a)–(b).
12

13 20. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).
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15 21. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part
16 of the Illegal Immigration Reform and Immigrant Responsibility Act
17 (IIRIRA) of 1996, Pub. L. No. 104–208, Div. C, §§ 302–03, 110 Stat. 3009–
18 546, 3009–582 to 3009–583, 3009–585. Section 1226(a) was most recently
19 amended earlier this year by the Laken Riley Act, Pub. L. No.119-1, 139
20 Stat. 3 (2025).
21

22 22. Following the enactment of the IIRIRA, EOIR drafted new regulations
23 explaining that, in general, people who entered the country without
24 inspection were not considered detained under § 1225 and that they were
25 instead detained under § 1226(a). *See* Inspection and Expedited Removal of
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1 Aliens; Detention and Removal of Aliens; Conduct of Removal
2 Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

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4 23. Thus, in the decades that followed, most people who entered without
5 inspection and were placed in standard removal proceedings received bond
6 hearings, unless their criminal history rendered them ineligible. That
7 practice was consistent with many more decades of prior practice, in which
8 noncitizens who were not deemed “arriving” were entitled to a custody
9 hearing before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a) (1994);
10 see also H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a)
11 simply “restates” the detention authority previously found at § 1252(a)).
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15 24. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new policy
16 that rejected well-established understanding of the statutory framework and
17 reversed decades of practice. The new policy, entitled “Interim Guidance
18 Regarding Detention Authority for Applicants for Admission,”¹ claims that
19 all persons who entered the United States without inspection shall now be
20 deemed “applicants for admission” under 8 U.S.C. § 1225, and therefore are
21 subject to mandatory detention provision under § 1225(b)(2)(A). The policy
22 applies regardless of when a person is apprehended, and affects those who
23 have resided in the United States for months, years, and even decades.
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1 25. On September 5, 2025, the BIA published *Matter of Yajure Hurtado*, 29
2 I&N Dec. 216 (BIA 2025), a precedential decision holding that holding that
3 immigration judges lack authority to hear bond requests or to grant bond to
4 aliens...who are present in the United States without admission pursuant to
5 INA §235(b)(2)(A), 8 U.S.C. §1225(b)(2)(A). The BIA essentially
6 determined that such persons who entered without inspection are subject to
7 mandatory detention under 8 U.S.C. § 1225(b)(2)(A).
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11 26. Indeed, this legal theory that noncitizens who entered the United States
12 without admission or parole are ineligible for bond hearings was already
13 rejected by a District Court in the Western District of Washington, finding
14 that such individuals are entitled to bond redetermination hearings before
15 immigration judges, and rejecting the application of § 1225(b)(2) to such
16 cases. *Rodriguez v. Bostock*, No. 3:25-CV-05240- TMC, 2025 WL 1193850,
17 at *12 (W.D. Wash. Apr. 24, 2025).
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21 27. Despite this finding from a federal court, in July 2025, ICE released a
22 memorandum instructing its attorneys to coordinate with the Department of
23 Justice, the agency housing EOIR, to reject bond redetermination hearings
24 for applicants who arrived in the United States without documents.
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26 28. The text of § 1226 also explicitly applies to people charged as being
27 inadmissible, including those who entered without inspection. See 8 U.S.C.
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1 § 1226(c)(1)(E). Subparagraph (E)'s reference to such people makes clear
2 that, by default, such people are afforded a bond hearing under subsection
3 (a).
4

5 29. Section 1226 therefore leaves no doubt that it applies to people who face
6 charges of being inadmissible to the United States, including those who are
7 present without admission or parole.
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9 30. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or
10 who recently entered the United States. The statute's entire framework is
11 premised on inspections at the border of people who are "seeking admission"
12 to the United States. 8 U.S.C. § 1225(b)(2)(A). Indeed, the Supreme Court
13 has explained that this mandatory detention scheme applies "at the Nation's
14 borders and ports of entry, where the Government must determine whether
15 a [noncitizen] seeking to enter the country is admissible." *Jennings v.*
16 *Rodriguez*, 583 U.S. 281, 287 (2018).
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20 31. Accordingly, the mandatory detention provision of § 1225(b)(2) does not
21 apply to people like Petitioner, who have already entered and were residing
22 in the United States at the time they were apprehended.
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1 V.

2 **FACTS**

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4 32. Mr. Ramirez has resided in the United States since on or about May 8, 2004,
5 and lives in Paramount, California, with his United States citizen fiancé. He
6 has helped raise her five United States citizen children. He has maintained
7 stable employment with the same employer for 15 years.
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9 33. On June 14, 2025, Petitioner was arrested without a warrant by ICE/ERO
10 while he was at work as a car detailer at  in Artesia,
11 California during an ICE raid targeting car washes in Los Angeles County.
12 A combination of approximately 10 marked and unmarked vehicles entered
13 his worksite. While he was across the street at a McDonald's located directly
14 adjacent to the carwash, he was intercepted by one of the unmarked vehicles.
15 In intercepting him, the vehicle almost struck his person twice. Ex. A. He
16 was grabbed by the neck of his shirt by one masked individual, tackled to
17 the ground, twisting his arm behind him. He heard his shoulder pop as his
18 arm was forcefully being twisted. The officer was assisted by a second
19 officer who pinned Mr. Ramirez down, causing him severe pain as though
20 his shoulder was being dislocated. This caused injury to his shoulder.
21 Without asking him any questions regarding his identity or immigration
22 status, he was taken into custody. Ex. A.
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1 34. Mr. Ramirez was driven around to multiple locations including a processing
2 center in Santa Ana and ERO San Diego. He was subsequently transferred
3 to Otay Mesa Detention Facility where he remains unlawfully detained.
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5 35. DHS placed Petitioner in removal proceedings before the Otay Mesa
6 immigration court pursuant to 8 U.S.C. § 1229a. ICE has charged Petitioner
7 with, inter alia, being inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) as
8 someone who entered the United States without inspection; and 8 U.S.C. §
9 1182(a)(7)(A)(i), as someone not being in possession of a valid entry
10 documentation.
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12 36. During the entire time, Mr. Ramirez complained of shoulder pain and
13 requested to seek medical attention but his pleas were ignored. In fact, it
14 took three months to receive Naproxen, a pain medication, and an x-ray for
15 the injury sustained to his shoulder on June 14, 2025. The Naproxen caused
16 his stomach to burn and also caused him to have blood in his stool. Mr.
17 Ramirez had warned staff at the Otay Mesa Detention Center of his pre-
18 existing underlying medical conditions affecting his liver, his diagnosis of
19 gastritis and high blood pressure. He also put in multiple requests for
20 medication to treat his chronic medical conditions and has not received
21 grossly inadequate care at best. Ex. A.
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1 37. In addition to the injuries sustained on June 14, 2025, Petitioner has a
2 history of liver disorder secondary to gastric ulcer rupture, high blood
3 pressure, gastritis and vitamin D deficiency. Ex. A. Prior to his detention he
4 was being treated with [REDACTED]

5 [REDACTED]
6 [REDACTED] Since the first day of his detention almost 5 months
7 ago he has put in multiple requests to see a doctor both for the pain resulting
8 from the injuries sustained to his shoulder on June 14, 2025 and for his
9 chronic conditions to obtain medical treatment at the Otay Mesa Detention
10 Facility. He has been denied any semblance of adequate treatment. For the
11 injuries sustained on June 14, 2025, he was given two separate treatments of
12 Naproxen, a nonsteroidal anti-inflammatory drug (NSAID), without regard
13 to the negative impact on his pre-existing high blood pressure, liver disorder
14 and gastritis. This caused his gastritis to flare up causing him to choke on
15 his stomach acid when he sleeps. Ex. A. For his vitamin D deficiency that
16 impacts his liver disorder, he was only allowed to purchase one treatment of
17 vitamin D for 10 days when his numbers were at 11, when the normal range
18 for a male his age is between 40-60. Ex. A. The vitamin D had to be
19 purchased from the commissary and once it ran out he was not allowed to
20 purchase more. Consequently, he is experiencing skin discoloration on his
21 hands, wrists and face. Ex. E. Moreover, Mr. Ramirez he been completely
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1 deprived of [REDACTED] to treat his gastritis or [REDACTED] to treat his high blood
2 pressure for almost five months.
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4 38. Following Petitioner's arrest and transfer to Otay Mesa Detention Center,
5 ICE issued a custody determination to continue his detention without an
6 opportunity to post a bond or seek release on other conditions. Petitioner
7 subsequently requested a bond redetermination hearing before an
8 Immigration Judge. In considering the motion, the Immigration Judge
9 assessed Petitioner's criminal history to determine if Petitioner posed a
10 danger to the community or was a flight risk. *Matter of Guerra*, 24 I&N
11 Dec. 37, 39-40 (BIA 2006); *Matter of Adeniji*, 22 I&N Dec. 1102, 111-1113
12 (BIA 1999).
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16 39. Petitioner does have some criminal history, namely a 2013 misdemeanor
17 petty theft conviction offense under California Penal Code §488; and a 2015
18 misdemeanor failure to appear violation under California Vehicle Code
19 40505(a). Ex. F. The Immigration Judge took all the positive and negative
20 factors into consideration in assessing if Petitioner posed a danger to the
21 community and found that he had been rehabilitated. Further, the court also
22 found that petitioner possessed various positive factors which mitigated any
23 flight risk, namely, strong ties to the community, including his long-term
24 fiancé, and her five children who he raised as his own. In addition, his
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1 membership in the community for over 20 years and his stable employment
2 of 15 years. Ex. F. In sustaining DHS's appeal and vacating the bond order
3 based on a finding of lack of jurisdiction, the BIA did not find it necessary
4 to address those matters. Ex. D. Thus, as a result, Petitioner remains detained
5 since June 14, 2025. Without relief from the Court, he faces the prospect of
6 prolonged detention facing further detriment to his health.
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9 VI.

10 CLAIMS FOR RELIEF

11 COUNT I

12 Violation of the INA

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15 40. Petitioner incorporates by reference the allegations of fact set forth in the
16 preceding paragraphs.
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18 41. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply
19 to all noncitizens residing in the United States who are subject to the grounds
20 of inadmissibility. As relevant here, it does not apply to those who
21 previously entered the country and have been residing in the United States
22 prior to being apprehended and placed in removal proceedings by
23 Respondents. Such noncitizens are detained under § 1226(a), unless they are
24 subject to § 1225(b)(1), § 1226(c), or § 1231.
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1 42. The application of § 1225(b)(2) to Petitioner unlawfully mandates his
2 continued detention and violates the INA.
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4 **COUNT II**

5 **Violation of Due Process**

6 43. Petitioner repeats, re-alleges, and incorporates by reference each and every
7 allegation in the preceding paragraphs as if fully set forth herein.
8

9 44. The government may not deprive a person of life, liberty, or property
10 without due process of law. U.S. Const. amend. V. “Freedom from
11 imprisonment—from government custody, detention, or other forms of
12 physical restraint—lies at the heart of the liberty that the Clause protects.”
13 *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct. 2491, 150 L.Ed.2d 653
14 (2001).
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18 45. Petitioner has a fundamental interest in liberty and being free from official
19 restraint.
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21 46. The government’s detention of Petitioner without a bond redetermination
22 hearing to determine whether he is a flight risk or danger to others violates
23 [his/her/their] right to due process.
24

25 **VII**

26 **PRAYER FOR RELIEF**

27 **WHEREFORE**, Petitioner prays that this Court grant the following relief:
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- 1 1. Assume jurisdiction over this matter;
- 2 2. Issue a writ of habeas corpus requiring that Respondents release Petitioner
3 or provide Petitioner with a bond hearing pursuant to 8 U.S.C. § 1226(a)
4 within 14 days;
- 5 3. Award Petitioner attorney's fees and costs under the Equal Access to Justice
6 Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis
7 justified under law;
- 8 4. Grant any other and further relief that this Court deems just and proper.
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13 Dated: November 10, 2025

Respectfully Submitted,
S/ Mardy M. Sproule

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15 Attorney for Douglas E. Ramirez
16 Email: Mardy.Sproule@att.net
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CERTIFICATE OF SERVICE

I hereby certify that on November 10, 2025, I electronically filed the foregoing Petitioners’ Petition for Writ of Habeas Corpus, and Complaint for Declaratory and Injunctive Relief with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to those attorneys of record registered on the CM/ECF system. All other parties shall be served in accordance with the Federal Rules of Civil Procedure.

Dated: November 10, 2025

Respectfully Submitted,

S/ Mardy M. Sproule

Attorney for Douglas E. Ramirez
Email: Mardy.Sproule@att.net