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Attorney for Petitioner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

Santiago Villaseñor Ponce,	
Petitioner,	Case No. 1:25-cv-00844
v.	District Judge Douglas R. Cole
Sam Saxson, Director of Cincinnati Field Office United States Immigration And Customs Enforcement (ICE) *et al.*	Magistrate Karen L. Litkovitz
Respondents.	

REPLY TO RETURN OF WRIT

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ARGUMENT

I. 8 U.S.C §1252(e)(3) does not bar review of Petitioner's claim.

Respondents claim that §1252(e)(3) deprives this court of jurisdiction. Section 1252(e)(3) limits judicial review of determinations under section 1225(b) and its implementation to the District of Columbia. 8 U.S.C. 1252(e)(3). The respondents further state that any such review is limited to whether an implementing regulation is constitutional or whether a regulation or written policy directive, guideline, or procedure implementing the section violates the law. *See* §1252(e)(3)(A)(i)-(ii); *see also M.M.V v. Garland*, 1 F 4th 1100, 1109 (D.C. Cir 2021).

However, the court does maintain jurisdiction over this habeas claim and to grant a writ of Habeas Corpus to a petitioner who can demonstrate that he is being held in custody in violation of federal law. *See J.A.M v. Jason Streeval 4:25-cv-342 (CDL)* (M.D GA Nov 1, 2025) citing 28 8 USC §2241(a), (c)(3); *see Zadvydas v. Davis*, 533 U.S. 678, 687 (2001). Section 2241 permits the use of habeas corpus proceedings to challenge the lawfulness of immigration related detention. *See Zadvydas v. Davis.*

Furthermore, this court maintains jurisdiction as the petitioner is not challenging the implementation of 1225(b)(2). Rather, the petitioner is asserting that the respondents do not have the statutory authority to detain him under 1225(b)(2) because the statute does not apply to him. The petitioner maintains that 8 U.S.C §1226(a) governs his detention and removal proceedings instead. Numerous district courts have thus found that they maintain jurisdiction over habeas proceedings. *See J.A.M v. Jason Streeval 4:25-cv-342 (CDL)* (M.D GA Nov 1, 2025); *Pizarro*

Reyes v. Immigration and Customs Enforcement, Acting Director of Detroit Field Office, Enforcement and Removal Operations et al, No. 2:2025cv12546 - Document 12 (E.D. Mich. 2025; *Gomes*, 2025 WL 1869299, at *5–6; *Rodriguez*, 779 F. Supp. 3d at 1255–60; *Vasquez Garcia v. Noem*, No. 25-cv-02180 (S.D. Ca. Sept. 3, 2025)5; *Lopez-Campos v. Raycroft*, 2025 WL 2496379; *Martinez v. Hyde*, No. 25-11613, 2025 WL 2084238 (D. Mass. July 24, 2025); *Bautista v. Santacruz*, No. 5:25-cv-01873-SSS-BFM (C.D. Cal. July 28, 2025); *Rosado v. Figueroa et al.*, No. 2:25-cv-02157-DLR, 2025 WL 2337099 (D. Ariz. Aug. 11, 2025); *Lopez Benitez v. Francis et al.*, No. 1:25-cv-05937-DEH, 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Gonzalez et al. v. Noem et al.*, No. 5:25-cv-02054-ODW-BFM (C.D. Cal. Aug. 13, 2025); *Dos Santos v. Noem*, No. 1:25-cv-12052-JEK, 2025 WL 2370988 (D. Mass. Aug. 14, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Romero v. Hyde, et al.*, No. 1:25-cv-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Benitez et al. v. Noem et al.*, No. 5:25-cv-02190-RGK-AS (C.D. Cal. Aug. 26, 2025); *Kostak v. Trump et al.*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025).

II. 8 U.S.C. Section 1252(g) does not bar Petitioner's Habeas Claim.

Section 1252(g) applies to "three discrete actions": commencing removal proceedings, adjudicating removal cases, and executing removal orders. *See J.A.M v. Jason Streeval 4:25-cv-342 (CDL) (*M.D GA Nov 1, 2025) citing *Reno v. Am.- Arab Anti-Discrimination Comm.,* 525 U.S. 471, 482 (1999). The Respondents state that 8 U.S.C. §1252(g) bars the petitioner's claim because petitioner's "detention arises from the decision to commence removal proceedings." However, this petition does not challenge any decision to commence removal proceedings.

Acceptance of respondent's interpretation would bar nearly all detention related challenges brought by noncitizens, which is at odds with the narrow interpretation courts have consistently adopted.

The Supreme Court stated that §1252(g) is "much narrower" than what respondents allege *Reno v. Am.- Arab Anti-Discrimination Comm,* 525 U.S. 471, 482 (1999). Section 1252(g) does not encompass all deportation related cases but rather insulates from litigation immigration authorities "exercise of discretion." *Id* at 478 and 484. This restraint was directed only upon prosecutorial discretion, such as "no deferred action" decisions. *Id* at 485. The court found it "implausible" that the mention of three discrete events along the road to deportation was a way of referring to all claims arising from deportation proceedings. *Id* at 482, *see also Dep't of Homeland Security v. Regents of the Univ. of California*, 591 U.S. 1, 19 (2020) (noting §1252(g) is narrow).

Section 1252(g) thus does not "sweep in claim that can technically be said to 'arise from' the three listed activities," including challenges to the proper interpretation of the INA's detention provisions. *See Jennings v. Rodriguez* 582, U.S. at 294. The Supreme Court has reviewed numerous cases involving the government's application of immigration detention authorities, and it has never held that such claims might be barred by §1252(g) –including in cases concerning §1226. *Id.* 583 U.S. 281 (§ 1226 & 1225); *Zadvydas v. Davis* 533 U.S, 678 (2001) (§1231); *Demore v. Kim* 538 U.S. 510 (2003) (§1226); *Johnson v. Guzman-Chavez*, 594 U.S. 523 (2021) (§§ 1226 & 1231); *Johnsons v. Arteaga-Martinez*, 596 U.S. 573 (2022) (§1231). The Supreme

Court further reiterated in *Jennings that* §1252(g) must be read to refer to just those three specific actions themselves. 583 U.S. at 294.

Here, the petitioner's habeas petition does not challenge any discretionary action to "commence removal proceedings." Rather, this petition challenges the respondent's conclusion that the petitioner is subject to mandatory detention while those proceedings take place. 8 C.F.R. §1003.19(d) (noting IJ considerations of "custody or bond….. shall be separate and apart from and shall form no part of any deportation or removal hearing or proceeding"). Determining the detention provision under which the petitioner is detained is not discretionary, nor does resolving that question challenge the respondent's discretionary decision to place the petitioner in removal proceedings, as her removal proceedings would continue on the non-detained docket, precisely as it had been prior to her detention. Section 1252(g) does not prevent district court jurisdiction over a purely legal question that does not challenge the Attorney General's discretionary authority, even if the answer to the legal question – a description of the relevant law – forms the backdrop against which the Attorney General later will exercise discretionary authority. *See United States v. Hovsepian* 359 F.3d 1144, 1155 (9th Cir. 2004).

III. The Petitioner does not need to exhaust all administrative remedies as it would be futile.

Exhaustion is not a rigid requirement and may not be required in cases where the pursuit of administrative remedies would be a futile gesture. *Shearson v. Holder*, 725 F.3d 588, 594 (6th Cir. 2013) citing *Shawnee Coal Co. v. Andrus*, 661 F.2d 1083, 1093 (6th Cir. 1981). *Shearson* let the courts determine whether exhaustion is required or not in determined cases. *Rodriguez*

Carmona v. Noem, No. 1:25-cv-1131, 2025 WL 2992222, at 2 (W.D. Mich. Oct. 25, 2025). The Sixth Circuit has not mandated that court should impose administrative exhaustion in the context of noncitizen's habeas petitions for unlawful mandatory detention. *Pizarro Reyes v. Immigration and Customs Enforcement, Acting Director of Detroit Field Office, Enforcement and Removal Operations et al*, No. 2:2025cv12546 - Document 12 (E.D. Mich. 2025) at 7. When the legal question is fit for resolution and delay means hardship, a court may choose to decide the issues itself. *Id* at 7 citing *Shalala v. Ill. Council on Long Term Care, Inc.*, 529 U.S. 1, 13 (2000) (citation omitted). A court may also excuse exhaustion if the pursuit of administrative remedy would be a futile gesture. *Id* citing *Shearson* 725 F.3d at 594.

This petition has a legal question that is fit for resolution, namely whether §1226(a) or §1225(b)(2)(A) applied to the petitioner Santiago Villaseñor Ponce. Since this is a matter of statutory interpretation, it historically belongs with the courts. *See Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 385 (2024) (citing *Marbury v. Madison,* 1 Cranch 137, 177, 2 L.Ed. 60 (1803)).

The Petitioner also faces significant hardship if the court refrains from deciding on the issue in favor of advancing the appeal with the BIA. Courts may waive exhaustion requirements when an administrative remedy is subject to an "unreasonable or indefinite time." *Pizarro Reyes v. Immigration and Customs Enforcement, Acting Director of Detroit Field Office, Enforcement and Removal Operations et al*, No. 2:2025cv12546 - Document 12 (E.D. Mich. 2025) citing *McCarthy v. Madigan*, 503 U.S. 140, 147 (1992). Bond denial appeals "typically take six months or more to be resolved at the BIA." *Rodriguez v. Bostock*, 779 F. Supp. 3d 1239, 1245 (W.D.

Wa. 2025). Six months of further, and potentially unnecessary, incarceration is significantly longer than the thirty days the Sixth Circuit rejected as "unreasonable" or "indefinite" in *United States v. Alam*, 960 F.3d 831, 836 (6th Cir. 2020). Plus, the inherent delays with the BIA's administrative process would result in the very harm a bond is designed to ameliorate. *Id.* citing *Hechavarria v. Whitaker*, 358 F. Supp. 3d 227, 237 (W.D.N.Y. 2019) (citation omitted); see also *Gomes v. Hyde*, No. 1:25-cv-11571, 2025 WL 1869299, at *5 (D. Mass. July 7, 2025). Further, Mr. Villaseñor Ponce must prepare for his eventual cancelation of removal hearing and possible appeal while detained, which makes his release even more important. Furthermore, the petitioner has shown that he has severe health issues and further detaining him will only exacerbate those issues. Additionally, with no individual hearing yet scheduled, exhaustion would not effectively afford the petitioner the relief he seeks. *See Lopez-Campos v. Raycraft*, Case No. 2:25-cv-12486, 2025 WL 2496379.

However, if this court decides to use the prudential test, courts within the Sixth Circuit have applied the prudential exhaustion test. *See Lopez-Campos v. Raycraft*, Case No. 2:25-cv-12486, 2025 WL 2496379. Courts require prudential exhaustion when:

(a) Agency expertise makes agency consideration necessary to generate a proper record and reach a proper decision;

(b) Relaxation of the requirement would encourage the deliberate bypass of the administrative scheme; and

(c) Administrative review is likely to allow the agency to correct its own mistakes and to preclude the need for judicial review.

The question of whether a petitioner is entitled to a bond hearing is a legal question of statutory interpretation. *Ballesteros v. Noem*, No. 3:25-cv-594-RGJ, 2025 WL 2880831, at 2 (W.D. Ky. Oct. 9, 2025) see also *Rodriguez Carmona*, No. 1:25-cv-1131 at 3. Especially considering that the question as to whether the Petitioner is entitled to bond hearing would be determined by the interpretation of 8 U.S.C §§ 1225, 1226, and which category covers the Petitioner. *Rodriguez Carmona*, No. 1:25-cv-1131 at 3. Furthermore, in issues of constitutionality, the Sixth Circuit has held that the BIA cannot review due process challenges. *Singh v. Lewis, No. 4:25-cv-96-RGJ, 2025 WL 2699219, at 2 (W.D. Ky. Sep. 22, 2025) citing Sterkaj v. Gonzales, 439 F.3d 273, 279 (6th Cirt. 2006).* The BIA's decision is not necessary to generate a proper record, as their decision will simply be to cite to their previously decided *Matter of Yajure Hurtado*.

Relaxation of the requirement of exhaustion, contrary to respondent's assertions, would not encourage the deliberate bypass of the administrative scheme. The petitioner sought bond first before the immigration court and has only filed this habeas petition after the immigration judge stated she had no jurisdiction to grant bond. Filing an appeal with the BIA, which would take at least six months, would be futile as the BIA has made clear their position in *Matter of Yajure Hurtado*. The BIA is unlikely to correct their own mistake and overrule their own decision issued only a few months ago.

The administrative review will not preclude the judicial review since the Board of Immigration Appeal's decision of *Yajure Hurtado* classifies the petitioner, who entered without inspection, as an admission seeker and so ineligible for bond under 8 U.S.C. § 1225 (b)(2)(A). *Rodriguez*

Carmona, No. 1:25-cv-1131 at 3 citing *Matter of Yajure Hurtado*, 29 I&N, Dec. 216, 229 (BIA 2025).

IV. The petitioner is not subject to 8 U.S.C. §1225(b)(1).

The respondents conceded that the petitioner has never been subject to expedited removal proceedings and is therefore not subject to detention under 8 U.S.C. §1225(b)(1).

V. The petitioner is detained pursuant to 8 U.S.C §1226(a).

Aliens who are arrested pursuant to 1226(a) are entitled to a bond hearing and detention is not mandatory for those individuals. *See J.A.M v. Jason Streeval 4:25-cv-342 (CDL) (*M.D GA Nov 1, 2025). Meanwhile, those detained pursuant to 1225(b)(2) are subject to mandatory detention without a bond hearing. The respondents argument that all aliens who are present without admission in the United States are subject to mandatory detention "overlooks language in §1225(b)(2), it gives little consideration to the overall statutory scheme and completely ignores §1226". *Id.* at 6. Furthermore, the respondent's arguments ignore petitioner's previous release under §1226(a). *See Exhibit 3.*

The issue before this court is one of statutory interpretation and whether §1225(b)(2) or §1226(a) applies to the petitioner. When interpreting a statute, the inquiry begins with the statutory text and ends there if the text is unambiguous. *Pizarro Reyes v. Immigration and Customs Enforcement, Acting Director of Detroit Field Office, Enforcement and Removal Operations et al*, No. 2:2025cv12546 - Document 12 (E.D. Mich. 2025) citing *In re Vill. Apothecary, Inc.*, 45

F.4th 940, 947 (6th Cir. 2022) (quoting *Binno v. Am. Bar Ass'n*, 826 F.3d 338, 346 (6th Cir. 2016)); *see also King v. Burwell*, 576 U.S. 473, 486 (2015). Even if the term is unambiguous, context matters. *Yates v. United States*, 574 U.S. 528, 537 (2015). The term "applicant for admission" is defined in the statue as an alien present in the United States who has not been admitted. §1225(a)(1). However, the statue does not state that all applicants for admission shall be detained. *J.A.M v. Jason Streeval 4:25-cv-342 (CDL) (*M.D GA Nov 1, 2025). Rather, it narrows this mandatory detention to aliens who are "seeking admission." *Id.* The title of §1225 is instructive: "Inspection by immigration officers, expedited removal of inadmissible arriving aliens, referral for hearing." *Pizzaro Reyes* at 13. The use of "arriving" to describe noncitizens strongly indicates that the statute governs the entrance of noncitizens to the United States. *Id.* While §1225 governs removal proceedings for arriving aliens, §1226 serves as a catchall. *Id.* In *Jennings v. Rodriguez*, the Supreme Court explained that §1226(a) is the default rule and applies to aliens already present in the United States. *Id.*

The recent amendment to §1226(a) by Congress also renders the respondent's argument superfluous. *Id. See Gomes, 2025 WL 1869299, at *6–7.* Congress amended §1226 this year via the Laken Riley Act, adding subsection §1226(c)(1)(E), which mandates detention for noncitizens who are inadmissible under §1182(a)(6)(A), §1182(a)(6)(C), or §1182(a)(6)(A) and have been arrested for, charged with, or convicted of certain crimes. §1226(c)(1)(E)(i)-(ii). *Id.* Considering §1182(a)(6)(A)(i) specifically refers to aliens present in the United States without being admitted or paroles, and that §1226(c)(1)(E) requires detention without bond of these individuals if they also committed a felony, the recently created statutory exception would be redundant if §1225(b)(2) mandated their detention as well. *Id* citing *Gomes , 2025 WL 1869299,*

at *7. An alien present in the United States without admittance would be unlikely to prove that they are clearly and beyond a doubt entitled to be admitted, such that ICE would never need to rely on §1226(c)(1)(E) to detain them. *Id citing Mars v. Gen. Rev. Corp., 568 U.S 371, 386 (2013)*. Such an interpretation would largely nullify a statute Congress enacted this year. *Id.*

The respondent's reliance upon *Department of Homeland Security v. Thuraissigiam*, 591 U.S. 103 (2020) to support their argument that someone who entered the US is perpetually seeking admission is also misplaced. *Id* at 16. *Thuraissigiam* held that aliens who arrive at ports of entry, even those paroled elsewhere in the country for years pending removal, are treated as if stopped at the border. *Id.* However, Mr. Villaseñor Ponce did not arrive at a port of entry, and he was never paroled elsewhere.

The respondents reliance upon two BIA precedent decisions, *Matter of Q Li* 29 I&N Dec. 66 (BIA 2025) and *Matter of Yajure Hurtado* 29 I&N Dec. 216 (2025) are also unpersuasive, nor is this court bound by their interpretation. *Pizzaro Reyes* at 16-17 citing *Loper Bright*, 603 U.S. at 413. Furthermore, the facts of *Q Li*, are noticeably different, as the individual in that case had received 212(d)(5) parole, which was then vacated after she was discovered to be wanted for travel document forgery and human smuggling crimes in Spain. *Id* at 16. While the BIA's opinion in *Matter of Yajure Hurtado* reached an opposite decision on the superfluousness of the Laken Riley Act, this court is not obligated to follow their lead. *Id.* Furthermore, the BIA's decision to abandon three decades of consistent statutory interpretation to justify the petitioner's unlawful detention under §1225(b)(2) should be found to be at odds with every district court that has taken up this issue. See *Gomes*, 2025 WL 1869299, at *5–6*; Rodriguez*, 779 F. Supp. 3d at

1255–60; *Vasquez Garcia v. Noem*, No. 25-cv-02180 (S.D. Ca. Sept. 3, 2025)5; *Lopez-Campos v. Raycroft*, 2025 WL 2496379; *Martinez v. Hyde*, No. 25-11613, 2025 WL 2084238 (D. Mass. July 24, 2025); *Bautista v. Santacruz*, No. 5:25-cv-01873-SSS-BFM (C.D. Cal. July 28, 2025); *Rosado v. Figueroa et al.*, No. 2:25-cv-02157-DLR, 2025 WL 2337099 (D. Ariz. Aug. 11, 2025); *Lopez Benitez v. Francis et al.*, No. 1:25-cv-05937-DEH, 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Gonzalez et al. v. Noem et al.*, No. 5:25-cv-02054-ODW-BFM (C.D. Cal. Aug. 13, 2025); *Dos Santos v. Noem*, No. 1:25-cv-12052-JEK, 2025 WL 2370988 (D. Mass. Aug. 14, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Romero v. Hyde, et al.*, No. 1:25-cv-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Benitez et al. v. Noem et al.*, No. 5:25-cv-02190-RGK-AS (C.D. Cal. Aug. 26, 2025); *Kostak v. Trump et al.*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025).

The legislative history of §1226(a) indicates that the statute applies to noncitizens that reside in the United States but previously entered without inspection. *Id* at 20.

> Before IIRIRA passed, the predecessor statute to Section 1226(a)governed deportation proceedings for all noncitizens arrested within the United States.See8 U.S.C. § 1252(a)(1) (1994)("Pending a determination of deportability ... any [noncitizen] ... may, upon warrant of the Attorney General, be arrested and taken into custody."); Hose v. I.N.S., 180 F.3d 992, 994 (9th Cir. 1999)("A deportation hearing was the 'usual means of proceeding against a[ ] [noncitizen] already physically in the United States[.]' "). This predecessor statute, like Section 1226(a), included discretionary release on bond. See§ 1252(a)(1) (1994)("[A]ny such [noncitizen] taken into custody may, in the discretion of the Attorney General ... be continued in custody ... [or] be released under bond[.]"). Upon passing IIRIRA, Congress declared that the new Section 1226(a)"restates the current provisions in [the predecessor statute] regarding the authority of the Attorney General to arrest, detain, and release on bond a[ ] [noncitizen] who is not lawfully in the United States." H.R. Rep. No. 104-469, pt. 1, at 229;see also H.R. Rep. No. 104-828, at 210 (same).

Since §1226(a) adopted the predecessor's authority to release noncitizens unlawfully present in the United States on bond, then Mr. Villaseñor Ponce is entitled to discretionary release on bond as well. *See Id.* Decades of consistent agency practice also support Mr. Villaseñor Ponce's entitlement to a bond/custody redetermination hearing under §1226(a). *Id.* at 21. The government's longstanding practices also can inform the court's determination of what the law is. *Id* citing *Loper Bright*, 603 U.S. at 386. Further, respect for executive branch interpretation of statutes is warranted when the interpretation was issued roughly contemporaneously with the enactment of the statute and has remained consistent over time. *Id.* at 21. When Congress passed the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA), EOIR drafted new regulations that provided: "[a]liens who are present without having been admitted or paroled (formerly referred to as aliens who entered without inspection) will be eligible for bond and bond redetermination." Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed. Reg. 10,312, 10,323 (Mar. 6, 1997). *Id.* For almost three decades, most noncitizens who entered without inspection were placed in standard removal proceedings received bond hearings, unless subject to an exception. *Id* (ECF No. 2, PageID.35). Accordingly, the Respondents' proposed statutory interpretation does not align with the executive branch's contemporaneous guidance when the IIRIRA passed or with the expectations the guidance established. *Id.*

The petitioner, Mr. Villaseñor Ponce was never detained after his entry to the United States on September 25, 1999. The respondents then detained the petitioner on October 14, 2025, over twenty-five years from when he entered the United States. The respondents cannot argue that the

petitioner has been an applicant for admission for over twenty-five years, as it is a singular event that did not take place in 1999 when he entered. Non-citizens who are just present in the United States, like Mr. Villaseñor Ponce, who have been here for years and have not sought any form of relief, are not seeking admission. *Lopez-Campos v. Raycroft*, 2025 WL 2496379 An individual who was apprehended twenty-six years after entry while driving within the United States cannot logically be interpreted as someone seeking admission. *Id* However, when one looks at the plain language of §1226, it states that an alien may be arrested or detained pending a decision on whether an alien is to be removed from the United States, which is clearly applicable to an individual like Mr. Villaseñor Ponce. *Id.* While the attorney general may continue to detain and may release on bond language is discretionary, the statute does provide the petitioner the right to request custody redetermination, which is precisely what he has done.

The overall legislative history, agency guidance, statutory interpretation, and the respondent's own actions show that the petitioner is detained and subject to §1226(a) and is entitled to discretionary bond.

CONCLUSION

The Petitioner has shown that he did not need to exhaust all administrative remedies and that this court retains jurisdiction over these habeas proceedings. Furthermore, the petitioner has shown that he is detained under §1226(a) and thus this court should grant his habeas petition and order respondents to release him as no flight risk or risk to the security of the community was found in his previous bond hearing. Alternatively, this court should order that respondents reinstate the previously granted bond amount of $20,000.

Respectfully submitted,

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