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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

BOLARINWA BOLUWATIFE SALAU[1],	:	**No. 325-CV-02295**
Petitioner	:	
	:	**(MEHALCHICK, J.)**
v.	:	
	:	
ANGELA HOOVER, *et al.*,[2]	:	
Respondents	:	**Filed Electronically**

RESPONSE TO PETITION FOR WRIT OF HABEAS CORPUS

This is a habeas action filed on December 1, 2025, by Petitioner Bolarinwa Boluwatife Salau, an immigration detainee in the custody of the United States Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), at the Clinton County Correctional Facility in McElhattan, Pennsylvania. Doc. 1, Petition for Writ of Habeas Corpus, at 1, 5; *see also* Doc. 7, Supplement to

[1] Petitioner's name was not clearly written on his petition, his correct last name is Salau matching his identification number [redacted]

[2] Although Petitioner named several other government officials, the only proper respondent in this case is Michael Kunes, the Warden of Clinton County Correctional Facility. *See Rumsfeld v. Padilla*, 542 U.S. 426, 435 (2004) ("In habeas challenges to present physical confinement – 'core challenges' – the default rule is that the proper respondent is the warden of the facility where the prisoner is being held."). Petitioner requests release from confinement. *See* Docs. 1, 7, Petition for Writ of Habeas Corpus and Supplement to Petition.

Petition. Specifically, Salau requests that the Court grant his Petition and order his immediate release on his own recognizance or conditional parole. *Id.* at 1, 4. Petitioner also requests that the Court not order a bond redetermination hearing because he will be prejudiced. *Id.* at 4, ¶ 8. In his Supplement to the Petition, Salau requests immediate release and "an expedited hearing and summary order compelling ICE to release me within 7 days of the review of this petition and its conclusion." Doc. 7, Supplement, at 1. He also states that his detention is in violation of Due Process, the Immigration and Nationality Act, and the Administrative Procedure Act. *Id.* Salau also filed a Motion for Temporary Restraining Order (TRO) on December 12, 2025. Doc. 3, Motion for TRO.

On December 18, 2025, this Court entered an order directing Respondent to respond to the Petition on or before December 22, 2025, and it was ordered that Salau was not to be transferred without further order from this Court. Doc. 8, Order to Show Cause, ¶¶ 9-10. The Order was not served, and the Court issued an updated Order on December 22, 2025, ordering Respondents to respond by December 31, 2025, by 5:00 p.m., and Salau is not to be transferred. Doc. 9, Order to Show Cause, ¶¶ 9-10. This Response is filed in accordance with that Order.

FACTUAL BACKGROUND

The Petitioner is a native and citizen of Nigeria who entered the United States on August 2, 2017, as a F-1, non-immigrant Student. Exhibit 1, Record of DHS, at

2. On February 8, 2018, Salau filed an 1-589, Application for Asylum and Withholding of Removal with Citizens and Immigration Services, and this application is pending. *Id.* On June 2, 2018, an I-862, Notice to appear was issued to Salau, charging him with § 237(a)(1)(c)(i) of the Immigration and Nationality Act (INA) for failure to attend classes at the University. *Id.* at 3-4. On December 18, 2023, the Immigration Judge (IJ) dismissed the case due to prosecutorial discretion. *Id.* at 4. Salau filed an I-120, Application to Register Permanent Residence or Adjust Status, on April 4, 2022. *Id.* Salau has no claim to United States citizenship and there are no known naturalization or derivation issues, his mother is a Citizen and National of Nigeria who never resided in the US, and his father is a Citizen and National of Nigeria and never resided in the US, and is deceased. *Id.* The applications were denied on April 12, 2024. *Id.*

On November 13, 2024, Salau was arrested for Identity Theft, in violation of 18 U.S.C. § 1028(a)(7) and 18 U.S.C. § 1028(b)(2)(B). *Id.* at 3; *see also* Indictment, at 12-16, *see also* Pre-Sentencing Report and other related documents at 17-48. He was sentenced in the Northern District of Virginia on September 8, 2025, to a 24 month sentence in the custody of the Federal Bureau of Prisons, and he was credited for time served from November 13, 2024, to September 8, 2025. *Id.* at 5-6. Salau has no other criminal record. *Id.* at 4. His file contains an expired passport, there is

no evidence of gang affiliation or terrorist group, he has not been in the US military, and his release date from BOP custody is November 19, 2025. *Id.*

On October 29, 2025, Salau encountered Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO) Williamsport, pursuant to the Criminal Alien Program. Ex. 1, Record of DHS, at 3. ICE and ERO determined that Salau was an alien removable from the United States, and a Warrant of Arrest was issued. *Id.*

On November 7, 2025, DHS issued of Notice of Custody Determination, and Salau acknowledged receipt and requested review of the custody determination by an immigration judge. Ex. 2, I-286, Notice of Custody Determination.

On November 10, 2025, Salau was served with an I-862, Notice to Appear (NTA), stating that he is not a US citizen, he is a citizen of Nigeria, admitted to the US on August 2, 2017, on F-1 Student Visa to attend Georgia Southern University, but he stopped attending school on September 29, 2017, and was no longer in lawful status. Ex. 3, NTA.

On November 18, 2025, the Immigration Judge found that Salau is a flight risk and relief from removal is not apparent or documented and denied bond. Doc. 1-6.

On November 20, 2025, Salau was served by mail at the Clinton County Correctional Facility, with a I-261, Additional Charges of

Inadmissibility/Deportability. Ex. 4, I-261, Additional Charges of Inadmissibility/Deportability, at 2. The document states that Salau's F-1 Student Visa expired on or about June 7, 2019, his program at Georgia Southern University was scheduled to end on July 31, 2021, but Salau remained in the United States beyond both dates. *Id.* at 1.

On December 9, 2025, the Notice of Hearing was forwarded to Salau at Clinton County Correctional scheduling an in-person hearing for January 6, 2026. Ex. 5, Notice of Hearing.

ARGUMENT

Salau is not entitled to habeas relief. Salau's pre-final mandatory detention has not been arbitrary or prolonged where he has already received a bond hearing. Additionally, the bond hearing Salau received was individualized where the government met its burden to establish that he is a flight risk.

I. Salau's detention under 8 U.S.C. § 1226(c) does not offend due process.

Salau's pre-final order of removal, mandatory detention does not violate the due process clause of the Fifth because it has not been prolonged or arbitrary where he has received a custody redetermination hearing at which the Immigration Judge found that he is a flight risk and relief from removal is not apparent or documented. Doc. 1-6.

The Supreme Court's decision in *Jennings v. Rodriguez*, 583 U.S. ___, 138 S.

Ct. 830 (2018) overruled the Third Circuit's statutorily based decisions in *Diop v. ICE/Homeland Sec.*, 656 F.3d 221 (3d Cir. 2011) and *Chavez-Alvarez v. Warden York County Prison*, 783 F.3d 469, 478 (3d Cir. 2015) that §1226(c) contained a fixed point in an alien's detention necessitating a bond hearing because those decisions fundamentally relied on the doctrine of constitutional avoidance. Instead, the Supreme Court held that the canon could not be applied to 8 U.S.C. § 1226(c), the statute that governs Petitioner's detention. To the extent Salau is able to mount a constitutional challenge to his detention, that claim fails.

In discussing the effect of *Jennings* on mandatory detention, the Third Circuit confirmed the well-settled principle within this district that the statutory holding and explicit time-frames set forth in both *Diop* and *Chavez* have been abrogated; however, a petitioner may still raise an as-applied challenge to the constitutionality of his detention. *See Santos v. Lowe,* 965 F.3d 203, 208 (3d Cir. July 7, 2020) (holding an as-applied constitutional challenge to mandatory detention is allowable even though *Jennings* abrogated the construction of the statute as implicitly limiting detention without a bond hearing, because it left the framework for as-applied constitutional challenges intact). Specifically, where a petitioner challenges the constitutionality of § 1226(c) as applied to him, the Court must apply the constitutional reasoning underlying *Diop* and *Chavez* and in order for Petitioner to show he is entitled to a bond hearing, he must show that the ongoing detention is so

unreasonable or arbitrary that it has actually violated his rights under the Due Process Clause. *See Santos*, 965 F.3d at 210.

In *Jennings*, the Supreme Court specifically held open the question of whether 8 U.S.C. §§ 1225(b), 1226(a), and 1226(c) are constitutional. 138 S. Ct. at 851. With respect to § 1226(c), however, the Supreme Court has already determined that this statute is constitutional on its face. *Demore v. Kim*, 538 U.S. 510, 531 (2003).

A. *Demore* upheld the constitutionality of § 1226(c) as applied to a criminal alien.

In *Demore*, the Supreme Court affirmed the mandatory detention pending removal proceedings of a criminal alien. Similarly, to the extent this Court view's Salau's detention as pursuant to § 1226(c), it is lawful. It is well-established that "detention during deportation proceedings [i]s a constitutionally valid aspect of the deportation process." *Id.* at 523. In every case in which detention incident to removal proceedings has arisen, the Supreme Court has concluded that it is constitutional. *Id.*; *see also Reno v. Flores*, 507 U.S. 292, 306 (1993) ("Congress has the authority to detain aliens suspected of entering the country illegally pending their deportation hearings."); *Carlson v. Landon*, 342 U.S. 524, 538 (1952) ("Detention is necessarily a part of this deportation procedure."); *Wong Wing v. United States*, 163 U.S. 228, 235 (1896) ("We think it clear that detention, or temporary confinement, as part of the means necessary to give effect to the

provisions for the exclusion or expulsion of aliens would be valid."). And in *Demore*, the Court squarely rejected a constitutional challenge to § 1226(c), which mandates detention of certain criminal and terrorist aliens pending removal proceedings, without the opportunity for release on bond. The Court affirmed Congress's categorical judgment, holding that "Congress, justifiably concerned that deportable criminal aliens who are not detained continue to engage in crime and fail to appear for their removal hearings in large numbers, may require that persons such as [the LPR in that case] be detained for the brief period necessary for their removal proceedings." *Demore*, 538 U.S. at 513.

B. The justifications for detaining a criminal alien during his removal proceedings continue for the full duration of those proceedings.

Mandatory detention of a criminal alien under § 1226(c) during removal proceedings is constitutional where it continues to "serve its purported immigration purpose." *Demore*, 538 U.S. at 527 (citing *Zadvydas*, 533 U.S. at 690); *see also Flores*, 507 U.S. at 306; Carlson, 342 U.S. at 540; *Wong Wing*, 163 U.S. at 235-36; *Demore*, 538 U.S. at 532 (Kennedy, J., concurring). As *Demore* itself illustrates, that detention mandate does not cease to be justified whenever the removal proceedings to which the detention is tied exceed a finite time-frame.

First, the government's interest in effectuating removal of a criminal alien if he is ordered removed at the end of the proceedings does not dissipate at any

particular fixed point. It cannot be conclusively established until the end of removal proceedings whether an alien will be ordered removed, because those proceedings are the "sole and exclusive" means for making that determination. 8 U.S.C. § 1229a(a)(3). The prospect of removal, and the government's interest in effectuating it, thus remain concrete throughout.

Furthermore, the risk that a criminal alien will commit further crimes or otherwise present a danger to the community if released will ordinarily remain constant until removal proceedings are completed. Moreover, the government's interest in keeping the alien in custody (and the alien's incentive to abscond) will typically increase over time as removal proceedings progress towards their completion. *See Coello-Udiel v. Doll*, No. 17-1414, 2018 WL 2198720 (M.D. Pa. May 14, 2018) (recognizing that "an alien who has already been ordered removed has less to lose by fleeing while released on bond"). A criminal alien on the cusp of removal has a greater incentive to abscond than one who is at the beginning of his proceedings.

Section 1226(c) also does not cease to be justified when a criminal alien makes choices during the proceedings that necessarily add time to the resolution of his case—and therefore to the detention that Congress found to be a necessary aspect of those proceedings. For example, in *Demore*, the alien's "removal hearing was scheduled to occur" after five months, but the Court noted that "[he] requested and

received a continuance to obtain documents relevant to his withholding application." 538 U.S. at 531 n.15. The Court regarded the additional detention time added by the alien's continuance as fully justified. The Court further noted that, if a criminal alien decided to appeal to the BIA, that typically added about four months to removal proceedings—and thus to the accompanying detention under § 1226(c). *See id.* at 529. But the Court similarly treated the added detention time reasonably consumed in disposing of the appeal as fully justified. "As we have explained before," the Court stated, "'the legal system . . . is replete with situations requiring the making of difficult judgments as to which course to follow,' and, even in the criminal context, there is no constitutional prohibition against requiring parties to make such choices." *Id.* at 530 n.14 (quoting *McGautha v. California*, 402 U.S. 183, 213 (1971)); see *Chaffin v. Stynchcombe*, 412 U.S. 17, 30-31 (1973); *Coello-Udiel*, slip op. at *7.

Justice Kennedy's concurrence in *Demore* reflects a similar understanding. Justice Kennedy joined the majority opinion and further explained that, in his view, an LPR "could be entitled" to a bond hearing "if the continued detention became unreasonable or unjustified." 538 U.S. at 532. But he viewed the constitutionality of continuing detention without a bond hearing as depending on why detention is continuing: if there were an "unreasonable delay *by the [Immigration and Naturalization Service (INS)]* in pursuing and completing deportation proceedings,"

he explained, it "could become necessary" to ask whether "the detention is not to facilitate deportation, or to protect against risk of flight or dangerousness, but to *incarcerate for other reasons*." *Id.* at 532-33 (emphases added). Justice Kennedy could not draw such an inference, however, "from the circumstances of" *Demore* itself. 538 U.S. at 533. The clear implication is that the reasonable continuation of removal proceedings occasioned by an alien's choices—including seeking continuances, relief from removal, or appellate review—does not undermine the constitutionality of detention. So long as the added time is reasonably needed to adjudicate the case (not to prolong pointlessly or to punish), the ongoing detention continues to be constitutionally justified by the interests in "protect[ing] against risk of flight or dangerousness." *Id.* at 532-33.

C. The liberty interests of criminal aliens detained under § 1226(c) are ordinarily substantially diminished.

The criminal grounds on which an alien is subject to mandatory detention are also grounds on which the alien is removable from the United States. *See* 8 U.S.C. § 1226(c)(1). Removability ordinarily will have been established, beyond dispute, by the alien's judgment of conviction. But an alien is entitled to a *Joseph* hearing to seek to establish that the government is substantially unlikely to prevail in demonstrating that his conviction is one that subjects him to mandatory detention. 8 C.F.R. § 1003.19(h)(2)(ii); *Matter of Joseph*, 22 I&N Dec. 799 (B.I.A. 1999). Not

surprisingly, many criminal aliens detained under § 1226(c) concede they are removable. Thus, while such aliens often nonetheless seek relief from removal, in the vast majority of cases "he or she has no right under the basic immigration laws to remain in this country." *Zadvydas*, 533 U.S. at 720 (Kennedy, J., dissenting); *see Demore*, 538 U.S. at 523 n.6 (distinguishing between being "deportable" and seeking relief from removal that may mean the alien will not "ultimately be deported"). Moreover, such requests are often for discretionary relief, such as cancellation of removal, which is "manifestly not a matter of right under any circumstances, but rather is in all cases a matter of grace." *Jay v. Boyd*, 351 U.S. 345, 354 (1956); *see Ins v. Yueh-Shaio Yang*, 519 U.S. 26, 30 (1996) (akin to "a judge's power to suspend the execution of a sentence, or the President's to pardon a convict"). A criminal alien pursuing such discretionary relief notwithstanding that he is removable has greatly diminished due process interests in being released into society while that request is being considered.

The government's interest also becomes stronger (and a criminal alien's liberty interest weaker) when an IJ has ordered him removed. At that point, the government has devoted considerable resources to completing those proceedings; the IJ has concluded that the criminal alien is removable and ordered him removed; and further review will ordinarily leave that order intact. If a criminal alien nonetheless makes the "difficult judgment[]" to appeal to the BIA, he does so

knowing that it will extend his removal proceedings and result in mandatory detention. *Demore*, 538 U.S. at 530 n.14 (citation omitted).

The imbalance becomes even greater if the BIA orders removal. And if the alien files a petition for review in a court of appeals, he need not abandon his claims to be released from immigration detention. Rather than seeking a stay of removal, he can depart or be removed and litigate from abroad. *Nken v. Holder*, 556 U.S. 418, 424 (2009). Thus, a criminal alien has a particularly weak interest in being released into the United States while seeking BIA review of an IJ removal order; weaker still when he files a petition for review and obtains a stay of removal, rather than litigating from abroad; and weaker further still when, at any stage, he does not dispute (or cannot reasonably dispute) that he is removable and thus lacks any substantive right to remain.

D. Salau's detention does not violate due process.

When an alien is detained incident to removal proceedings under 8 U.S.C. § 1226(c), as Salau has been, those proceedings themselves supply extensive safeguards against the arbitrary deprivation of liberty. As of this filing, Salau has been detained for less than two months. He came into ICE custody or about November 7, 2025. During the course of his detention, Salau has availed himself of those procedural safeguards. His next hearing is scheduled for January 6, 2026.

When considering the constitutionality of mandatory detention for aliens

detained under 8 U.S.C. § 1226, courts have upheld periods of detention much longer than Petitioner's. *See Coello-Udiel*, 2018 WL 2198720, at *3 (holding 15 months of detention does not violate due process where the case has proceeded at a reasonable pace with no evidence the government has willfully delayed the case and "[w]hile Coello-Udiel certainly has the right to pursue all available avenues to combat his removal, post-*Jennings*, he does not have the right to parlay the resulting delay into a bond hearing"); *Vukosavljevic v. Lowe*, Civil No. 18-1235, 2018 WL 6706691 (Munley, J.) (prolonged mandatory detention will amount to unconstitutional application of 1226(c) only when "so unreasonable that it amounts to an arbitrary deprivation of liberty which cannot comport" with Due Process; however, alien's mandatory detention for 15 months where the case has progressed at a reasonable pace with no indication the government has improperly or unreasonably delayed the case is not arbitrary application of statute); *Ohaimhirgin v. Lowe*, Civil No. 18-1934, 2018 WL 6650270 (MD PA Dec. 19, 2018) (Jones, J.) (holding alien's mandatory detention for 9 months where most of delays are attributable to alien's counsel is not arbitrary application of statute); *Crooks v. Lowe*, Civil No. 18-0047, 2018 WL 6649945 (MD PA Dec. 18, 2018) (Jones, J.) (18 months mandatory detention not arbitrary); *Rosales v. Lowe*, Civil No. 18-1302, 2018 WL 6650304 (MD PA Dec. 18, 2018) (Jones, J.) (15 months mandatory detention not arbitrary).

Here, Salau's case is not the type of extraordinary case that warrants a

constitutional remedy. Salau's detention continues to fulfill the purpose of facilitating deportation and protecting against flight or dangerousness. ICE is lawfully detaining Salau for removal proceedings because his criminal record places him with the ambit of § 1226(c). *Jennings*, 138 S. Ct. at 847. In *Santos*, the Court set forth a "non-exhaustive" list of four factors for a court to consider in assessing the constitutionality of continued mandatory detention. *See Santos*, 965 F.3d at 211. Those factors include the duration of detention, the likelihood of continued detention, reasons for the delay in the administrative proceedings, and the conditions of confinement. *Santos*, 965-F.3d at 211-212. To the extent that Salau makes a direct challenge to the constitutionality of his detention, his claims are unavailing. Salau's detention does not violate due process. Additionally, Salau has received a bond hearing where the government met its burden to establish that he is a flight risk. Salau did not appeal to the BIA.

1. The total length of detention to date.

Salau has been detained for approximately 2 months pursuant to 8 U.S.C. § 1226(c) under pre-final, mandatory detention. Salau's detention, however, is directly tied to the adjudication of his removal proceedings and claims for relief from removal. Salau has received, and likely will continue to receive, detailed and thorough consideration of his challenges to his detention and removal by the IJ and other administrative or judicial bodies. Since he has been detained, he has received

a bond hearing and has a additional hearings scheduled regarding his removal.

Moreover, the Court must examine two very important related factors the basic questions of "the reason for prolonged detention" and "whether the detained alien has asserted defenses to removal." *Misquitta v. Warden Pine Prairie ICE Processing Ctr.*, 353 F. Supp. 3d 518, 525 n.4 (W.D. La. 2018) (citing post-*Jennings* cases that consider one or both of these issues). To understand the relevant facts and circumstances, these factors must be considered in connection with the overall length of detention to appreciate *why* an alien has been detained as long as he has. Here, Salau's heavily litigated removal proceedings should be taken into account as part of the length-of-detention analysis.

As the Supreme Court stated in *Demore*, when considering the added detention time incident to the detainee's appeal, "The legal system . . . is replete with situations requiring the making of difficult judgments as to which course to follow, and, even in the criminal context, there is no constitutional prohibition against requiring parties to make such choices." 538 U.S. at 530 n.14 (alteration in original). Indeed, "[a]lthough this litigation strategy is perfectly permissible," courts have held an alien "may not rely on the extra time resulting therefrom to claim that his prolonged detention violates substantive due process." *Doherty v. Thornburgh*, 943 F.2d 204, 211 (2d Cir. 1991); *see also Thevarajah v. McElroy*, No. 01-CV-0039, 2002 WL 923914, at *5 (E.D.N.Y. April 30, 2002) ("It is entirely understandable

why Thevarajah chose the course of action he did [contributing to nearly 5 years in immigration custody]. This Circuit does not, however, permit an alien to rely on the lengthening of detention caused by his litigation strategy to claim that his prolonged detention violates substantive due process." Accordingly, the Court should consider the reasons for the length of detention rather than simply totaling the months that Petitioner has been detained. Finally, Salau has been detained for less than 2 months. In cases where the Court found the length of detention excessive, those petitioners had been detained in excess of thirty months without a bond hearing. *See Santos*, 965 F.3d at 212; *Diop*, 656 F.3d at 226, 235.

2. The likely duration of future detention.

Although considered by this Court in almost every habeas petition challenging 1226(c) detention post *Jennings,* this factor relies on unhelpful hypothesizing of future events, and improperly requires litigants to argue to this Court the merits of their position at the administrative level. Even so, this factor weighs in favor of the Respondent, as Salau's removal proceedings are pending and a hearing is scheduled for the near future. All indications are that his proceedings can be resolved in a relatively short period of time, with a decision anticipated in months, not years.

3. Delays in the removal proceedings caused by the detainee or the government.

The government has not intentionally delayed or unreasonably prolonged

Salau's proceedings. Conversely, Salau's proceedings have moved forward at the normal rate, without delay on behalf of the government. As a result, each of these factors weigh in favor of the Respondent.

4. Conditions of Confinement.

Salau's conditions of confinement are not punitive. In *German Santos*, the Third Circuit found that a weighing of the factors required grant of a bond hearing for a petitioner who had been detained for over two and a half years without an end in sight. 965 F.3d at 212-13. In this matter, Salau's administrative hearings have progressed in a timely manner and he has been detained for less than two months.

CONCLUSION

Because the length and duration of Salau's detention has already been addressed in that he received an individualized bond hearing where the government met its burden to establish that he poses a flight risk, and his continued detention is lawful, Respondent respectfully requests the Court deny Petitioner's Petition for Writ of Habeas Corpus.

Respectfully submitted,

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Date: December 31, 2025

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

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Respondents	:	**Filed Electronically**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that she is an employee of the Office of the United States Attorney for the Middle District of Pennsylvania and is a person of such age and discretion as to be competent to serve papers. That on December 31, 2025, she served a copy of the attached

RESPONSE TO PETITION FOR WRIT OF HABEAS CORPUS

by placing said copy in a postpaid envelope addressed to the person hereinafter named, at the place and address stated below, which is the last known address, and by depositing said envelope and contents in the United States Mail at Scranton, Pennsylvania.

Addressee:
Bolarinwa Boluwatife Salau
[redacted]
Clinton County Correctional Facility
58 Pine Mounttain Road
McElhattan, PA 17748

/s/ Maureen Yeager
Maureen Yeager
Paralegal Specialist