UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

WILMER GARCIA GUERRERO,
Petitioner,

v.

DALE J. SCHMIDT,
Respondent.

Case No. 25-cv-1975

PETITIONER'S RESPONSE FOR WRIT OF HABEAS CORPUS

Petitioner Wilmer Garcia Guerrero, a citizen of Venezuela and Colombia, has resided in the United States for four years. As his Temporary Legal Status ("TPS") lapsed, the Milwaukee-ICE office arrested Petitioner during a scheduled check-in. Petitioner's detention is unlawful because DHS and EOIR have applied mandatory detention to Petitioner, contrary to the plain text of the INA, DHS's arrest decision, congressional intent, and prior agency action. All contemplate release on bond as legal possibility for Petitioner, as does due process. The *Bautista* Court further certified a class–of which Petitioner claims membership–clarifying he is not subject to mandatory detention. However, Petitioner now remains in Respondent's custody without being afforded an individualized bond hearing.

BACKGROUND

I. Factual Background

Although the parties agree on facts outlined in the Answer (ECF No. 7 at 3), additional facts are relevant to the Court's analysis in this case.

Petitioner has not yet filed any applications for relief with the Chicago Immigration Court, however he has an application pending with USCIS[1] and intends to seek asylum with the Court. In the meantime, Petitioner agrees his TPS protections lapsed on October 3, 2025 and he has not been admitted. *Noem, Sec., DHS et al. v. Nat. TPS Alliance, et al.*, 606 U.S. ___ (October 3, 2025); *Sanchez v. Mayorkas*, 593 U.S. __ (2021).

On December 11, 2025, Petitioner requested bond before the Immigration Court, which was denied. (ECF No. 1-8.) On December 18, 2025, a final declaratory judgment issued in *Bautista v. Santacruz*, No. 5:25-cv-01873, 2025 WL 3713987 at *32 (C.D. Cal. Dec. 18, 2025), *appeal docketed* Dec. 19, 2025 No. 25-7958, concluding, inter alia, that all Bond Eligible Class members are detained under 8 U.S.C. § 1226(a) and are not subject to mandatory detention under § 1225(b)(2), and are entitled to consideration for release on bond by immigration officers. On December 19, Petitioner filed a Motion for Custody Redetermination with EOIR, citing the December 18 *Bautista* decision. As the motion was scheduled for January 7, 2026, Petitioner remains in custody.

[1] Petitioner received TPS, a designation that protected him from deportation due to the severe humanitarian crisis, political instability, and lack of safety in Venezuela. (ECF No. 1-4.) This protection was valid from May 31, 2024 to October 3, 2025. (*Id.*) *See Noem, Sec., DHS et al. v. Nat. TPS Alliance, et al.*, 606 U.S. ___ (October 3, 2025.) Although on April 4, 2025 Petitioner filed to renew with USCIS, that application has not been decided and remains pending, probably due to litigation regarding the validity of the extension. (ECF No. 1-5.) *See e.g. Noem, Sec., DHS et al. v. Nat. TPS Alliance, et al.*, 606 U.S. ___ (October 3, 2025).

II. Legal Background

This case involves two sections of the Immigration and Nationality Act ("INA") that relate to the detention of noncitizens, 8 U.S.C. § 1225 and 8 U.S.C. § 1226. 8 U.S.C. § 1225 governs "Inspection by immigration officers; expedited removal of inadmissible arriving aliens; referral for hearing," whereas 8 U.S.C. § 1226 governs "Apprehension and detention of aliens."

a. Inspection by Immigration Officers; Expedited Removal of Inadmissible Arriving Aliens; Referral for Hearing.

The parties disagree on whether 8 U.S.C. § 1225 alone governs detention and removal procedures for "applicants for admission." (ECF No. 7 at 4-5.) Section 1225 generally applies "at the Nation's borders and ports of entry, where the Government must determine whether an alien seeking to enter the country is admissible." *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018). Noncitizens covered by § 1225(b)(1) are subject to an expedited removal process under § 1225(b)(1)(A)(i). In contrast, § 1225(b)(2) applies to a noncitizen who is an applicant for admission that is also "seeking admission." 8 U.S.C. § 1225(b)(2)(A). For these noncitizens, if the examining immigration officer determines that the noncitizen "is not clearly and beyond a doubt entitled to be admitted," then the noncitizen must be detained for removal proceedings (not expedited removal) under 8 U.S.C. § 1229a. *Id.*

b. Apprehension and Detention of Aliens.

In contrast, 8 U.S.C. § 1226 provides broad detention authority applicable to an "alien." 8 U.S.C. § 1226. Respondent argues that § 1226 is applicable "for the arrest, detention, and removal of foreign nationals who do not meet the criteria of

an 'applicant for admission.'" (ECF No. 7 at 6.) Referring to the plain language, 8 U.S.C. § 1226 applies to those who are "alien," and "alien" means "any person not a citizen or national of the United States." 8 U.S.C. § 1101(a)(3). The term "admitted" means "with respect to an alien, the lawful entry of the alien into the United States after inspection and authorization by an immigration officer." 8 U.S.C. § 1101 (a)(13)(A). Section 1226's text does not explicitly exclude "applicants for admission."

Rather, 8 U.S.C. § 1226 generally governs the process of "arresting and detaining" noncitizens who are already inside the United States but who are subject to removal. *Jennings*, 583 U.S. at 288. The law distinguishes between two different categories of noncitizens: those who may be released on bond pending a decision on removal, and those subject to mandatory detention due to their criminal history. *Id.* Those in the first category are governed by § 1226(a), which the Supreme Court has called the "default rule." *Id.* Those in the second category are governed by § 1226(c).

LEGAL STANDARD

The parties agree 28 U.S.C. § 2241(c)(3) is the applicable legal standard for a writ of habeas corpus, where the Petitioner bears the burden to prove that his incarceration is in violation of the Constitution or the laws or treaties of the United States. (ECF No. 7 at 6-7.) Petitioner does not request an evidentiary hearing.

ARGUMENT

I. The Plain Text of the INA coupled with DHS's arrest decision, congressional intent, and agency history support release

Petitioner proves his incarceration violates the laws of the United States when considering the text of the INA alone, and with additional supporting factors.

a. The textual structure of the INA establishes that Petitioner's detention is governed by § 1226.

"In statutory interpretation disputes, a court's proper starting point lies in a careful examination of the ordinary meaning and structure of the law itself." *Food Mktg. Inst. v. Argus Leader Media*, 588 U.S. 427, 436 (2019).

Respondent concludes that any "applicant for admission" is subject to mandatory detention pursuant to 8 U.S.C. § 1225 (b)(2)(A). (ECF No. 7 at 7.) However, that statutory interpretation would ignore the distinction between those seeking admission by an immigration officer (§ 1225(b)(2)(A)), and, those who pursuant to a warrant are arrested and detained pending a removal decision (§ 1226(a)).

The INA's text and structure shows that § 1225 and § 1226 apply in different circumstances. Section 1226 applies when, pursuant to a "warrant" issued by DHS, a noncitizen is "arrested and detained pending a decision on whether the alien is to be removed from the United States." 8 U.S.C. § 1226(a). In contrast, § 1225 applies when the noncitizen is before an "examining immigration officer" and is "seeking admission" to the United States. 8 U.S.C. § 1225(b)(2)(A). As the title to § 1225 indicates, that generally occurs when the noncitizen "arriv[es]." *See Jennings*, 583 U.S. at 287–88 (recognizing that § 1225 applies "at the Nation's borders and ports of entry," while § 1226 applies to aliens "once inside the United States"); *Ramirez Valverde v. Olson*, No. 25-cv-1502-bbc, 2025 WL 3022700 at *3 (E.D. Wis. Oct. 29, 2025) (Conway, J.) ("[t]he use of 'seeking' denotes an active and present effort. Thus, 'an alien seeking admission' is a noncitizen who, at the time of his arrest, is actively

and presently pursuing inspection and authorization by an immigration officer...".) The fact that § 1225 applies to "stowaway[s]" and "crewm[e]n" further reinforces its applicability to arriving noncitizens rather than those arrested pursuant to a warrant within the United States. *Pizarro Reyes v. Raycraft*, No. 25-cv-12546, 2025 WL 2609425, at *5 (E.D. Mich. Sept. 9, 2025).

In the present case, Petitioner was arrested and detained pursuant to a warrant. (ECF No. 1-6.) That warrant expressly references Section 236, which is 8 U.S.C. § 1226. (*Id.*) Petitioner was not apprehended at the border or a port of entry, and as discussed more fully below, was not "seeking admission" to the United States at the time. "It is difficult to find that § 1226(a) carries any meaning if the aliens it expressly addresses—those arrested and detained pursuant to warrants—are not actually subject to its provisions." *Campos Leon v. Forestal*, No. 1:25-cv-01774-SEB-MJD, 2025 WL 2694763 at *3 (S.D. Ind. Sept. 22, 2025), *appeal filed* Nov. 24 2025.

b. Section 1225 does not apply to Petitioner because he was not "seeking admission" when he was detained.

Respondent, citing to *Cirrus Rojas v. Olson*, No. 25-cv-1437-bhl, 2025 WL 3033967 (E.D. Wis. Oct. 30, 2025) (Ludwig, J.), *appeal filed*, Nov. 25, 2025, argues that there is no statutory basis that would make 8 U.S.C. § 1226 inapplicable to Petitioner's case. (ECF No. 7 at 10-12.) The Respondent argues, "the applicable statutory provision is 8 U.S.C. § 1225(b)(2)(A), which states that an application for admission 'shall be detained' during removal proceedings if an immigration officer

determines that the 'alien seeking admission is not clearly and beyond a doubt entitled to be admitted.'" (ECF No. 7 at 9.)

The above argument fails to recognize that within the subsection of § 1225 addressing detention, 8 U.S.C. § 1225(b)(2)(A), the term "seeking admission" modifies those "applicant[s] for admission" who are ineligible for bond:

> [I]n the case of an alien who is an applicant for admission, if the examining immigration officer determines that an alien *seeking admission* is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained for a proceeding under section 1229a of this title.

8 U.S.C. § 1225(b)(2)(A) (emphasis added). Section 1225(a)(1) defines "applicant for admission" as "[a]n alien present in the United States who has not been admitted or who arrives in the United States (whether or not at a designated port of arrival and including an alien who is brought to the United States after having been interdicted in international or United States waters)." However, for § 1225(b)(2)(A) to apply, the applicant for admission must also be "seeking admission." As this Court has recognized, this separate term must be given its own meaning different from "applicant for admission" to prevent rendering part of the statutory text surplusage. *Ramirez Valverde*, 2025 WL 3022700 at *2-3; *Lopez De La Cruz v. Schmidt*, No. 25-cv-1562, Doc. 18 at 10 (E.D. Wis. Nov. 19, 2025)(Adelman, J.).

If "seeking admission" has no separate meaning from "applicant for admission," the former term would do no work.

Moreover, the term "seeking admission" implies continuing action, such as requesting admission to the United States at a port of entry. *See Lopez Benitez v.*

Francis, 795 F. Supp. 3d 475, 488 (S.D.N.Y. 2025) ("the active construction of 'the phrase "seeking admission,"' though undefined in § 1225(b)(2)(A), 'necessarily implies some sort of present-tense action.'"). It would be inconsistent with the ordinary meaning of the words "seeking" and "admission" to describe a noncitizen like Petitioner—who was present in the United States for years at the time of detention and was not taking active steps to gain admission—as someone "seeking admission" at the time of his arrest.

c. Laken Riley amendment supports Petitioner's interpretation.

Respondent argues the Petitioner's interpretation outlined above "seeks to override Congress's deliberate legislative choice in passing the IIRIRA and restore the former statutory regime that Congress determined was unacceptable." (ECF No. 7 at 10.) However, recent Congressional modification of § 1226 supports Petitioner's position, not Respondent's.

On January 29, 2025, Congress and the President amended § 1226(c) by passing the Laken Riley Act, Pub. L. No. 119-1. That Act added a new subsection 1226(c)(1)(E) to the statute, providing for mandatory detention of a noncitizen who meets two conditions: (1) the noncitizen "is inadmissible under paragraph (6)(A), (6)(C), or (7) of section 1182(a) of this title," and (2) the noncitizen "is charged with, is arrested for, is convicted of, admits having committed, or admits committing acts which constitute the essential elements of any burglary, theft, larceny, shoplifting, or assault of a law enforcement officer offense, or any crime that results in death or serious bodily injury to another person." 8 U.S.C. § 1226(c)(1)(E).

According to the Laken Riley Act, being present in the United States without being admitted or paroled is insufficient alone to warrant mandatory detention. For this reason, DHS's current interpretation of § 1225(b)(2)(A)—under which all "alien[s] present in the United States without being admitted or paroled" are subject to detention under that section—renders the amendments made by the Laken Riley Act meaningless, in violation of the rule against surplusage. *See Corley v. United States*, 556 U.S. 303, 314 (2009) ("one of the most basic interpretive canons" is that a statute should be construed so that effect is given to all its provisions and no part will be inoperative or superfluous, void or insignificant).

d. Prior agency practice carries persuasive weight.

Respondent argues that the prior agency practice of applying § 1226(a) is an unpersuasive argument as it merely evidences the agency correcting its prior mistake (ECF No. 7 at 10.) Respectfully, a 28-year practice of recognizing a statutory distinction between §§ 1225 and 1226(a) through the course of five presidential administrations of different political parties, although not binding, does carry persuasive weight. *See Lopez De La Cruz*, No. 25-cv-1562, ECF No. 18 at 11-12.

e. No deference to BIA decision.

The BIA's recent decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA Sept. 5, 2025), which upheld DHS's new interpretation of § 1225, is not entitled to deference and is not persuasive authority. Although courts previously afforded Chevron[2] deference to BIA's interpretation of ambiguous immigration laws,

[2] *Chevron, U.S.A., Inc. v. Nat. Res. Def. Council, Inc.*, 467 U.S. 837 (1984).

see, e.g., Zaragoza v. Garland, 52 F.4th 1006, 1013 (7th Cir. 2022), that is no longer the case. *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 412 (2024).

f. Cases supporting DHS's interpretation of § 1225 are not persuasive.

Finally, Petitioner acknowledges two decisions issued by this Court have upheld DHS's position that all noncitizens present in the United States without admission are subject to detention without bond under § 1225(b)(2)(A). *See Rojas*, 2025 WL 3033967 at *5-10 (E.D. Wis. Oct. 2025), *appeal filed*, Nov. 25, 2025; *Ugarte-Arenas v. Olson*, No. 25-cv-1721, 2025 WL 3514451 at *3-4 (E.D. Wis. Dec. 8, 2025) (Griesbach, J.). *Rojas* acknowledged the statutory language and interplay between these sessions "could certainly be more clear," finding there was no statutory reason to fail to include the petitioner into a definition of "applicant for admission," thus triggering mandatory detention. *Rojas*, 2025 WL 3033967 at *10-15. The Court found unpersuasive arguments outlined in sections (I)(a) - (I)(d), *supra. Id. Ugarte-Arenas* reached the same conclusion. *Ugarte-Arenas*, 2025 WL 3514451 at *3-4 (E.D. Wis. Dec. 8, 2025).

Respectfully, the reasoning advanced in *Ramirez Valverde*, 2025 WL 3022700 at *2-3; *Lopez De La Cruz*, No. 25-cv-1562, at Doc. 18 at 10-12 ; and *Alonso v. Olson*, No. 25-cv-1660, 2025 WL 3240928 at *2 (E.D. Wis. Nov. 20, 2025)(Adelman, J.) renders the most faithful interpretation of the statutes at issue. As these opinions noted, finding that all applicants for admission are subject to mandatory detention does not take into account the full statutory text. Moreover, these decisions are in line with the majority of district courts that have rejected DHS's new interpretation

of § 1225(b)(2)(A). *See, e.g.*, *See Rojas*, 2025 WL 3033967 at *10 (E.D. Wis. Oct. 2025) (acknowledging that a majority of district courts have rejected DHS's new interpretation of § 1225(b)(2)(A)).

II. Alternatively, due process provides relief.

If the Court concludes that Petitioner is not in custody in violation of the INA, then it should grant the writ on the alternative ground that Petitioner's continued detention without an individualized bond hearing is contrary to the Due Process Clause of the Fifth Amendment.

Noncitizens like Petitioner "who have established connections in this country have due process rights in deportation proceedings." *Security v. Thuraissigiam*, 591 U.S. 103, 107 (2020); *see also Demore v. Kim*, 538 U.S. 510, 523 (2003) ("It is well established that the Fifth Amendment entitles aliens to due process of law in deportation proceedings."). In evaluating a procedural due process claim brought by a noncitizen detainee, courts within the Seventh Circuit apply the balancing test of *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976). *See Parra v. Perryman*, 172 F.3d 954, 958 (7th Cir. 1999); *Ruderman v. Kolitwenzew*, 459 F. Supp. 3d 1121, 1132 (C.D. Ill. 2020). Under *Mathews*, the Court weighs: (1) "the private interest that will be affected by the official action"; (2) "the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards"; and (3) "the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail." *Mathews*, 424 U.S. at 335.

Turning to the first *Mathews* factor, Petitioner has a significant private interest in remaining free from detention. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). His continued detention is an extreme incursion on his liberty interest in remaining at home pending the outcome of his removal proceedings.

Second, "'the risk of an erroneous deprivation [of liberty] is high' where, as here, '[Petitioner] has not received any bond or custody redetermination hearing.'" *Rodriguez v. Kaiser*, No. 1:25-CV-01111-KES-SAB (HC), 2025 WL 2855193, at *6 (E.D. Cal. Oct. 8, 2025) (quoting *A.E. v. Andrews*, No. 1:25-cv-00107-KES-SKO, 2025 WL 1424382, at *5 (E.D. Cal. May 16, 2025), report and recommendation adopted 2025 WL 1808676 (July 1, 2025)). Civil immigration detention, which is "nonpunitive in purpose and effect[,]" is ordinarily justified when a noncitizen presents a risk of flight or danger to the community. *See Zadvydas*, 533 U.S. at 690. Petitioner has no criminal convictions and, because of his ties to the community in Milwaukee, is not a flight risk. Moreover, although the tentative decision issued in *Castanon-Nava v. U.S. Dep't of Homeland Security* is not precedential, the panel's conclusion–that the Government is "not likely to succeed on the merits" of its interpretation of 8 U.S.C. 1225(b)(2)(A)–is persuasive, making it more likely Petitioner's incarceration is erroneous. *Castanon-Nava v. U.S. Dep't of Homeland Security*, —F.4th–, 2025 WL 3552514, at *8-10 (7th Cir. 2025).

Third, the government's interest in detaining Petitioner without a hearing is low. *Rodriguez*, 2025 WL 2855193, at *7. In immigration court, custody hearings are routine and impose a "minimal" cost. *Id.* The government's interest is further diminished where a person has never been convicted of a crime. *Id.*

On balance, then, the *Mathews* factors show that Petitioner is entitled to a bond hearing.

III. Violation of Rights as *Bautista* Class Member.

On November 25, 2025, the U.S. District Court for the Central District of California issued an order in *Bautista v. Santacruz*, No. 5:25-cv-01873, ECF No. 82 at 15, 2025 WL 3288403 at *9 (C.D. Cal. Nov. 25, 2025) (Sykes, J.), certifying a nationwide class of individuals: the Bond Eligible Class. The Bond Eligible Class covers:

> All noncitizens in the United States without lawful status who (1) have entered or will enter the United States without inspection; (2) were not or will not be apprehended upon arrival; and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the Department of Homeland Security makes an initial custody determination."

Id. Those who are class members receive declaratory relief. *Id.* Specifically the *Bautista* court held that the Bond Eligible Class members are detained under 8 U.S.C. § 1226(a), and thus may not be denied consideration for release on bond under § 1225(b)(2)(A). *Id.*, *see also Bautista v. Santacruz*, No. 5:25-cv-01873, ECF No. 81 at 14-17, 2025 WL 3289861 at *11 (C.D. Cal. Nov. 20, 2025) (Sykes, J.). Final partial summary judgment entered December 18, 2025, and that decision is being

appealed. *Bautista v. Santacruz*, No. 5:25-cv-01873, 2025 WL 3713987 at *32 (C.D. Cal. Dec. 18, 2025), *appeal docketed* Dec. 19, 2025 No. 25-7958.

Notably, *Bautista* did not include habeas claims on behalf of the class. Thus, the value of *Bautista* is that the court has already declared a statutory violation on behalf of Petitioner as a Class Member. *See e.g. Morales-Flores v. Lyons*, 1:25-cv-1640, 2025 WL 3552841, at *3 (E.D. Cal. Dec. 11, 2025)("This Court agrees with the chorus of well-reasoned and compelling decisions and finds no reason to reconsider its prior rulings. Particularly as the *Maldonado Bautista* court has already declared a statutory violation on behalf of Petitioner as a class member.").

Respondent does not dispute the Petitioner's claim to membership in the *Bautista* Bond Eligible Class. (ECF No. 7 at 15-19.) Rather, Respondent argues that the *Bautista* ruling is neither binding nor applicable to his petition for a writ of habeas corpus (*Id.* at 15.) Respondent argues "[t]his is core habeas relief that must be brought as a habeas claim alone," arguing that this court lacks jurisdiction as the *Bautista* decision lies outside of the jurisdiction of confinement, and, fails to name the Petitioner's immediate custodian (ECF No. 7 at 15-16.) This argument hinges on the conclusion that the *Bautista* decision provides core habeas relief, as in *Trump v. J.G.G.*, 604 U.S. 670, 672 (2025). In that case, Venezuelan foreign nationals obtained temporary restraining orders ("TROs") barring the Government from removing them, and preventing removal under the AEA of a provisionally certified class. *Id.* at 671. The Court vacated the TROs and found that challenges to removal under the AEA, a statute which largely "preclude[s] judicial review," must be

brought in habeas. *Id.* at 671-72. Unlike *J.G.G.*, *Bautista* does not issue an order barring removal or mandating release, rather *Bautista* is limited to identifying the cases in which a noncitizen would be entitled to an individualized bond hearing. Moreover, unlike *J.G.G.* where the court vacated a nationwide injunction, the *Bautista* court issued declaratory relief alone.

In *Garland v. Aleman Gonzalez*, the Supreme Court interpreted 8 U.S.C. § 1252(f)(1) to prohibit classwide injunctive relief regarding certain immigration detention statutes like the ones at issue here. 596 U.S. 543, 548-52 (2022). However, § 1252(f)(1) does not bar other forms of relief, like classwide declaratory relief. *See, e.g., Al Otro Lado v. Exec. Off. For Immigr. Rev.* 138 F.4th 1002, 1123-24 (9th Cir. 2025).

Respondent argues that issue preclusion should not apply in the context of a habeas. (ECF No. 7 at 18-19.) But requiring each unlawfully detained individual to file a habeas action with the federal court in the jurisdiction of his detention is equally untenable. And again, *Bautista* does not require release; *Bautista* clarifies the law confirming that Petitioner is entitled to an individualized bond hearing. Application of issue preclusion would not result in release of all Class Members, it merely affords the opportunity for Class Members to be heard on bond. If the Court should not find *Bautista* binding, it at a minimum constitutes persuasive authority, supporting the arguments set forth in Section I, *supra*.

CONCLUSION

Petitioner respectfully requests that the Court grant his petition for a writ of habeas corpus and order that Respondents release Petitioner from detention unless, within 3 business days from the date of the Court's order, Petitioner is provided with an individualized bond hearing pursuant to 8 U.S.C. § 1226(a). The Court should make clear that, at the hearing, the immigration judge must exercise jurisdiction to consider granting Petitioner release on bond based on an individualized determination of the usual factors considered at a bond hearing (such as whether he is a flight risk or a danger to the community) and must not consider Petitioner subject to detention without bond under 8 U.S.C. § 1225(b)(2)(A).

Dated at Wausau, Wisconsin, this 29th day of December, 2025.

Respectfully submitted,

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By: /s/ electronically signed by KFD

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