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UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF GEORGIA

ALEJANDRO GUZMAN TAPIA,  
Petitioner,

v.

JOHN TSOUKARIS, Field Office Director of  
Enforcement and Removal Operations,  
ATLANTA Field Office, Immigration and  
Customs Enforcement;  
KRISTI NOEM, Secretary, U.S. Department of  
Homeland Security; U.S. DEPARTMENT OF  
HOMELAND SECURITY;  
PAMELA BONDI, U.S. Attorney General;  
EXECUTIVE OFFICE FOR IMMIGRATION  
REVIEW;  
JASON STREEVAL, Warden of STEWART  
DETENTION CENTER,  
Respondents.

Case No.

**PETITION FOR WRIT OF  
HABEAS CORPUS**

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## INTRODUCTION

1. Petitioner **ALEJANDRO GUZMAN TAPIA** brings this petition for a writ of habeas corpus to seek enforcement of their rights as members of the Bond Denial Class certified in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM (C.D. Cal.). Petitioner is in the physical custody of Respondents at the **Stewart Detention Center in Lumpkin, Georgia**. Petitioner now faces unlawful detention because the Department of Homeland Security (DHS) and the Executive Office for Immigration Review (EOIR) have refused to abide by the declaratory judgment issued on behalf of the certified class in *Maldonado Bautista v. Santacruz*.

2. On November 20, 2025, the district court granted partial summary judgment on behalf of individual plaintiffs and on November 25, 2025, certified a nationwide class and extended declaratory judgment to the certified class. *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3289861, at \*11 (C.D. Cal. Nov. 20, 2025) (order granting partial summary judgment to named Plaintiffs-Petitioners); *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3288403, at \*9 (C.D. Cal. Nov. 25, 2025) (order certifying Plaintiffs-Petitioners' proposed nationwide Bond Eligible Class, incorporating and extending declaratory judgment from Order Granting Petitioners' Motion for Partial Summary Judgment).

3. The declaratory judgment held that the Bond Denial 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). *Maldonado Bautista*, 2025 WL 3289861, at \*11.

4. On December 18, 2025, the district court issued an Amended Consolidated Order and entered final judgment in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, granting Petitioners' Motion for Partial Summary Judgment, certifying the Bond Eligible Class,

1 and vacating the DHS policy under the Administrative Procedure Act. The Court declared that  
2 class members are detained under 8 U.S.C. § 1226(a), not subject to mandatory detention under §  
3 1225(b)(2), and entitled to consideration for release on bond and custody redetermination  
4 hearings before an immigration judge. The Court further clarified that its prior declaratory  
5 judgment applies nationwide and vacated DHS's July 8, 2025 "Interim Guidance Regarding  
6 Detention Authority for Applicants for Admission" as unlawful. Final judgment was entered as  
7 to Counts I, II, and III of the Amended Class Complaint, and the Bond Eligible Class was  
8 certified under Rule 23(b)(2). *Maldonado Bautista v. Santacruz*, --- F. Supp. 3d ---, 2025 WL  
9 3549826, at \*1–11 (C.D. Cal. Dec. 18, 2025) (Amended Order consolidating MSJ, Class  
10 Certification, and Reconsideration Orders; entering final judgment and vacatur); *id.*, 2025 WL  
11 3549854, at \*2 (Final Judgment).

12 5. Immigration Judges at Stewart Immigration Detention Center continue to decline  
13 jurisdiction following the entry of final judgment. The Executive Office for Immigration Review  
14 and its subagency the Immigration Court and the Department of Homeland Security (DHS) have  
15 blatantly refused to abide by the declaratory relief and have unlawfully ordered that others  
16 similarly situated to Petitioner be denied the opportunity to be released on bond.

17 6. Petitioner ALEJANDRO GUZMAN TAPIA is a member of the Bond Eligible  
18 Class, as he:

19 a. does not have lawful status in the United States and is currently detained at the  
20 Stewart Detention Center in Lumpkin, Georgia. He was apprehended by  
21 immigration authorities on November 6, 2025;

22 b. entered the United States without inspection over 25 years ago (on or about  
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1 July 30, 2000) and was not apprehended upon arrival, cf. id.; and

2 c. is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231.

3 7. After apprehending Petitioner on November 6, 2025, DHS placed him in removal  
4 proceedings pursuant to 8 U.S.C. § 1229a. DHS has charged Petitioner as being  
5 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i), as someone who entered the United  
6 States without inspection.

7 8. The Court should expeditiously grant this petition.

8 9. Respondents are bound by the judgment in *Maldonado Bautista*, as it has the full “force  
9 and effect of a final judgment.” 28 U.S.C. § 2201(a). Nevertheless, Respondents continue  
10 to flagrantly defy the judgment in that case and continue to subject Petitioner  
11 ALEJANDRO GUZMAN TAPIA to unlawful detention despite his clear entitlement to  
12 consideration for release on bond as a Bond Eligible Class member.

13 10. Even before the most recent orders and clarifications were released, immigration judges  
14 have informed class members in bond hearings that they have been instructed by  
15 “leadership” that the declaratory judgment in *Maldonado Bautista* is not controlling, even  
16 with respect to class members, and that instead IJs remain bound to follow the agency’s  
17 prior decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).

18 11. Because Respondents are detaining Petitioner in violation of the binding judgment issued  
19 in *Maldonado Bautista*, the Court should accordingly order that within one day,  
20 Respondent DHS must release Petitioner.

21 12. Alternatively, the Court should order Petitioner’s release unless Respondents provide a  
22 bond hearing under 8 U.S.C. § 1226(a) within seven days.

1 13. Accordingly, Petitioner seeks a writ of habeas corpus requiring that she be released  
2 unless Respondents provide a bond hearing under § 1226(a) within seven days.

3 **JURISDICTION**

4 14. Petitioner is in the physical custody of Respondents. Petitioner is detained at the  
5 STEWART DETENTION CENTER in LUMPKIN, GEORGIA.

6 15. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. §  
7 1331 (federal question), and Article I, section 9, clause 2 of the United States  
8 Constitution (the Suspension Clause).

9 16. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act,  
10 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

11 **VENUE**

12 17. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493- 500  
13 (1973), venue lies in the United States District Court for the MIDDLE DISTRICT OF  
14 GEORGIA, the judicial district in which Petitioner currently is detained.

15 18. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because  
16 Respondents are employees, officers, and agencies of the United States, and because a  
17 substantial part of the events or omissions giving rise to the claims occurred in the  
18 MIDDLE DISTRICT OF GEORGIA.

19  
20 **REQUIREMENTS OF 28 U.S.C. § 2243**

21 19. The Court must grant the petition for writ of habeas corpus or order Respondents to show  
22 cause “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an  
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1 order to show cause is issued, Respondents must file a return “within three days unless  
2 for good cause additional time, not exceeding twenty days, is allowed.” Id.

3 20. Habeas corpus is “perhaps the most important writ known to the constitutional law . . .  
4 affording as it does a *swift* and imperative remedy in all cases of illegal restraint or  
5 confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). “The application  
6 for the writ usurps the attention and displaces the calendar of the judge or justice who  
7 entertains it and receives prompt action from him within the four corners of the  
8 application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

9 21. The Court should grant the petition for writ of habeas corpus “forthwith,” as the legal  
10 issues have already been resolved for class members in *Maldonado Bautista*.

11 **PARTIES**

12 22. Petitioner ALEJANDRO GUZMAN TAPIA is alleged to be a citizen of Mexico who has  
13 been in immigration detention since November 6, 2025. After Petitioner was arrested,  
14 ICE did not set bond, and Petitioner requested review of his custody by an Immigration  
15 Judge. On November 12, 2025, Petitioner was denied bond by an Immigration Judge at  
16 the Lumpkin Immigration Court because he was deemed an “applicant for admission.”  
17 Petitioner has resided in the United States since July 30, 2000.

18 23. Respondent JOHN TSOUKARIS is the Director of the Atlanta Field Office of ICE’s  
19 Enforcement and Removal Operations division; however, on information and belief, the  
20 DHS is rotating their Field Office Director without publishing a schedule of rotation. As  
21 such, JOHN TSOUKARIS or his unknown, unannounced provisional replacement is  
22 Petitioner’s immediate custodian and is responsible for Petitioner’s detention and  
23 removal. He or his acting counterpart is named in his or her official capacity.  
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1 24. Respondent Kristi Noem is the Secretary of the Department of Homeland Security. She is  
2 responsible for the implementation and enforcement of the Immigration and Nationality  
3 Act (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms. Noem  
4 has ultimate custodial authority over Petitioner and is sued in her official capacity.

5 25. Respondent Department of Homeland Security (DHS) is the federal agency responsible  
6 for implementing and enforcing the INA, including the detention and removal of  
7 noncitizens.

8 26. Respondent Pamela Bondi is the Attorney General of the United States. She is  
9 responsible for the Department of Justice, of which the Executive Office for Immigration  
10 Review and the immigration court system it operates is a component agency. She is sued  
11 in her official capacity.

12 27. Respondent Executive Office for Immigration Review (EOIR) is the federal agency  
13 responsible for implementing and enforcing the INA in removal proceedings, including  
14 for custody redeterminations in bond hearings.

15 28. Respondent, Warden Jason Streevalis, is employed by the private, for-profit detention  
16 corporation contracted by the Government as an agent to confine immigrants at Stewart  
17 Detention Center, where Petitioner is detained. He has immediate physical custody of  
18 Petitioner. He is sued in his official capacity.

19 **CLAIMS FOR RELIEF**

20 **COUNT I**  
21 **Violation of the INA**

22 **Request for Relief Pursuant to *Maldonado Bautista***

23 29. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in  
24 the preceding paragraphs as if fully set forth herein.

1 30. As a member of the Bond Eligible Class, Petitioner is entitled to consideration for release  
2 on bond under 8 U.S.C. § 1226(a).

3 31. The order granting partial summary judgment in Maldonado Bautista holds that  
4 Respondents violate the INA in applying the mandatory detention statute at § 1225(b)(2)  
5 to class members.

6 32. The order granting class certification in Maldonado Bautista further orders that “[w]hen  
7 considering this determination with the MSJ Order, the Court extends the same declaratory  
8 relief granted to Petitioners to the Bond Eligible Class as a whole.”

9 33. Respondents are parties to Maldonado Bautista and bound by the Court’s declaratory  
10 judgment, which has the full “force and effect of a final judgment.” 28 U.S.C. § 2201(a).

11 34. The Court’s Amended Consolidated Order and Final Judgment issued on December 18,  
12 2025, eliminates any doubt: Petitioner ALEJANDRO GUZMAN TAPIA’s eligibility for  
13 class relief is abundantly clear and binding on all Immigration Judges nationwide. The  
14 Court expressly extended the declaratory judgment to the Bond Eligible Class as a whole  
15 and vacated DHS’s July 8, 2025 policy under the Administrative Procedure Act.

16 35. By certifying a nationwide class under Rule 23(b)(2) and entering final judgment, the Court  
17 confirmed that members of the Bond Eligible Class—including Petitioner—are detained  
18 under 8 U.S.C. § 1226(a), not § 1225(b)(2), and are entitled to consideration for release on  
19 bond and custody redetermination hearings. Respondents and all adjudicators within EOIR  
20 are bound by this judgment, which carries the full “force and effect of a final judgment”  
21 under 28 U.S.C. § 2201(a).

22 36. Any continued reliance on § 1225(b)(2) to deny bond hearings to class members constitutes  
23 a direct violation of federal law and the Court’s binding order.  
24

1 37. By denying other class members a bond hearing under § 1226(a) and asserting that they  
2 are subject to mandatory detention under § 1225(b)(2), Respondents violate Petitioner's  
3 statutory rights under the INA and the Court's judgment in Maldonado Bautista.  
4

#### 5 LEGAL FRAMEWORK

6 38. The INA prescribes three basic forms of detention for the vast majority of noncitizens in  
7 removal proceedings.

8 39. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal  
9 proceedings before an IJ. *See* 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are  
10 generally entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§  
11 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or  
12 convicted of certain crimes are subject to mandatory detention, *see* 8 U.S.C. § 1226(c).

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

16 41. Last, the INA also provides for detention of noncitizens who have been ordered removed,  
17 including individuals in withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b).

18 42. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

19 43. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal  
20 Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No.  
21 104–208, Div. C, §§ 302–03, 110 Stat. 3009-546, 3009–582 to 3009–583, 3009–585.  
22 Section 1226(a) was most recently amended earlier this year by the Laken Riley Act,  
23 Pub. L. No.119-1, 139 Stat. 3 (2025).  
24

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

6 45. Thus, in the decades that followed, most people who entered without inspection and were  
7 placed in standard removal proceedings received bond hearings, unless their criminal  
8 history rendered them ineligible pursuant to 8 U.S.C. § 1226(c). That practice was  
9 consistent with many more decades of prior practice, in which noncitizens who were not  
10 deemed “arriving” were entitled to a custody hearing before an IJ or other hearing officer.  
11 *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229 (1996)  
12 (noting that § 1226(a) simply “restates” the detention authority previously found at §  
13 1252(a)).

14 46. In *Jennings v. Rodriguez*, the Department of Homeland Security (DHS) explicitly  
15 acknowledged that individuals who have already entered the United States and are not  
16 apprehended within 100 miles of the border or within 14 days of entry are subject to  
17 discretionary detention under 8 U.S.C. § 1226(a), not mandatory detention under §  
18 1225(b). During oral argument on November 30, 2016, then-Solicitor General Ian  
19 Gershengorn stated: “If they are not detained within 100 miles of the border or within 14  
20 days... then they are under 1226(a) and not 1226(c)” and further clarified, in response to  
21 a question concerning “an alien who has come into the United States illegally without  
22 being admitted [and] who takes up residence 50 miles from the border,” the Government  
23 responded, “The answer is they are held under 1226(a) and that they get a bond  
24

1 hearing...” Transcript of Oral Argument at 7–8, *Jennings v. Rodriguez*, 583 U.S. \_\_\_\_  
2 (2018) (No. 15-1204). DHS reiterated that such individuals “would be held under  
3 1226(a)” and cited the administrative record to support that position. *Id.* These statements  
4 reflect DHS’s prior litigation stance that § 1226(a) governs detention for noncitizens who  
5 have entered and are residing in the United States, a position directly contrary to the  
6 agency’s current interpretation applying § 1225(b)(2)(A) to such individuals. Having  
7 prevailed in *Jennings* after taking this position, they should be estopped from taking the  
8 contrary position now simply because their political or litigation interests have changed.  
9 Estoppel in this case is necessary to preserve the predictability inherent in the rule of law  
10 and due process under the Fifth Amendment, as well as to protect the integrity of the  
11 judicial system.

12 47. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new policy that rejected  
13 well-established understanding of the statutory framework and reversed decades of  
14 practice.

15 48. The new policy, entitled “Interim Guidance Regarding Detention Authority for  
16 Applicants for Admission,”<sup>1</sup> claims that all persons who entered the United States  
17 without inspection shall now be subject to mandatory detention provision under §  
18 1225(b)(2)(A). The policy applies regardless of when a person is apprehended, and  
19 affects those who have resided in the United States for months, years, and even decades.

20 49. On September 5, 2025, the BIA adopted this same position in a published decision,  
21 *Matter of Yajure Hurtado*. There, the Board held that all noncitizens who entered the  
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23 \_\_\_\_\_  
24 <sup>1</sup> Available at <https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission>.

1 United States without admission or parole are subject to detention under § 1225(b)(2)(A)  
2 and are ineligible for IJ bond hearings.

3 50. Since Respondents adopted their new policies, several federal courts have rejected their  
4 new interpretation of the INA's detention authorities. Courts have likewise rejected  
5 *Matter of Yajure Hurtado*, which adopts the same reading of the statute as ICE.

6 51. A growing number of federal courts have rejected ICE and EOIR's expanded  
7 interpretation of the Immigration and Nationality Act's detention provisions. These  
8 courts have consistently held that § 1226(a), not § 1225(b)(2), governs the detention  
9 authority applicable in these cases. For example, courts in Massachusetts, Arizona, New  
10 York, Minnesota, California, and Nebraska have reached this conclusion. See: *Gomes v.*  
11 *Hyde*, No. 1:25-CV-11571-JEK (D. Mass. July 7, 2025); *Rosado v. Figueroa*, No. CV  
12 25-02157 PHX DLR (CDB) (D. Ariz. Aug. 11, 2025); *Lopez Benitez v. Francis*, No. 25  
13 CIV.5937 (DEH) (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-  
14 SRN-SGE (D. Minn. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM (D. Mass.  
15 Aug. 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF (N.D. Cal. Aug. 21,  
16 2025); *Palma Perez v. Berg*, No. 8:25CV494 (D. Neb. Sept. 3, 2025).

17 52. As of December 18<sup>th</sup>, 2025, the DHS policy was VACATED. *Maldonado Bautista v.*  
18 *Santacruz*, No. 5:25-cv-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3549826, at \*8-  
19 9 (C.D. Cal. Dec. 18, 2025) (vacating DHS's July 8, 2025 "Interim Guidance Regarding  
20 Detention Authority for Applicants for Admission" under the Administrative Procedure  
21 Act); *id.*, 2025 WL 3549854, at \*2 (entering final judgment as to Counts I-III).

1 53. These decisions reflect a clear judicial consensus, now binding nationally as to class  
2 members, that the government's reliance on § 1225(b)(2) is misplaced in cases involving  
3 those whose immigration status lawfully falls under § 1226(a).

4 54. Section 1226 therefore leaves no doubt that it applies to people who face charges of being  
5 inadmissible to the United States, including those who are present without admission or  
6 parole.

7 55. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently  
8 entered the United States and were not free to mingle with the general population after  
9 being free from official restraint. The statute's entire framework is premised on  
10 inspections at the border of people who are "seeking admission" to the United States. 8  
11 U.S.C. § 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory  
12 detention scheme applies "at the Nation's borders and ports of entry, where the  
13 Government must determine whether a[] [noncitizen] seeking to enter the country is  
14 admissible." *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018).

15  
16 **FACTS**

17 56. Petitioner ALEJANDRO GUZMAN TAPIA is a 50-year-old citizen of Mexico who has  
18 resided in the United States since July 30, 2000. He entered without inspection and was  
19 not apprehended upon arrival. On November 6, 2025, Petitioner was arrested by  
20 immigration authorities in Lumpkin, Georgia and placed in DHS custody at the Stewart  
21 Detention Center. ICE did not set bond, and Petitioner requested review of his custody by  
22 an Immigration Judge. On November 12, 2025, the Lumpkin Immigration Court denied  
23 bond, deeming Petitioner an "applicant for admission" under 8 U.S.C. § 1225(b)(2).

1 57. Petitioner is not detained under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231. DHS has  
2 charged Petitioner as inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) and placed him in  
3 removal proceedings pursuant to 8 U.S.C. § 1229a. Petitioner is a member of the Bond  
4 Eligible Class certified in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-  
5 BFM (C.D. Cal.), which includes noncitizens without lawful status who entered without  
6 inspection and are not subject to mandatory detention under the INA.

7 58. Despite the Court's declaratory judgment and final order in *Maldonado Bautista*—  
8 holding that class members are detained under 8 U.S.C. § 1226(a) and entitled to  
9 consideration for release on bond—Respondents continue to apply § 1225(b)(2) and deny  
10 bond hearings to class members, including Petitioner. Immigration Judges at Stewart  
11 Detention Center have refused jurisdiction, citing agency directives to disregard the  
12 Court's earlier rulings, and insisting on awaiting guidance from the 11<sup>th</sup> Circuit or EOIR  
13 to assume jurisdiction. Respondents' continued detention of Petitioner violates the INA  
14 and the binding judgment in *Maldonado Bautista*.

15  
16 **PRAYER FOR RELIEF**

17 WHEREFORE, Petitioner prays that this Court grant the following relief:

- 18 a. Assume jurisdiction over this matter;
- 19 b. Issue a writ of habeas corpus requiring that within one day, Respondents release  
20 Petitioner;
- 21 c. Alternatively, issue a writ of habeas corpus requiring Respondents to release Petitioner  
22 unless they provide a bond hearing under 8 U.S.C. § 1226(a) within seven days;  
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1 d. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act (EAJA),  
2 as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

3 e. Grant any other and further relief that this Court deems just and proper.  
4

5 DATED this 21st day of December, 2025.

6 **/s/ Joshua McCall, Esq.**

7 Joshua McCall, Esq.

8 Attorney for Defendant

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