UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 0:25-cv-04779-JRT-EMB

Abdirashid Hirsi Mohamed,

Plaintiff,

v.

Kristi Noem, Secretary, U.S. Department of Homeland Security, in her official capacity; Todd M. Lyons, Director of Immigration and Customs Enforcement, in his official capacity; Peter Berg, Director, St. Paul Field Office, Immigration and Customs Enforcement, in his official capacity; Samuel J. Olson, Field Office Director of Enforcement and Removal Operations, Chicago Field Office, Immigration and Customs Enforcement, in his official capacity; Joel Brott, Sheriff of Sherburne County Jail, Minnesota, custodian of detainees of the Sherburne County Jail,

Respondents.

RESPONSE TO PETITION FOR WRIT OF HABEAS CORPUS

Federal Respondents[1] submit this response to Petitioner Abdirashid Hirsi Mohamed's ("Petitioner" or "Mohamed") verified petition for writ of habeas corpus (ECF No. 1) pursuant to the Court's briefing order. (ECF No. 3.) Petitioner wants an immigration court to conduct a bond hearing in connection with his detention by the U.S.

[1] The Federal Respondents are Kristi Noem, Secretary, U.S. Department of Homeland Security, in her official capacity; Todd M. Lyons, Director of Immigration and Customs Enforcement, in his official capacity; Peter Berg, Director, St. Paul Field Office, Immigration and Customs Enforcement, in his official capacity; Samuel J. Olson, Field Office Director of Enforcement and Removal Operations, Chicago Field Office, Immigration and Customs Enforcement, in his official capacity. This response is not offered on behalf of any state authority.

Immigration and Customs Enforcement ("ICE"). Petitioner is not entitled to habeas relief because his detention is mandatory—he is not eligible for bond or a bond hearing. Petitioner claims he is entitled to a bond hearing under § 1226(a). But he is an "applicant for admission" under § 1225 and is therefore subject to mandatory detention under § 1225(b)(1). Accordingly, his petition should be dismissed.

RELEVANT BACKGROUND

Petitioner is a native and citizen of Somalia. (Declaration of James L. Van Der Vaart ("Van Der Vaart Decl.") ¶ 4, Ex. 1.) He entered the United States without inspection, admission, or parole, when on October 21, 2024, U.S. Border Patrol (USBP) encountered the Petitioner near Dulzura, California. (*Id.*; ECF No. 1 at ¶ 13.) Mohamed claimed to be a citizen and national of Somalia and was not in possession of any valid immigration documents that would allow him to enter, pass through, or remain in the United States. (Van Der Vaart Decl. ¶ 4.) USBP issued an Expedited Removal Order and assigned an Alien Registration Number. (*Id.*)

Nine days later, on October 30, Petitioner claimed a fear of return to his country, (Van Der Vaart Decl. ¶ 5.) Two days later, on November 1, 2024, ICE served form M-444 information about credible fear interview. (*Id.* ¶ 6.) Mohamed acknowledged the form and ICE submitted a Credible Fear packet to U.S. Citizenship and Immigration Services (USCIS). (*Id.*)

On November 21, 2024, USCIS issued a positive fear finding which triggered the issuance of a Notice to Appear (NTA) in immigration court at Los Angeles, California. (Van Der Vaart Decl. ¶ 7, Ex. 2.) On December 12, 2024, an immigration judge (IJ)

granted a Change of Venue (COV) to move immigration proceedings to St. Paul, Minnesota. (*Id.* ¶ 8.) On November 26, 2024, ICE Enforcement and Removal Operations (ERO) officers released Mohamed on parole enrolling him in the Alternatives to Detention (ATD) program. (*Id.* ¶ 9.) The ATD is an ICE-supervised release program that "enables aliens to remain in their communities. . . as they move through immigration proceedings or prepare for departure." *Alternatives to Detention*, Immigrations and Customs Enforcement, https://www.ice.gov/features/atd (last visited January 2, 2026). Mohamed was entered into the ATD program in St. Paul, Minnesota. (*Id.*)

On December 4, 2025, ICE St. Paul arrested Mohamed due to multiple violations of the ATD program by missing three (3) separate biometric check ins over a 10-month period in 2025. (Van Der Vaart Decl. ¶ 10.) On December 30, 2025, an IJ at Fort Snelling, MN continued the Master Calendar Hearing to January 13, 2026. (*Id.* ¶ 11.)

ARGUMENT

The Court is familiar by now with the detention provisions in §§ 1225 and 1226. But most of the recent litigation has focused specifically on § 1225(b)(2), which imposes mandatory detention on "applicants for admission . . . seeking admission" into the United States. 8 U.S.C. § 1225(b)(2)(A). *See, e.g.*, *Rodas Rodas v. Bondi et al.*, 25-cv-3432 (JRT/LIB) ECF No. 22, Am. Mem. and Order (D. Minn. Oct. 30, 2025). Petitioner's detention is mandatory under 8 U.S.C. § 1225—he is not eligible for bond or a bond

hearing. In the alternative, Petitioner is an asylum seeker subject to § 1225(b)(1), not (b)(2) and is also subject to mandatory detention on these grounds.[2]

I. Petitioner is subject to mandatory detention under § 1225(b)(2)

Count Two of the Petition asserts that Petitioner is subject to detention under § 1226 rather than under § 1225. (ECF No. 1 ¶¶ 57-59.) The Court is familiar with this issue by now and has already ruled on the government's arguments for holding that detention under these circumstances is appropriately characterized as mandatory detention pursuant to § 1225. *See, e.g.*, *Rodas v. Bondi et al.*, 25-cv-3432 (JRT/LIB) ECF No. 22, Am. Mem. and Order at 15-19 (Oct. 30, 2025). Although the Eighth Circuit is poised to weigh-in soon, *see Avila v. Bondi*, No. 25-3248 (8th Cir. docketed Nov. 10, 2025), the Federal Respondents acknowledge that—***with one exception discussed below regarding Petitioner's asylum application***—this case presents similar legal and factual issues to prior habeas petitions.

Rather than belabor these proceedings further by re-arguing points that the Court has already considered and rejected, the Federal Respondents will: (1) offer additional authority that the Court may not have previously considered; and (2) summarize the legal

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[2] The United States recognizes that other courts in this district have decided cases raising nearly identical issues to those addressed by this Court. The United States has appealed *Avila v. Bondi*, No. 25-cv-3741 (JRT/SGE), 2025 WL 2976539, at *1 (D. Minn. Oct. 21, 2025), to the Eighth Circuit. The United States has requested an expedited briefing schedule. *Avila v. Bondi*, No. 25-3248 (8th Cir.). The United States also notes that a district court in California certified a class and issued an order finding 1226 applied to that class, rather than 1225. Order, *Bautista v. Santacruz, et al.*, 5:25-cv-01873-SSS-BFM (C.D. Cal. Nov. 20, 2025) (ECF 81) (certifying class); Order, *Bautista v. Santacruz, et al.*, 5:25-cv-01873-SSS-BFM (C.D. Cal. Nov. 20, 2025) (ECF 82) (granting partial summary judgment on 1225/1226 issues).

basis for the government's interpretation. The Federal Respondents request that the Court note the arguments made below and in *Rodas* and hold that they are preserved for appeal in this case.

A. Additional Authority

Courts across the country have agreed with the government's interpretation of § 1225 in factually similar cases. *See, e.g.*, *Calderon Lopez v. Lyons*, 2025 WL 3683918 (N.D. Tex. Dec. 19, 2025); *Urbina Zapata v. Chestnut*, 2025 WL 3687643 (E.D. Cal. Dec. 19, 2025); *E.R.J.B. v. Wofford*, 2025 WL 3683118 (E.D. Cal. Dec. 18, 2025); *Romero Rebolledo v. Chestnut*, 2025 WL 3683122 (E.D. Cal. Dec. 18, 2025); *Liang v. Almodovar*, 2025 WL 3641512 (S.D.N.Y. Dec. 15, 2025); *Pablo Coronado v. Secretary, DHS*, 2025 WL 3628229 (S.D. Ohio Dec. 15, 2025); *P.B. v. Bergami*, 2025 WL 3632752 (N.D. Tex. Dec. 13, 2025); *Yanyun Mo v. Chestnut*, 2025 WL 3539063 (E.D. Cal. Dec. 10, 2025); *Ugarte-Arenas v. Olson*, (E.D. Wis. Dec. 8, 2025); *Chen v. Almodovar*, 2025 WL 3484855 (S.D.N.Y. Dec. 4, 2025); *Candido v. Bondi*, 2025 WL 7484932, (W.D.N.Y. Dec. 4, 2025); *Topal v. Bondi*, 2025 WL 3486894 (W.D. La. Dec. 3, 2025); *Hernandez Cruz v. Noem*, 2025 WL 3482630 (C.D. Cal. Dec. 2, 2025); *Maceda Jimenez v. Thompson*, 2025 WL 3265493 (S.D. Tex. Nov. 24, 2025); *Alves De Andrade v. Patterson*, 2025 WL 3252707 (W.D. La. Nov. 21, 2025); *Valencia v. Chestnut*, 2025 WL 3205133 (E.D. Cal. Nov. 17, 2025); *Alonzo v. Noem*, 2025 WL 3208284 (E.D. Cal. Nov. 17, 2025); *Cabanas v. Bondi*, 2025 WL 3171331 (S.D. Tex. Nov. 13, 2025); *Ramos v. Lyons*, 2025 LX 568700 (C.D. Cal. Nov. 12, 2025); *Oliveira v. Patterson*, 2025 WL 3095972 (W.D. La. Nov. 4, 2025); *Sandoval v. Acuna*, 2025 WL 3048926 (W.D. La. Oct. 31, 2025); *Rojas v. Olson*, 2025 WL

3033967 (E.D. Wis. Oct. 30, 2025); *Garibay-Robledo v. Noem*, 2025 WL 3264478 (N.D. Tex. Oct. 24, 2025); *Chavez v. Noem*, 2025 WL 2730228 (S.D. Cal. Sept. 24, 2025); *Pipa-Aquise v. Bondi*, 2025 WL 2490657 (E.D. Va. Aug. 5, 2025).

Admittedly, these decisions reflect the minority position. But that minority has been growing since the BIA reached its conclusion in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA Sept. 5, 2025). *See Sandoval*, 2025 WL 3048926, at *6 (noting "many of the[] cases" taking the majority position did so "before—or soon after—the BIA issued its opinion in" *Hurtado*). Courts within the Eighth Circuit have agreed with the government's arguments. *See, e.g.*, *Melgar v. Bondi, et al.*, 2025 WL 3496721 (D. Neb. Dec. 5, 2025); *Suarez v. Noem*, 2025 WL 3312168 (E.D. Mo. Nov. 28, 2025); *Mejia Olalde v. Noem*, 2025 WL 3131942 (E.D. Mo. Nov. 10, 2025); *Vargas Lopez v. Trump*, 2025 WL 2780351 (D. Neb. Sept. 30, 2025). In particular, the District of Nebraska's decision in *Melgar* comprehensively and persuasively analyzes the text of § 1225 and § 1226 before concluding that a habeas petition like the one filed in this case failed on the merits because the petitioner was properly detained under § 1225. The Federal Respondents contend that this authority justifies revisiting the Court's earlier decisions on the § 1225/1226 issue presented in this petition.

B. Mandatory Detention under § 1225

The Court should uphold Petitioner's mandatory detention under § 1225(b)(2). Petitioner does not dispute that he is a noncitizen present in the United States who entered without inspection. *See* ECF No. 1 ¶ 22. Thus, he is "deemed" to be an "applicant for admission" under § 1225(a)(1). Pursuant to the statute's "catchall provision"—paragraph

(b)(2)—a noncitizen like Petitioner who is deemed an applicant for admission and who is not subject to paragraph (b)(1) must be detained during removal proceedings. *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018). The Court should reject Petitioner's arguments for a contrary interpretation of § 1225 and § 1226, for multiple reasons that are evident from the text, context, and structure of these statutes.

First, Petitioner's argument is contrary to § 1225's plain text, which "deem[s]" people who are already "present in the United States" without admission to be applicants for admission. *See* 8 U.S.C. § 1225(a)(1). Although paragraph (b)(1) applies to those "arriving" in the United States and other more recent arrivals, paragraph (b)(2) is not so limited and applies instead to any "other" noncitizen "who is an applicant for admission." *Compare id.* § 1225(b)(1)(A)(i), *with id.* § 1225(b)(2)(A); *accord Jennings*, 583 U.S. at 287. The term "seeking admission" does not implicitly narrow this provision to just those applicants for admission who are "arriving" at the border. Such an interpretation would render paragraph (b)(2) essentially redundant of (b)(1). Rather, (b)(2) includes all people who Congress deemed to be applicants for admission who are not already covered by paragraph (b)(1).

Second, the context of § 1225's passage in a 1996 reform package shows Congress intended to place noncitizens who are present without admission on equal footing with those who are apprehended upon arrival. Before the current version of § 1225 was enacted, under the entry doctrine, inadmissible noncitizens who successfully evaded apprehension and gained entry enjoyed greater rights than those who were found inadmissible after appearing for inspection. *Torres v. Barr*, 976 F.3d 918, 928 (9th Cir. 2020) (en banc)

(explaining history of § 1225), *declined to extend by United States v. Gambino-Ruiz*, 91 F.4th 981 (9th Cir. 2024). But Congress did away with the distinction by, among other changes, deeming both categories to be treated as applicants for admission in § 1225(a) and treating them similarly in § 1225(b). Interpreting § 1225(b) to turn on physical entry rather than lawful admission after inspection would reinvigorate the entry doctrine, contrary to Congress's legislative efforts.

Third, Petitioner's approach contradicts the structure of the statute, both within § 1225 itself and between § 1225 and § 1226. Section 1225(b) divides applicants for admission between two subparagraphs: (b)(1) for those applicants for admission who are arriving, and (b)(2) for "other" applicants for admission. Section 1225(b) treats all "applicants for admission"—whether arriving or already present—as mandatory detainees under either (b)(1) or (b)(2), unlike admitted noncitizens who are subject to discretionary detention and allowed bond under § 1226.

Based on § 1225's plain text, context, and structure, the Court should hold Petitioner is properly subject to mandatory detention under § 1225(b)(2).

II. In the alternative, Petitioner is properly subject to mandatory detention pending the outcome of his asylum application under § 1225(b)(1)(B)(ii).

This case involves § 1225(b)(1) and is different from the extensive litigation over § 1225(b)(2)'s mandatory-detention framework. *E.g.*, *Rodas v. Bondi et al.*, 25-cv-3432 (JRT/LIB) ECF No. 22, Am. Mem. and Order at 15-20 (addressing Respondents' interpretation of § 1225(b)(2)). The Court should begin and end its analysis with the text of that provision paragraph (b)(1).

A. Petitioner is subject to mandatory detention under § 1225(b)(1).

Section 1225(b)(1)(A) creates an expedited removal process for noncitizens "arriving" in the United States who are found inadmissible after initial inspection. 8 U.S.C. § 1225(b)(1)(A)(i). Expedited removal in clause (i) also applies to inadmissible noncitizens "described in clause (iii)," which includes those who have been in the country less than two years, if designated by the Attorney General in her "sole and unreviewable discretion." *Id.* § 1225(b)(1)(A)(i), (iii). The Attorney General has designated all noncitizens present less than two years to be subject to "the full scope of" expedited removal under clause (i), *Designating Aliens for Expedited Removal*, 90 Fed. Reg. 8139 (Jan. 24, 2025). Put simply, any person present without admission for less than two years and who lacks valid documentation to remain is subject to the expedited removal proceedings in clause (i). *Jennings*, 583 U.S. at 287.

The only way around expedited removal under clause (i) is for asylum seekers under clause (ii). A noncitizen can invoke the asylum proceedings in clause (ii) by "indicat[ing] either an intention to apply for asylum under section 1158 of this title or a fear of persecution." 8 U.S.C. § 1225(b)(1)(A)(ii). In that case, an immigration "officer shall refer the [noncitizen] for an interview by an asylum officer under subparagraph (B)." *Id.*

Subparagraph (B), in turn, directs the conduct of the asylum proceeding. *Id.* § 1225(b)(1)(B). The asylum officer first conducts a credible-fear interview. *Id.* § 1225(b)(1)(B)(i). "If the officer determines at the time of the interview that [a noncitizen] has a credible fear of persecution (within the meaning of clause (v)), the [noncitizen] *shall be detained* for further consideration of the application for asylum." *Id.* § 1225(b)(1)(B)(ii)

(emphasis added). If the officer concludes the noncitizen "does not have a credible fear of persecution, the officer shall order the [noncitizen] removed from the United States without further hearing or review." *Id.* § 1225(b)(1)(B)(iii)(I). "Any [noncitizen] subject to the procedures under this clause *shall be detained* pending a final determination of credible fear of persecution and, if found not to have such a fear, until removed." *Id.* § 1225(b)(1)(B)(iii)(IV) (emphasis added). The plain import of this language is that any noncitizen subject to expedited removal who claims a fear of persecution upon arrival is subject to mandatory detention pending the outcome of their asylum application, whether their expressed fear of persecution is found credible or not. *See Jennings*, 583 U.S. at 287 ("Read most naturally, §§ 1225(b)(1) and (b)(2) thus mandate detention of applicants for admission until certain proceedings have concluded. . . . And neither § 1225(b)(1) nor § 1225(b)(2) says anything whatsoever about bond hearings.").

The mandatory-detention provision in § 1225(b)(1)(B)(ii) applies to Petitioner. He was apprehended by Border Patrol on the day he entered the country. (Van Der Vaart Decl. ¶ 4.) Petitioner affirmatively pled that he applied for asylum (ECF No. 1 ¶¶ 1, 3, 12, 25) and the application remains pending. (Van Der Vaart Decl. ¶¶ 5-9.) The statute therefore requires that he "shall be detained for further consideration of the application for asylum." 8 U.S.C. § 1225(b)(1)(B)(ii).[3]

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[3] Petitioner is not a member of the class in *Maldonado Bautista v. Santacruz*. The certified class in that case excludes those who are subject to detention under § 1225(b)(1). --- F.R.D. ---, No. 5:25-cv-01873, 2025 WL 3288403, at *1 (C.D. Cal. Nov. 25, 2025). As the government explained above, Petitioner is subject to detention under § 1225(b)(1) and therefore falls outside the class.

B. Petitioner's attempt to invoke § 1225(b)(2) and case law interpreting it misunderstands those authorities and the nature of his status.

Petitioner seeks to ride the wave of recent case law narrowly interpreting § 1225(b)(2), rejecting the government's broader interpretation, and entitling many immigration detainees to bond hearings under § 1226(a). *See, e.g.*, *Rodas*, 25-cv-3432, ECF No. 22 at 17, 20. Petitioner misunderstands those holdings and the nature of his status. That case law doesn't apply because he is not subject to § 1225(b)(2) or the government's contested interpretation of it.

The *Rodas* case and others like it involve the interplay between the mandatory-detention authority in § 1225(b)(2) and the discretionary-detention authority in § 1226(a). In *Rodas* and numerous other cases, the noncitizen petitioners were detained under the government's interpretation of 8 U.S.C. § 1225(b)(2), as adopted by the Board of Immigration Appeals in in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA Sept. 5, 2025). *Rodas*, 25-cv-4779, ECF No. 20 at 17 n.8. The *Hurtado* interpretation holds that a person who is present in the country without admission is an "applicant for admission" under § 1225(a)(1) and is therefore subject to mandatory detention under § 1225(b)(2)(A) and not eligible for release on bond pending the outcome of § 1229a immigration proceedings—regardless of how long the person has been present in the country. *See Hurtado*, 29 I&N Dec. at 220.

But even if the Court disagrees and finds Petitioner is a member of the class, the Court should dismiss for that reason. Petitioner cannot split his claim by availing himself of the benefits of a favorable class ruling while also seeking the benefits of individual relief in this Court.

This Court in *Rodas*, and most others[4], have rejected this interpretation, concluding that mandatory under § 1225(b) applies only to those "applicants for admission" who are also "seeking admission." *Rodas*, 25-cv-4779, ECF No. 22 at 17-18.

Petitioner here is indisputably "seeking admission" through his pending asylum claim. *See Abdi v. Klang*, 25-cv-4559 (KMM/DJF), ECF No. 16, R&R, at 4 (Dec. 31, 2025). From the moment he was apprehended in the minutes after crossing the border, Petitioner was subject to expedited removal and mandatory detention. (*See* Van Der Vaart Decl. ¶ 4); 8 U.S.C. § 1225(b)(1)(A)(i). He stayed in detention until he invoked the asylum process in § 1225(b)(1)(B) on October 30, 2024, just nine days after entering the country. (Van Der Vaart Decl. ¶ 5.)

By seeking asylum after he was first apprehended at the border—and by continuing to pursue that status to this day—Petitioner is unambiguously "seeking admission." (ECF No. 1 ¶¶ 1, 3, 12, 25.) An asylum application, if granted, entitles the asylee to "asylum status" under 8 U.S.C. § 1158(c), including a stay of removal, work authorization, and a travel document. *Id.* § 1158(c)(1). "Asylum status" is a form of lawful status that meets the

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[4] Most, but not all. A growing minority of district courts have accepted the government's interpretation of § 1225(b)(2). *See, e.g.*, *Chen v. Almodovar*, No. 1:25-cv-8350, 2025 WL 3484855 (S.D.N.Y. Dec. 4, 2025); *Cabanos v. Bondi*, No. 4:25-cv-04830, 2025 WL 3171331 (S.D. Tex. Nov. 13, 2025); *Sandoval v. Acuna*, No. 6:25-cv-01467, 2025 WL 3048926 (W.D. La. Oct. 31, 2025); *Rojas v. Olson*, No. 25-cv-1437, 2025 WL 3033967 (E.D. Wis. Oct. 30, 2025); *Garibay-Robledo v. Noem*, No. 1:25-CV-177, 2025 WL 3264478 (N.D. Tex. Oct. 24, 2025); *Vargas Lopez v. Trump*, --- F.Supp.3d ---, 2025 WL 2780351 (D. Neb. Sept. 30, 2025); *Chavez v. Noem*, No. 3:25-CV-02325, 2025 WL 2730228 (S.D. Cal. Sept. 24, 2025).

INA's definition of "admission," which means "the lawful entry . . . into the United States after inspection and authorization by an immigration officer," but which does not include parole. *Id.* § 1101(a)(13)(A), (B), 1158(d)(5).

That asylum process has never stopped and Petitioner continues to pursue lawful status to this day. (ECF No. 1 ¶¶ 1, 3, 12, 25.) He is "presently attempting to gain admission into the United States," and is therefore "seeking admission". *See Klang*, 25-cv-4559, ECF No. 16 at 4-6. Although he was paroled into the country, that act did not confer admission. 8 U.S.C. §§ 1101(a)(13)(B), 1158(d)(5); *Klang*, 25-cv-4559, ECF No. 16 at 5-6. He has not withdrawn from the asylum process, and he continues to seek legal status through the process he began over a year ago upon his entry. (*See* Van Der Vaart Decl. ¶ 4.) Mohamed is therefore like the petitioner in *Klang* and others who have successfully disclaimed any attempt at "seeking admission."

The district court in *Chen* recently considered this issue and agreed that asylum seeker was "seeking admission" under the narrower interpretation adopted by most courts. *Chen v. Almodovar*, 1:25-cv-8350, 2025 WL 348455, at *6 (S.D.N.Y. Dec. 4, 2025). The *Chen* court agreed with the government's interpretation of § 1225(b)(2) but went on to conclude that: "If actively 'seeking admission' is a distinct requirement for mandatory detention pursuant to 1225, seeking asylum *is* 'seeking admission,' [through asylum] within the meaning of the statute, since 'admission' is defined in terms of 'lawful' status, 8 U.S.C. § 1101(a)(13)(A), not physical presence on U.S. soil." *Id.* at *6.

Because Petitioner *is presently* "seeking admission" he is presently applying for asylum and is therefore "presently attempting to gain admission into the United States"—

he would be subject to § 1225(b)(2).

III. An evidentiary hearing is unnecessary.

In a habeas corpus proceeding an evidentiary hearing is necessary only where material facts are in dispute. *See Ruiz v. Norris*, 71 F.3d 1404, 1406 (8th Cir. 1995). Such is not the case here where the parties dispute a legal question – whether Mohamed should be subject to detention under 1225(b) or 1226(a). Consequently, no evidentiary hearing is necessary.

CONCLUSION

For the foregoing reasons, the Court should dismiss the petition on the merits.

Dated: January 2, 2026

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