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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO**

Daniel VENCES BELTRAN

Petitioner,

v.

Brian HENKEY, Field Office Director of Enforcement and Removal Operations, Salt Lake City Field Office, Immigration and Customs Enforcement; Kenneth PORTER, Acting Director of the Boise U.S. Immigration and Customs Enforcement Field Sub-Office; Kristi NOEM, Secretary, U.S. Department of Homeland Security; Pamela BONDI, U.S. Attorney General; Mike HOLLINSHEAD, Sheriff of Elmore County,

Respondents.

Case No. 25-733

**PETITION FOR WRIT OF HABEAS
CORPUS**

INTRODUCTION

1. Petitioner, Daniel Vences Beltran, a resident of the State of Idaho who has lived in the United States since his entry without admission as an Unaccompanied Alien Child on March 19, 2024, hereby petitions this Court for a writ of habeas corpus. On the morning

of December 30, 2025, two days after turning 18 years old, Mr. Vences was taken into custody by Immigration and Customs Enforcement (ICE).

2. He now faces unlawful detention, because the Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have concluded that aliens who entered the United States without inspection, like the Petitioner, are subject to mandatory detention without the possibility of bond.
3. DHS policy issued on July 8, 2025 instructs all Immigration and Customs Enforcement (ICE) employees to consider anyone inadmissible under § 1182(a)(6)(A)(i)—i.e., those who entered the United States without admission or inspection—to be subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.
4. Likewise, on September 5, 2025, the Board of Immigration Appeals (BIA or Board) issued a precedent decision, binding on all immigration judges, holding that an immigration judge has no authority to consider bond requests for any person who entered the United States without admission. *See Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). The Board determined that such individuals are subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.
5. Despite previous decisions from this Court, as well as those of District Courts throughout the country, the Defendants have remained intransigent, continuing to unlawfully designate noncitizens encountered here in the United States as subject to detention under 8 U.S.C. § 1225(b)(2)(A), and refusing to provide them with bond hearings, or to even make initial determinations with regard to their flight risk or danger to the community if released.

6. Where District Courts have ordered Respondents to provide bond hearings, Immigration Courts have ruled against release on the flimsiest of grounds, and where bond has been granted the Department of Homeland Security has systematically appealed those rulings, triggering automatic stays pursuant to 8 C.F.R. § 1003.19(i)(2), thwarting the due process ordered by the District Courts, and extending detention of noncitizens indefinitely. *See Carlos v. Noem*, 2:25-cv-01900-RFB-EJY (U.S. Dist. of Nev., Oct. 10, 2025); *Herrera Torralba v. Knight*, Case No. 2:25-cv-01366-RFB-DJA (U.S. Dist. of Nev., Sep. 5, 2025); *Maldonado Vazquez v. Feeley*, Case No. 25-cv-1542 RFB-EJY (U.S. Dist. of Nev., PENDING); *J.M.P. v. Arteta*, 25-cv-4987-DEH, (S.D.N.Y., October 23, 2025); *Hernandez Hernandez v. Crawford*, 1:250-cv-0156-AJT-WBP (E.D.V.A., October 16, 2025).
7. Petitioner's detention without the ability to seek bond violates the plain language of the Immigration and Nationality Act. Section 1225(b)(2)(A) does not apply to individuals like Petitioner who previously entered the country and are now residing in the United States. Instead, such individuals are subject to a different statute, section 1226(a), that allows for release on recognizance, conditional parole or bond, and review of the custody determination made by the Department of Homeland Security. That statute expressly applies to people who, like Petitioner, are charged as inadmissible for having entered the United States without inspection.
8. Respondents' legal interpretation is plainly contrary to the statutory framework and contrary to decades of agency practice applying § 1226(a) to people like Petitioner, as this honorable Court has recently ruled. *See Perez Camacho v. Hollinshead*, 1-25-cv-593-BLW (US Dist. of Idaho, Nov. 19, 2025); *Estrada Elias v. Knight*, 1-25-cv-594-BLW

(US Dist. of Idaho, Nov. 19, 2025); *Ortega Casarez v. Thompson*, 1-25-cv-596-BLW (US Dist. of Idaho, Nov. 19, 2025); *Esparza Ibarra v. Knight*, 1-25-cv-597-BLW; 1-25-cv-597-BLW (US Dist. of Idaho, Nov. 19, 2025); *Torres Esparza v. Hollinshead*, 1-25-cv-599-BLW (US Dist. of Idaho, Nov. 19, 2025); *Villafana Rodriguez v. Knight*, 1-25-cv-600-BLW (US Dist. of Idaho, Nov. 19, 2025); *Cordero Esparza v. Knight*, 1-25-cv-601-BLW (US Dist. of Idaho, Nov. 19, 2025); *Ortiz Gonzalez v. Knight*, 1-25-cv-602-BLW (US Dist. of Idaho, Nov. 19, 2025); *Estrada Elias v. Knight*, 1-25-cv-604-BLW (US Dist. of Idaho, Nov. 19, 2025); *Quijada Cordoba v. Knight*, 1-25-cv-605-BLW (US Dist. of Idaho, Nov. 19, 2025); *Jimenez Rangel v. Knight*, 1-25-cv-607-BLW (US Dist. of Idaho, Nov. 19, 2025); *Rodriguez Arredondo v. Hollinshead*, 1-25-cv-609-BLW (US Dist. of Idaho, Nov. 19, 2025); *Martinez Martinez v. Knight*, 1-25-cv-610-BLW (US Dist. of Idaho, Nov. 19, 2025); *Verdugo Lopez v. Anderson*, 1-25-cv-621-BLW (US Dist. of Idaho, Nov. 19, 2025); and, *Duran Serrato v. Anderson*, 1-25-cv-603-BLW (US Dist. of Idaho, Nov. 19, 2025).

9. Furthermore, Respondents' position is violative of the Order of the District Court for the Central District of California in *Maldonado Bautista v. Santa Cruz*, No. 5:2025-cv-01873 (C.D. Cal 2025), which certified a nationwide class of persons improperly designated as detained under 1225(b)(2), declared the members of the class eligible for release, and vacated the DHS policy of July 8, 2025 which set forth this unlawful detention scheme.
10. Petitioner asks the Court to issue a writ of habeas corpus finding that his detention is not justified because the government has not determined that he presents a risk of flight or danger in light of available alternatives to detention, and to order his immediate release. In the alternative, Respondent asks the Court to issue a writ of habeas corpus and order

his release within 7 days unless Respondents schedule a bond hearing before an immigration judge, wherein they will bear the burden to demonstrate that he is a danger to the community or a flight risk to justify continued detention, and enjoining Defendants from seeking to stay his release through appeal pursuant to 8 C.F.R. § 1003.19.

11. Pending adjudication of this action, the Petitioner asks the Court to restrain Respondents from transporting the Petitioner outside of the State of Idaho, or from seeking to obtain any waiver of Petitioner's rights in removal proceedings or in this action outside the presence of his attorney.

JURISDICTION AND VENUE

12. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*
13. This Court has subject matter jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).
14. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et. seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.
15. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493- 500 (1973), venue lies in the United States District Court for the District of Idaho, because Petitioner is detained at the Elmore County Detention Center in Mountain Home, Idaho, which is within the jurisdiction of this District. 28 U.S.C. § 1391(b); *see also* 28 U.S.C. § 2241(d); *Palma v. Holder*, 2014 U.S. Dist. LEXIS 175721 (9th Cir. 2014).

REQUIREMENTS OF 28 U.S.C. § 2243

16. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return “within *three days* unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.* (emphasis added).
17. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). “The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and receives prompt action from him within the four corners of the application.” *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

PARTIES

18. Petitioner is a national of Mexico who has lived in the United States since 2024. Petitioner is currently detained at the Elmore County Detention Center in Mountain Home, Idaho, and is a resident of Nampa, Idaho. He is in the custody, and under the direct control, of Respondents and their agents.
19. Respondent, Mike Hollinshead, is the Sheriff of Elmore County, and he has immediate physical custody of Petitioner pursuant to the Elmore County detention facility’s contract with U.S. Immigration and Customs Enforcement to detain noncitizens and is a legal custodian of Petitioner

20. Respondent, Kenneth Porter, is sued in his official capacity as the Director of the Boise Field Office of U.S. Immigration and Customs Enforcement. Respondent is a legal custodian of Petitioner and has authority to release him.
21. Respondent, Brian Henkey, is sued in his official capacity as the Director of the Salt Lake City Field Office of U.S. Immigration and Customs Enforcement. Respondent is a legal custodian of Petitioner and has authority to release him.
22. Respondent Kristi Noem is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security (DHS). In this capacity, Respondent Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees U.S. Immigration and Customs Enforcement, the component agency responsible for Petitioner's detention. Respondent Noem is a legal custodian of Petitioner.
23. Respondent Pam Bondi is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that capacity, she has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review (EOIR), which administers the immigration courts and the BIA. Respondent Bondi is empowered to order the Petitioner's release from custody, as well as to provide him with a bond hearing.

STATEMENT OF FACTS

24. Petitioner is an 18-year-old native and citizen of Mexico, who has resided in the United States since entering the country as an Unaccompanied Alien Child.
25. After his entry, the Respondent was taken into custody by the Department of Homeland Security. As an Unaccompanied Alien Child, his detention was governed by the section

235 of the William Wilberforce Trafficking Victims Protection Reauthorization Act (TVPRA). 8 U.S.C. § 1232. Having been found to have been the victim of a severe form of human trafficking, he was placed under the care of the Department of Health and Human Services, and subsequently released into the custody of his uncle.

26. On December 28, 2025, his 18th birthday, Petitioner was arrested at work by the Canyon County Sheriff's Office on suspicion of a violation of juvenile probation. Charges in that case were dismissed at his first hearing, however, days later, he was taken into custody by ICE, who had filed a detainer with the Canyon County Sheriff's Office.
27. He is currently being held at the Elmore County Jail, in Mountain Home, Idaho, at the behest of ICE; however, his transfer out of the jurisdiction to a detention center is expected imminently.
28. He has a hearing on his removability scheduled in February of 2026, before the Portland Immigration Court.
29. ICE officials have indicated they do not intend to release Petitioner from their custody.
30. Prior to the ruling in *Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025), individuals like Petitioner were regularly released on bond or on their own recognizance, while waiting for their hearing.

LEGAL FRAMEWORK

31. The Supreme Court has stated that it “‘is well established the Fifth Amendment entitles aliens to due process of law in deportation proceedings.’” *Demore v. Kim*, 538 U.S. 510, 523 (2003) (quoting *Reno v. Flores*, 507 U.S. 292, 306 (1993)). “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); *see also id.* at 718 (Kennedy, J., dissenting) (“Liberty under the Due Process Clause includes protection against unlawful or arbitrary personal restraint or detention.”). This fundamental due process protection applies to all noncitizens, including both removable and inadmissible noncitizens. *See id.* at 721 (Kennedy, J., dissenting) (“both removable and inadmissible aliens are entitled to be free from detention that is arbitrary or capricious”).

32. Due process therefore requires “adequate procedural protections” to ensure that the government’s asserted justification for physical confinement “outweighs the individual’s constitutionally protected interest in avoiding physical restraint.” *Id.* at 690 (internal quotation marks omitted). In the immigration context, the Supreme Court has recognized only two valid purposes for civil detention—to mitigate the risks of danger to the community and to prevent flight. *Id.*; *Demore*, 538 U.S. at 528.
33. The INA prescribes three basic forms of detention for noncitizens in removal proceedings.
34. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard non-expedited removal proceedings before an IJ. *See* 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention, *see* 8 U.S.C. § 1226(c).
35. Second, the INA provides for mandatory detention of noncitizens subject to expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission referred to under § 1225(b)(2).
36. Last, the Act also provides for detention of those who have been previously ordered removed. *See* 8 U.S.C. § 1231(a)-(b).

37. This case concerns detention provisions at §§ 1226(a) and 1225(b)(2).
38. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No. 104–208, Div. C, §§ 302–03, 110 Stat. 3009–546, 3009–582 to 3009–583, 3009–585. Section 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No.119-1, 139 Stat. 3 (2025).
39. Following enactment of the IIRIRA, EOIR drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225 and that they were instead detained under § 1226(a). See Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).
40. Thus, in the decades that followed, most people who entered without inspection— unless they were subject to some other detention authority—received bond hearings. That practice was consistent with many more decades of prior practice, in which noncitizens who were not deemed “arriving” were entitled to a custody hearing before an IJ or other hearing officer. See 8 U.S.C. § 1252(a) (1994); see also H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply “restates” the detention authority previously found at § 1252(a)).
41. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new policy that rejected well-established understanding of the statutory framework and reversed decades of practice.
42. The new policy, entitled “Interim Guidance Regarding Detention Authority for Applicants

for Admission,”¹ claims that all persons who entered the United States without inspection shall now be subject to mandatory detention provision under § 1225(b)(2)(A). The policy applies regardless of when a person is apprehended, and affects those who have resided in the United States for months, years, and even decades

43. On September 5, 2025, the BIA adopted this same position in a published decision, *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). There, the Board held that all noncitizens who entered the United States without admission or parole are subject to detention under § 1225(b)(2)(A) and are ineligible for IJ bond hearings.
44. Even before ICE or the BIA introduced these nationwide policies, IJs in the Tacoma, Washington, immigration court stopped providing bond hearings for persons who entered the United States without inspection and who have since resided here. There, the U.S. District Court in the Western District of Washington found that such a reading of the INA is likely unlawful and that § 1226(a), not § 1225(b), applies to noncitizens who are not apprehended upon arrival to the United States. *Rodriguez Vazquez v. Bostock*, 779 F. Supp. 3d 1239 (W.D. Wash. 2025).
45. Subsequently, court after court has adopted the same reading of the INA’s detention authorities and rejected ICE and EOIR’s new interpretation. *See, e.g., Gomes v. Hyde*, No. 1:25-CV-11571-JEK, 2025 WL 1869299 (D. Mass. July 7, 2025); *Diaz Martinez v. Hyde*, No. CV 25-11613-BEM, --- F. Supp. 3d ---, 2025 WL 2084238 (D. Mass. July 24, 2025); *Rosado v. Figueroa*, No. CV 25-02157 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), *report and recommendation adopted*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025); *Lopez Benitez v. Francis*, No. 25

¹ Available at <https://www.aila.org/library/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission>.

CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13, 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025 WL 2374411 (D. Minn. Aug. 15, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-cv-01789-ODW (DFMx), 2025 WL 2379285 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM, 2025 WL 2403827 (D. Mass. Aug. 19, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug. 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF, 2025 WL 2419263 (N.D. Cal. Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La. Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051 (ECT/DJF), --- F. Supp. 3d ----, 2025 WL 2466670 (D. Minn. Aug. 27, 2025) *Lopez-Campos v. Raycraft*, No. 2:25-cv-12486-BRM-EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Vasquez Garcia v. Noem*, No. 25-cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Zaragoza Mosqueda v. Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); *Pizarro Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025); *Sampiao v. Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass. Sept. 9, 2025); *see also, e.g., Palma Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566, at *2 (D. Neb. Sept. 3, 2025) (noting that “[t]he Court tends to agree” that § 1226(a) and not § 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL 2402271 at *3 (D. Neb. Aug. 19, 2025) (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-RCC, 2025 WL 2374224 at *2 (D. Neb. Aug. 14, 2025) (same). *See also* US District of Idaho cases cited *supra*, para. 8, pp. 4-5.

46. Courts have uniformly rejected DHS's and EOIR's new interpretation because it defies the INA. As the *Rodriguez Vazquez* court and others have explained, the plain text of the statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to people like Petitioner.
47. Section 1226(a) applies by default to all persons "pending a decision on whether the [noncitizen] is to be removed from the United States." These removal hearings are held under § 1229a, which "decid[e] the inadmissibility or deportability of a[] [noncitizen]."
48. The text of § 1226 also explicitly applies to people charged as being inadmissible, including those who entered without inspection. See 8 U.S.C. § 1226(c)(1)(E). Subparagraph (E)'s reference to such people makes clear that, by default, such people are afforded a bond hearing under subsection (a). As the *Rodriguez Vazquez* court explained, "[w]hen Congress creates 'specific exceptions' to a statute's applicability, it 'proves' that absent those exceptions, the statute generally applies." *Rodriguez Vazquez*, 779 F. Supp. 3d at 1257 (citing *Shady Grove Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)); see also *Gomes*, 2025 WL 1869299, at *7.
49. Section 1226 therefore leaves no doubt that it applies to people who face charges of being inadmissible to the United States, including those who are present without admission or parole.
50. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently entered the United States. The statute's entire framework is premised on inspections at the border of people who are "seeking admission" to the United States. 8 U.S.C. § 1225(b)(2)(A).

51. Accordingly, the mandatory detention provision of § 1225(b)(2)(A) does not apply to people like Petitioner, who have already entered and were residing in the United States at the time they were detained.

CLAIMS FOR RELIEF

COUNT ONE

52. Petitioner incorporates by reference the allegations of fact set forth in the preceding paragraphs.
53. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. As relevant here, it does not apply to those who previously entered the country under the TVPRA and who have been residing in the United States prior to being apprehended and placed in removal proceedings by Respondents. Such noncitizens are detained under § 1226(a), unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.
54. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued detention and violates the INA.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Stay Petitioner's transportation to another jurisdiction until this Court resolves his petition for a writ of habeas corpus;
- (3) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.

- (4) Declare that denial of Petitioner's detention under 8 U.S.C. § 1225(b) denies him his statutory rights under 8 U.S.C. § 1226(a).
- (5) Declare that Petitioner's detention is unlawful.
- (6) Issue a writ of habeas corpus ordering Respondents to release Petitioner immediately; or, in the alternative, issue an order requiring Respondents to schedule a bond hearing within 7 days, wherein they will bear the burden to demonstrate by clear and convincing evidence that he is a danger to the community or a flight risk, to justify his continued detention, and enjoining Respondents from staying his release from custody by operation of 8 C.F.R. § 1003.19(i).
- (7) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
- (8) Grant any further relief this Court deems just and proper.

Respectfully submitted,

/s/ Jacob C. Rourk

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Dated: December 31, 2025

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Daniel Vences Beltran, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 31st day of December, 2025.

s/Jacob C. Rourk
Jacob C. Rourk