

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Civil No. 26-cv-0343-KMM-ECW

Belizario Rodolfo Vasquez Zacarias,

Petitioner,

v.

**FEDERAL RESPONDENTS’  
RESPONSE TO PETITION FOR  
WRIT OF HABEAS CORPUS**

Pamela Bondi, *et al.*,

Respondents.

Petitioner filed this petition for a writ of habeas corpus to secure a bond hearing in connection with Petitioner’s detention by the U.S. Immigration and Customs Enforcement. This petition raises legal and factual issues similar to those in prior habeas petitions this Court has decided. Those issues are currently before the Eighth Circuit on expedited review in *Avila v. Bondi*, No. 25-3248 (8th Cir. docketed Nov. 10, 2025). For purposes of expediting these proceedings, the Federal Respondents assert all arguments raised by the government in *Avila*, preserve those arguments for any appeal in this case, and respectfully request that the Court deny Petitioner’s habeas petition. The Government made ICE aware of the Order enjoining the Government from removing Petitioner from the State of Minnesota. ICE communicated to the Government this Petitioner is scheduled for a flight to be returned to the State of Minnesota on 18 January 2026. The Government will update this Court within 72 hours with confirmation of Petitioner return to the State of Minnesota.

Dated: January 17, 2026

DANIEL N. ROSEN  
United States Attorney

s/ J. Cruz Rodriguez

BY: J. Cruz Rodriguez

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