

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 26-cv-00186-CYC

ENRIQUE CASTRO DE SANTIAGO,

Petitioner,

v.

KRISTI NOEM, United States Secretary, Department of Homeland Security,
TODD M. LYONS, Acting Director, United States Immigration and Customs
Enforcement (ICE),
MARCOS CHARLES, Acting Executive Associate Director, ICE Enforcement and
Removal Operations,
ROBERT G. HAGAN, ICE Denver Field Office Director,
JUAN BALTASAR, Warden, GEO-ICE immigration detention facility in Aurora, CO, and
PAMELA BONDI, United States Attorney General,

Respondents.

**NOTICE OF POSITION ON PETITIONER'S MOTION TO SUPPLEMENT
WRIT OF HABEAS CORPUS (ECF No. 9)**

Pursuant the Court's order, ECF No. 10, Respondents file this notice giving their position on Petitioner's motion to supplement writ of habeas corpus, ECF No. 9.

Petitioner asserts that the purpose of the motion is to add "new facts and supplemental authority" to his habeas petition. *Id.* at 1.

Respondents do not oppose the motion. To the extent the facts asserted in Petitioner's motion to supplement differ from the facts asserted in the petition itself, Respondents will direct their briefing to the facts asserted in the motion to supplement.

Dated: February 2, 2026

PETER MCNEILLY
United States Attorney

s/ Brad Leneis
Brad Leneis
Assistant United States Attorney
1801 California Street, Suite 1600
Denver, Colorado 80202
Telephone: (303) 454-0181
Fax: (303) 454-0411
Email: brad.leneis2@usdoj.gov

Attorney for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2026, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/ Brad Leneis
Brad Leneis
U.S. Attorney's Office