UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION

LUIS ENCALADA LOJA
(A No.

Petitioner,

v.

PAMELA BONDI, U.S. Attorney General;

KRISTI NOEM, Secretary of the U.S. Department of Homeland Security;

TODD M. LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement;

KIRSTEN SULLIVAN, in her official capacity as Field Office Director of Atlanta Field Office, U.S. Immigration and Customs Enforcement; and

MICHAEL BRECKON, in his official capacity as warden of the Folkston ICE Processing Center

Respondents.

Case No. CV 526-081

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. Petitioner, Luis Encalada Loja, a native and citizen of Ecuador, petitions this Court for a Writ of Habeas under 28 U.S.C. § 2241 to challenge his continued custodial detention by the United States Department of Homeland Security, through its component arm, U.S. Immigration and Customs Enforcement ("ICE").

2. On December 31, 2025, an Immigration Judge sitting in the Hyattsville (Maryland) Immigration Court dismissed the removal proceedings against Mr. Encalada Loja due the Department of Homeland Security's failure to prosecute the case. Despite the absence of any charges against him, immigration officials continue to detain Mr. Encalada Loja. *See* Exhibit A (January 15, 2026, Order of the Immigration Judge).

3. On January 15, 2026, an Immigration Judge sitting in the Atlanta Immigration Court denied Mr. Encalada Loja's request for a bond and custody redetermination hearing, finding a lack of jurisdiction under *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).

4. Mr. Encalada Loja's continued detention by Respondents without any mechanism to challenge his unlawful confinement violates the Due Process Clause of the Fifth Amendment to the United States Constitution and presents a federal question under 28 U.S.C. § 1331 though the Immigration and Nationality Act ("INA"), (8 U.S.C. § 1101 *et seq*.). Respondent seeks declaratory and injunctive relief under 28 U.S.C. § 1331 in conjunction with 28 U.S.C. § 2201, in the form of an order from this Court requiring his immediate release or, alternatively, a bond hearing before a neutral and impartial immigration judge.

JURISDICTION AND VENUE

5. Mr. Encalada Loja is detained in the Folkston ICE Processing Center in Folkston, Georgia, which is within the jurisdiction of the United States District Court for the Southern District of Georgia.

6. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 ("habeas corpus"), 28 U.S.C. § 1651 ("All Writs Act"), 28 U.S.C. § 1331 ("federal question"), the INA, and U.S. CONST. amend. V (the "Due Process Clause").

7. This Court has jurisdiction to adjudicate habeas corpus claims brought by foreign nationals who challenge the legality of their detention by U.S. immigration officials. *See Reno v. Flores*, 507 U.S. 292, 307 (1993) ("It is well established that the Fifth Amendment entitles aliens to due process of law in deportation proceedings."); *see also Djadju v. Vega*, 32 F.4th 1102, 1105-06 (11th Cir. 2022) ("Although our jurisdiction to consider challenges under § 2241 to an alien's detention is limited, we have jurisdiction to address a challenge to the legal basis of the detention, including constitutional challenges.") (citing *Madu v. U.S. Att'y Gen.*, 470 F.3d 1362, 1368 (11th Cir. 2006)).

8. Title 8 U.S.C. § 1252(g) does not operate as a jurisdictional bar because that statute does not apply to actions taken to detain foreign nationals. *See Reno v. American-Arab Anti-Discrimination Comm.*, 525 U.S. 471, 482 (1999) ("Section 1252(g) 'applies only to three discrete actions,' i.e. commencement of removal proceedings, adjudication of removal cases, and execution of removal orders").

9. Title 8 U.S.C. § 1252(b)(9), does not preclude jurisdiction because that statute applies to review of removal orders and not to detention decisions made prior to the issuance of a removal order. *See Demore v. Kim*, 538 U.S. 510, 517 (2003) ("'where Congress intends to preclude judicial review of constitutional claims its intent to do so must be clear.'") (quoting *Webster v. Doe*, 486 U.S. 592, 603 (1988)).

EXHAUSTION

10. A petitioner seeking habeas corpus under 28 U.S.C. § 2241 need not exhaust administrative remedies because the statute does not require exhaustion. *Compare* 28 U.S.C. § 2241 *with* 28 U.S.C. § 2254(b)(1)(A); *see McCarthy v. Madigan*, 503 U.S. 140, 144 (1992) ("where Congress has not clearly required exhaustion, sound judicial discretion governs.") (citation omitted); *Stephens v. Lindsey*, 304 F. Supp. 203, 205 (S.D. Ga. 1969) (holding that failure to exhaust did not deprive the court of jurisdiction to adjudicate a habeas corpus petition under 28 U.S.C. § 2241).

11. Assuming the existence of an exhaustion requirement, Mr. Encalada Loja exhausted administrative remedies. He requested a custody and bond redetermination hearing before the Immigration Court. On January 15, 2026, an immigration judge declined to consider his request, citing *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025), to find that he lacked authority to do so. *See* Exhibit A.

12. The usual method of exhaustion through the Board of Immigration Appeals ("the Board") would be futile as it is extremely unlikely that the Board will reverse the decision that it issued in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). "A district court may excuse the failure to exhaust if resorting to an available administrative scheme would be futile or the remedy inadequate . . . or where a claimant is denied meaningful access to the administrative review scheme in place." *Bolton v. Inland Fresh Seafood Corp. of Am., Inc.*, 155 F.4th 1272, 1282 (11th Cir. 2025) (internal quotations omitted) (alteration in original). The Court should therefore waive the prudential exhaustion requirement.

REQUIREMENTS OF 28 U.S.C. § 2243

13. The Court should grant the petition for writ of habeas corpus or issue an order to show cause to the Respondents forthwith, unless Mr. Encalada Loja is not entitled to relief. *See* 28 U.S.C. § 2243. If an order to show cause is issued, the Court should require respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

PARTIES

14. Mr. Encalada Loja is a native and citizen of Ecuador and is now detained by Respondents at the Folkston ICE Processing Center in Folkston, Georgia. He is in custody and under the direct control of Respondents and their agents.

15. Respondent Michael Breckon is sued in his official capacity as the Warden of the Folkston ICE Processing Center in Folkston, Georgia. Respondent Breckon has immediate physical custody of Mr. Encalada Loja and has the authority to release him from custody.

16. Respondent Kristen Sullivan is sued in her official capacity as Field Office Director of the Georgia Field Office, U.S. Immigration and Customs Enforcement and supervises and oversees Respondent Breckon.

17. Respondent Todd M. Lyons is sued in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement and supervises and oversees Respondent Sullivan.

18. Respondent Kristi Noem is sued in her official capacity as the Secretary of the Department of Homeland Security. In this capacity, Respondent Kristi Noem is responsible for the implementation and enforcement of the INA, and oversees ICE, the

component agency directly responsible for Mr. Encalada Loja's detention. *See* 8 U.S.C. § 1103(a). Respondent Kristi Noem is a legal custodian of Petitioner.

19. Respondent Pamela Bondi is sued in her official capacity as the Attorney General of the United States. The Attorney General oversees the Executive Office for Immigration Review and, within the Executive Branch, is the arbiter of all questions of law pertaining to the Immigration and Nationality Act. *See* 8 U.S.C. § 1103(a)(1), 1103(g).

STATEMENT OF FACTS

20. Mr. Encalada Loja is a native and citizen of Ecuador. He entered the United States on or about 2005, without inspection, admission, or parole by in immigration officer.

21. Mr. Encalada Loja had no interaction with U.S. immigration officials until December 4, 2025, when immigration officers stopped him in Maryland while he was driving his work van. It is not clear why the officers stopped the vehicle or how immigration officers had reasonable suspicion to do so. *See United States v. Brignoni-Ponce*, 422 U.S. 873, 884 (1975) (to stop an individual for brief questioning about immigration status, the Government must have reasonable suspicion that the individual is illegally present in the United States).

22. On information and belief, immigration officers served Mr. Encalada Loja with a Notice to Appear ("NTA") that same day. The NTA is used to initiate removal proceedings against a foreign national. *See* 8 U.S.C. § 1229.

23. On December 31, 2025, an Immigration Judge sitting in the Hyattsville Immigration Court dismissed Mr. Encalada Loja's removal case due to the Department of Homeland Security's failure to prosecute the case. *See* Exhibit B (Immigration Court System Showing that Mr. Encalada Loja's Case was Closed Due to a Failure to Prosecute). This

happens most commonly when the Department of Homeland Security fails to file the NTA with the immigration court.

24. Mr. Encalada Loja has been in immigration custody since approximately December 4, 2025. He does not currently have charges pending against him in Immigration Court.

CLAIMS FOR RELIEF

COUNT ONE

Violation of the Immigration and Nationality Act, 8 U.S.C. §§ 1225(b) and 1226(a)

25. Mr. Encalada Loja incorporates and realleges all paragraphs as if fully set forth here.

26. The Court should order Respondents to release Mr. Encalada Loja from their custody immediately because there are no charges pending against him. Assuming there were charges pending against him, Mr. Encalada Loja would be entitled to release from confinement or, at a minimum, a bond hearing conducted by a neutral and impartial adjudicator in accordance with 8 U.S.C. § 1226(a).

27. The Respondents' theory that Mr. Encalada Loja is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A) rests on the mistaken recent reinterpretation of the INA's detention provisions at 8 U.S.C. §§ 1225(b) and 1226(a). Several reasons demonstrate the incorrectness of the Respondents' reinterpretation of these statutes.

28. First, the plain language of the INA's pre-removal order detention statutes dictate that Mr. Encalada Loja is not properly detained under § 1225(b)(2). Section 1225(b)(2) "applies where an arriving alien is 'seeking admission' into the United States, and that provision mandates detention for aliens who are 'applicants for admission.'" *Antonio Aguirre Villa v. Normand*, 2025 U.S. Dist. LEXIS 217348, at *13 (S.D. Ga. Nov. 4, 2025) (quoting 8 U.S.C. § 1225(b)(2)(A)). Mr. Encalada Loja entered the United States in 2005. He cannot be said to be "arriving," nor can he be said to be "seeking" admission.

See id. at *18 ("The expression 'alien seeking admission' plainly describes individual taking some action, and, given the placement in the statute, that action would likely occur at the border upon inspection.") (citations omitted).

29. This understanding of § 1225(b) is consistent with *Jennings v. Rodriguez*, where the Supreme Court instructed that 8 U.S.C. § 1225(b) "applies primarily to aliens seeking entry into the United States ('applicants for admission' in the language of the statute)." 583 U.S. 281, 297 (2018).

30. In contrast, section 1226 has historically "authorize[d] the Government to detain certain aliens *already in the country* pending the outcome of removal proceedings[.]" *Jennings*, 583 U.S. at 289 (emphasis and alteration added). "Section 1226(a) creates a default rule for those aliens by permitting—but not requiring—the Attorney General to issue warrants for their arrest and detention pending removal proceedings." *Id.* at 303. "Section 1226(a) also permits the Attorney General to release those aliens on bond . . ." *Id.*

31. In short, the plain language of the statute makes clear that (assuming any charges were pending against Mr. Encalada Loja) the Respondents' detention authority would fall under § 1226(a). *See Jennings*, 583 U.S. at 289.

32. Second, the Respondents' reinterpretation of §§ 1225(b)(2)(A) and 1226(a) is contrary to the recent legislative history of the INA. It is settled that a "statute should be construed so that effect is given to all its provisions, so that no part will be inoperative or superfluous, void or insignificant . . . ." *Hibbs v. Winn*, 542 U.S. 88, 101 (2004) (internal quotations omitted)). In January 2025, Congress passed the Laken Riley Act, "amending § 1226(c) to add a category of noncitizens subject to mandatory detention." *Aguirre Villa*, 2025 U.S. Dist. LEXIS 217348, at *24 (citing Laken Riley Act, Pub. L. No. 119-1, 139 Stat. 3

(2025)). "This category includes noncitizens who are (1) inadmissible under §§ 1182(6)(A), (6)(C), or (7)(A), and (2) that have been charged with 'burglary, theft, larceny, shoplifting or assault of a law enforcement officer offense, or any crime that results in death or serious bodily injury to another person.'" *Id.* (quoting 8 U.S.C. § 1226(c)(1)(E)(ii)). If § 1225(b) already required mandatory detention of all noncitizens who have not been admitted, these provisions of the Laken Riley Act would be "meaningless." *Id.*

33. Third, the Respondents' reinterpretation of the detention provisions "would upend decades of practice. Indeed, mandatory detention for all applicants has only been the official policy of the Department of Homeland Security ("DHS") . . . since July 8, 2025, when Acting Director of U.S. Immigration and Customs Enforcement, Todd M. Lyons, issued an internal memorandum explaining that the agency had revisited its legal position." *Martinez v. Hyde*, 792 F. Supp. 3d 211, 217-218 (D. Mass. 2025) (internal quotation omitted); *see Paz v. Walker*, 2026 U.S. Dist. LEXIS 5154, at *2 (S.D. Fla. Jan. 12, 2026) (same). The Respondents' nearly three-decade interpretation of the INA's detention provisions should inform the Court as to the correctness of that interpretation. *See Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 386 (2024).

34. The novelty of the Respondents' new theory of immigration detention is underscored by the conflicting pronouncements of it by the Respondents themselves. In an August 4, 2025, order, the Attorney General determined that foreign nationals arrested in the interior of the United States (other than at a port of entry) are entitled to bond hearings and are detained under 8 U.S.C. § 1226. She did this by designating as precedent "in all

proceedings involving the same or similar issues" the Board's decision in *Matter of Akhmedov*, 29 I. & N. Dec. 166 n.1 (BIA 2025).

35. In *Akhmedov*, the Board considered the Department of Homeland Security's appeal of an Immigration Judge's grant of bond to a foreign national arrested in the interior of the United States. *See* 29 I. & N. Dec. at 166, 168. The Board's decision - as adopted by the Attorney General – could hardly be clearer: "The respondent's custody determination is governed by the provisions of section 236(a) of the Immigration and Nationality Act, 8 U.S.C. § 1226(a) (2018)." *Id.* at 166.

36. Just like the foreign national in *Matter of Akhmedov*, Mr. Encalada Loja was arrested by immigration officers in the interior of the United States. Just like the foreign national in *Matter of Akhmedov*, Mr. Encalada Loja is, at a minimum, entitled to a bond hearing.

37. By statute, the Attorney General's determinations and rulings on all questions of law pertaining to the Immigration and Nationality Act bind the Executive Branch. *See* 8 U.S.C. § 1103(a)(1); see also 8 C.F.R. § 1003.1(d)(1)(i) ("The Board shall be governed by the provisions and limitations prescribed by applicable law, regulations, and procedures, and by decisions of the Attorney General (through review of a decision of the Board, by written order, or by determination and ruling pursuant to section 103 of the Act)."

38. Approximately one month after the Attorney General ordered that *Akhmedov* is binding, the Board of Immigration Appeals issued its decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). In that case, the Board determined that a foreign national who has not been admitted to the United States is not entitled to a bond hearing and is detained under 8 U.S.C. § 1225(b)(2)(A). *See id.* at 220. *Yajure Hurtado* cannot be

reconciled with the Attorney General's decision in *Akhmedov* (decided a month earlier) where the Attorney General determined that 8 U.S.C. § 1226(a) governs foreign nationals who enter the United States unlawfully and who immigration officers later encounter. *See Matter of Akhmedov*, 29 I. & N. Dec. at 166.

COUNT TWO

Violation of Fifth Amendment Right to Substantive Due Process
Detention without Charges

39. Mr. Encalada Loja incorporates and realleges paragraphs 1-38 as if fully set forth here.

40. It is settled that the Fifth Amendment's Due Process Clause applies to all "persons" within the United States. *See Matthews v. Diaz*, 426 U.S. 67, 77 (1976). The guarantee of substantive due process includes "aliens, whether their presence here is lawful, unlawful, temporary, or permanent.") *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001) (citations omitted).

41. It is equally well settled that freedom from confinement is a core liberty interest and violation of that liberty interest raises a colorable substantive due process claim. S*ee, e.g.*, *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)); *Reno v. Flores*, 507 U.S. 292, 301 (1993) (collecting cases); *see also Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004) (bodily freedom is the "most elemental of liberty interests")."

42. "[G]overnment detention violates th[e Due Process] Clause unless the detention is ordered in a *criminal* proceeding with adequate procedural protections or, in certain special and 'narrow' nonpunitive 'circumstances' where a special justification . . . outweighs the 'individual's constitutionally protected interest in avoiding physical

restraint." *Zadvydas*, 533 U.S. at 690 (emphasis in original) (quoting *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)).

43. Immigration officials have detained Mr. Encalada Loja *without charges* since the Immigration Judge dismissed the case against him on December 31, 2025. The Court should grant the Habeas Corpus Petition and order Mr. Encalda Loja's immediate release because the Respondents are engaged in an ongoing violation of his right to substantive due process.

COUNT THREE

Violation of Fifth Amendment Right to Procedural Due Process

44. Mr. Encalada Loja incorporates and realleges paragraphs 1-43 as if fully set forth here.

45. Mr. Encalada Loja also has a right to procedural due process. Immigration proceedings are civil and they are intended to be "nonpunitive in purpose and effect." *Zadvydas*, 533 U.S. at 690. Over a century of Supreme Court precedent instructs that the Fifth Amendment entitles foreign nationals to procedural due process. *See Reno*, 507 U.S. at 306 (citing *The Japanese Immigrant Case*, 189 U.S. 86, (1903).

46. "To determine whether detention violates procedural due process rights, courts apply the three-part test articulated in *Mathews v. Eldridge*, 424 U.S. 319 (1976)." *Merino v. Ripa*, 2025 U.S. Dist. LEXIS 206662, at *11 (S.D. Fl. Oct. 15, 2025). "Under Mathews, courts weigh the following three factors: (1) 'the private interest that will be affected by the official action'; (2) 'the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards'; and (3) 'the Government's interest, including the function involved and the

fiscal and administrative burdens that the additional or substitute procedural requirement would entail.'" *Id.* (quoting *Mathews*, 424 U.S. at 335).

47. First, Mr. Encalada Loja invokes "the most elemental of liberty interests – the interest in being free from physical detention . . ." *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004).

48. Second, the risk of erroneously depriving Mr. Encalada Loja of his freedom is high because an immigration judge denied his bond and custody redetermination request pursuant to *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025). Further, and as discussed *infra*, there are no charges pending against him.

49. Third, the Respondents have no interest in detaining an individual without charges. But even if they had charged Mr. Encalada Loja, any government interest would be protected by the individualized determination by an immigration judge whether he should be granted bond under § 1226. *See Merino v. Ripa*, 2025 U.S. Dist. LEXIS 206662 at *13 (S.D. Fl. (Oct. 15, 2025) (citing *Hernandez v. Sessions*, 872 F.3d 976, 994 (9th Cir. 2017) ("the government has no legitimate interest in detaining individuals who have been determined not to be a danger to the community and whose appearance at future immigration proceedings can be reasonably ensured by a lesser bond or alternative conditions."). The Respondents' refusal to release an individual with no charges pending against him creates a near-certain risk that Mr. Encalada Loja will be deprived of his interest in being free from unlawful detention.

50. In Mr. Encalada Loja's case, all three *Mathews* factors weigh heavily in favor of holding that the Respondents' refusal to provide him with any process whatsoever violates his right to procedural due process. The Court should grant the petition for a Writ of Habeas Corpus for this reason as well.

COUNT FOUR

Mr. Encalada Loja is a *Maldonada Bautista* Class Member

51. Mr. Encalada Loja incorporates and realleges paragraphs 1-50 as if fully set forth here.

52. In *Maldonado Bautista v. Santacruz*, No. 5:25-cv-01873-SSS-BFM (C.D. Cal.), the United States District Court for the Central District of California certified a nationwide class of noncitizens present in the United States without lawful status who "(1) have entered or will enter the United States without inspection; (2) were not or will not be apprehended upon arrival; and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the Department of Homeland Security makes an initial custody determination." *Maldonado Bautista v. Santacruz*, No. 5:25-cv-01873-SSS-BFM (C.D. Cal. July 23, 2025).

53. On November 20, 2025, the Court issued relief to all members of the class stating that their immigration detention authority falls under 8 U.S.C. § 1226(a), rather than § 1225(b)(2)(A).

54. On December 18, 2025, the Court entered final judgment certifying the nationwide class and declaring unlawful the policy of categorically detaining individuals who entered without inspection under § 1225(b)(2)(A).

55. Mr. Encalada Loja meets all requirements for *Maldonado Bautista* class membership. He is a foreign national who entered the United States in 2005 and was not intercepted by an immigration official upon entry.

56. Mr. Encalada Loja's membership in the *Maldonado Bautista* class is another independent reason why the Court should grant the habeas petition forthwith. *See* 8 U.S.C. § 2243.

PRAYER FOR RELIEF

Wherefore, Mr. Encalada Loja respectfully requests this Court to grant the following:

(1) Assume jurisdiction over this matter;

(2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days.

(3) Declare that the Respondents' detention of Mr. Encalada Loja violates the Due Process Clause of the Fifth Amendment and is unlawful under the Immigration and Nationality Act,;

(4) Issue a Writ of Habeas Corpus ordering Respondents to release Mr. Encalada Loja immediately or, alternatively, order that a neutral and impartial adjudicator conduct a bond hearing pursuant to 8 U.S.C. § 1226(a);

(5) Enjoin Respondents from transferring Mr. Encalada Loja outside of this district; and

(6) Grant any further relief this Court deems just and proper.

Respectfully submitted,

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Motion for Admission Pro Hac Vice Forthcoming

Attorneys for Petitioner

Dated: January 21, 2026

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

I represent Petitioner Luis Encalada Loja 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 21st day of January 2026.

/s/ Halle Blitzstein
Halle Blitzstein

CERTIFICATE OF SERVICE

I, Halle Blitzstein, hereby declare that, pursuant to Federal Rule of Civil Procedure 4(i), on January 21, 2026, I directed to be served the following documents in the above-captioned matter by USPS priority mail:

• Petition for Writ of Habeas Corpus;

•Notice of appearance; and

• Civil Cover Sheet

At the following addresses:

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