

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

Civil Action No. 1:26-cv-266

LEONEL SERVIN ESTEVEZ,

Petitioner,

v.

JUAN BALTAZAR, in his official capacity as Warden of the Denver Contract Detention Facility;  
ROBERT HAGAN, in his official capacity as Field Office Director, Denver Field Office of U.S.  
Immigration and Customs Enforcement;  
TODD LYONS, in his official capacity as Acting Director of U.S. Immigration and Customs  
Enforcement;  
KRISTI NOEM, in her official capacity as Secretary of U.S. Department of Homeland Security;  
and  
PAMELA BONDI, in her official capacity as Attorney General of the United States.

Respondents.

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**PETITION FOR WRIT OF HABEAS CORPUS**

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**INTRODUCTION**

1. Petitioner, LEONEL SERVIN ESTEVEZ, by and through undersigned counsel, respectfully petitions this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, challenging the statutory basis and constitutionality of his ongoing immigration detention.

2. Servin Estevez is a long-term resident of the United States who has continuously resided here since February 2006. Nearly twenty years after his entry, he was arrested in the interior of the United States and placed in removal proceedings pursuant to 8 U.S.C. § 1229a. He is presently detained at the Denver Contract Detention Facility in Aurora, Colorado, under the custody and control of Respondents.

3. Respondents are detaining Servin Estevez under 8 U.S.C. § 1225(b)(2)(A) based solely on his manner of entry. That assertion persists notwithstanding (1) his nearly twenty years of continuous residence in the United States; (2) his placement in standard removal proceedings under 8 U.S.C. § 1229a; (3) DHS's issuance of a warrant for arrest pursuant to 8 U.S.C. § 1226; and (4) the absence of any allegation that he is presently seeking admission.

4. Respondents continued detention of Servin Estevez contradicts the plain language of the statute, decades of agency practice, and controlling judicial authority. Section 1225(b)(2)(A) does not apply to individuals who have long resided in the United States and are not actively seeking admission at the time of arrest.

5. Unless this Court intervenes, Respondents' interpretation of the detention statute permits prolonged detention entirely insulated from judicial review—an outcome incompatible with statute, the Suspension Clause, and fundamental principles of due process.

6. Accordingly, Servin Estevez seeks a writ of habeas corpus directing Respondents to provide him with a bond hearing under 8 U.S.C. § 1226(a) within seven (7) days of the Court's order wherein the government bears the burden of demonstrating by clear and convincing evidence that his continued detention is warranted.

#### **CUSTODY**

7. Servin Estevez has been in the custody of Respondents since December 16, 2025. He is currently detained at the Denver Contract Detention Facility in Aurora, Colorado, under Respondents' direct physical control and supervision.

#### **JURISDICTION AND VENUE**

8. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1651 (All Writs Act), 28 U.S.C. § § 2201-02 (declaratory

relief), and Article I, section 9, clause 2 of the U.S. Constitution (Suspension Clause), as Servin Estevez is in custody and challenges his custody in violation of the Constitution and laws of the United States.

9. Federal district courts have jurisdiction under 28 U.S.C. § 2241 to hear habeas claims by individuals challenging the lawfulness of their detention. *See Zadvydas v. Davis*, 533 U.S. 678, 678 (2001).

10. Venue is proper in this District under 28 U.S.C. § 1391 and 28 U.S.C. § 2242 because Servin Estevez is confined in this District, at least one Respondent is in this District, Servin Estevez's immediate physical custodian is in this District, and a substantial part of the events giving rise to the claims in this action occurred in this District. *See Trump v. J.G.G.*, 145 S. Ct. 1003, 1005–06 (2025) (per curiam) (“For core habeas petitions, jurisdiction lies in only one district: the district of confinement” (internal quotation marks and citation omitted)).

#### **NOTICE OF RELATED CASES**

11. Pursuant to D.C.COLO.LCivR 3.2 and in the interest of judicial economy, Servin Estevez provides notice that this action is related to numerous habeas petitions recently adjudicated in this District involving the same Respondents, the same detention facility, and the same legal question concerning the scope of mandatory detention under 8 U.S.C. § 1225(b)(2)(A) as applied to long-term residents who are not presently seeking admission. *See Hernandez v. Baltazar*, No. 25-cv-03094-CNS, 2025 WL 2996643, at \*3 (D. Colo. Oct. 24, 2025); *Loa Caballero v. Baltazar*, No. 25-cv-03120-NYW, 2025 WL 2977650, at \*6 (D. Colo. Oct. 22, 2025); *Mendoza Gutierrez v. Baltazar*, No. 25-cv-2720-RMR, 2025 WL 3251143 at \*1 (D. Colo. Nov. 21, 2025); and *Garcia Cortes v. Noem*, No. 1:25-cv-02677-CNS, 2025 WL 2652880 (D. Colo. Sept. 16, 2025).

12. Most notably, two federal judges—including the Honorable Regina M. Rodriguez of this District—have conditionally certified class actions generally comprised of noncitizens newly subjected to detention under § 1225(b)(2)(A) pursuant to Respondents’ new policy. *See Mendoza Gutierrez v. Baltazar*, No. 25-cv-2720-RMR, 2025 WL 3251143, at \*1 (D. Colo. Nov. 21, 2025); *Bautista v. Noem*, --- F.R.D. ---, 2025 WL 3288403, at \*1 (C.D. Cal. Nov. 25, 2025). Those class certification decisions are currently pending on appeal before the Tenth and Ninth Circuits, respectively.

13. Notwithstanding the conditional certification of those classes, Immigration Judges have continued to decline to conduct custody redetermination hearings for noncitizens who fall within the scope of the certified classes. Immigration Judges, pursuant to guidance from the Executive Office for Immigration Review (EOIR), have taken the position that class certification alone does not displace *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), and the Immigration Court lacks jurisdiction to make custody redeterminations.

14. As a result, noncitizens who are members of the conditionally certified classes—and whose detention turns on the same statutory question presented here—remain detained without any individualized custody determination, notwithstanding the pendency of class wide litigation addressing the legality of Respondents’ detention policy. Individual habeas petitions therefore continue to be filed in this District to resolve the threshold statutory authority for detention and to prevent prolonged confinement without review.

15. Each of these matters involves materially indistinguishable facts and the same core statutory question presented here. Servin Estevez provides this Notice solely to inform the Court of related proceedings and to promote judicial efficiency but does not seek consolidation nor assignment to any particular judge.

### HABEAS CORPUS

16. Challenges to immigration detention are properly brought directly through habeas. *Soberanes v. Comfort*, 388 F.3d 1305, 1310 (10th Cir. 2004). More specifically, 8 U.S.C. § 2241 “confers jurisdiction upon the federal courts to hear such cases.” *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001) (citing 28 U.S.C. § 2241(c)(3)) (authorizing any person to claim in federal court that they are being held “in custody in violation of the Constitution or laws ... of the United States”).

17. The fundamental purpose of § 2241 habeas proceeding is the same as that of § 2254 habeas and § 2255 proceedings: they are an attack by a person in custody upon the legality of that custody, and that the traditional function of the writ is to secure release from illegal custody. *McIntosh v. U.S. Parole Com’n*, 115 F.3d 809, 811 (10th Cir. 1997) (quoting *Preiser v. Rodriguez*, 411 U.S. 475, 484 (1973)).

### PARTIES

#### **A. Petitioner**

18. Petitioner Leonel Servin Estevez was detained by Respondents on December 16, 2025, and has been detained at the Denver Contract Detention Facility since that date. He is in the custody and direct control of Respondents and their agents.

#### **B. Respondents**

19. Respondent Juan Baltazar is the Warden of the Denver Contract Detention Facility. Respondent Baltazar has immediate physical custody of Servin Estevez and is sued in his official capacity.

20. Respondent Robert Hagan is the Field Office Director of the U.S. Immigration and Customs Enforcement Denver Field Office. Respondent Hagan has immediate physical custody of Servin Estevez and is sued in his official capacity.

21. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement. Respondent Lyons is a legal custodian of Servin Estevez and is sued in his official capacity.

22. Respondent Kristi Noem is the Secretary of the U.S. Department of Homeland Security. Respondent Noem is a legal custodian of Servin Estevez and is sued in her official capacity.

23. Respondent Pamela Bondi is the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). Respondent Bondi is a legal custodian of Servin Estevez and is sued in her official capacity.

#### **FACTUAL ALLEGATIONS**

24. Servin Estevez has been a longtime Colorado resident of twenty years after he entered the United States in February 2006. *See Application for Non-LPR Cancellation of Removal, dated January 20, 2026, attached hereto as Attachment C.*

25. Servin Estevez is married and is the sole financial provider for his family, including four (4) U.S. citizen children. *See Attachment C, attached hereto.*

26. On December 16, 2025, DHS arrested Servin Estevez in the interior of the United States, long after his entry and not in connection with any attempt to seek admission.

27. DHS issued a Notice to Appear charging him as “an alien present in the United States who has not been admitted or paroled” and placing him in 8 U.S.C. § 1229a removal proceedings. *See Notice to Appear, dated December 16, 2025, attached hereto as Attachment A.*

28. DHS also issued a Form I-200, Warrant for Arrest of Alien, authorizing arrest under 8 U.S.C. § 1226(a). *See DHS Form I-200, Warrant for Arrest of Alien, dated December 16, 2025, attached hereto as Attachment B.*

29. DHS has never alleged that Servin Estevez is subject to mandatory detention under 8 U.S.C. § 1226(c), and his corresponding lack of criminal history confirms that detention category would not apply. *See Exhibit C, attached hereto.*

30. Servin Estevez has not yet requested a bond hearing before the Immigration Court. This is not due to abandonment of administrative remedies, but because of Respondents' current policy position.

31. On January 13, 2026, the Executive Office for Immigration Review (EOIR) issued a directive to Immigration Judges instructing them to deny bond redeterminations for detainees under class certifications like *Mendoza Gutierrez v. Baltazar*, No. 25-cv-2720-RMR, 2025 WL 3251143, at \*1 (D. Colo. Nov. 21, 2025) and *Bautista v. Noem*, --- F.R.D. ---, 2025 WL 3288403, at \*1 (C.D. Cal. Nov. 25, 2025), asserting that those class certifications do not purport to vacate, stay or enjoin *Matter of Yajure Hurtado*. *See EOIR Nationwide Guidance on class certifications and Matter of Yajure Hurtado, dated January 13 and 16, 2026, attached hereto as Attachment D.*

32. Servin Estevez's removal proceedings are pending, and no final removal order exists.

33. As of the filing of this Petition, Servin Estevez has been detained for over one month without any bond hearing and without relief from this Court, faces the prospect of months in immigration custody.

#### **LEGAL FRAMEWORK**

34. The relevant detention statutes at issue here are 8 U.S.C. § 1225(b)(2), which requires mandatory detention "in the case of an alien who is an applicant for admission, if the examining immigration officer determines that the alien seeking admission is not clearly and beyond a doubt entitled to be admitted," and 8 U.S.C. § 1226(a), which states that "an alien may

be arrested and detained pending a decision on whether the alien is to be removed from the United States.” 8 U.S.C. § § 1225, 1226.

35. 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.

36. Following the 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) (“Despite being applicants for admission, aliens who are present without having been admitted or paroled (formerly referred to as aliens who entered without inspection) will be eligible for bond and bond redetermination”).

37. Thus, in the decades that followed their enactment in 1996, most people who entered without inspection and were thereafter arrested and placed in standard removal proceedings were considered eligible for release on bond and received bond hearings before an IJ, unless their criminal history rendered them ineligible. 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)).

38. On July 8, 2025, ICE “in coordination with” the Department of Justice announced a new policy that rejected this well-established understanding of the statutory framework and reversed decades of practice.

39. The new policy, entitled “Interim Guidance Regarding Detention Authority for Applicants for Admission,” claims that all persons who entered the United States without admission or parole shall now be deemed “applicants for admission” under 8 U.S.C. § 1225, and therefore are subject to mandatory detention 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.

40. On September 5, 2025, the BIA adopted this same position in *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 considered applicants for admission who are seeking admission and are ineligible for IJ bond hearings. *Id.*

### ARGUMENT

#### **I. THE PLAIN STATUTORY TEXT DEMONSTRATES SERVIN ESTEVEZ IS DETAINED UNDER 8 U.S.C. § 1226(a), NOT § 1225(b)(2).**

41. Respondents have taken the position that a noncitizen who entered the country without inspection is always an ‘applicant for admission’ and subject to mandatory detention under § 1225, no matter how long the noncitizen has been present in the country. *See Loa Caballero v. Baltazar*, No. 25-cv-03120-NYW, 2025 WL 2977650, at \*10-11 (D. Colo. Oct. 22, 2025).

42. Even if Servin Estevez is an “applicant for admission,” 8 U.S.C. § 1225(b)(2)(A) requires that he also be actively “seeking admission” for the mandatory detention provision to apply to him.

43. The weight of authority interpreting § 1225 has recognized that for § 1225(b)(2)(A) to even apply, several conditions must be met—in particular, an examining immigration officer must determine that the individual is: (1) an applicant for admission; (2) seeking admission; and

(3) not clearly and beyond a doubt entitled to be admitted. *See Loa Caballero v. Baltazar*, No. 25-cv-03120-NYW, 2025 WL 2977650, at \*6 (D. Colo. Oct. 22, 2025) (citing *Martinez v. Hyde*, No. 25-cv-11613-BEM, 2025 WL 2084238, at \*2 (D. Mass. July 24, 2025)).

44. “Seeking” means “try[ing] to acquire or gain.” And “admission” is defined in the INA as “the lawful entry of the alien into the United States after inspection and authorization by an immigration officer.” 8 U.S.C. § 1101(a)(13)(A). Thus, the plain meaning of the phrase “seeking admission” requires that the applicant must be presently and actively seeking lawful entry into the United States. *Loa Caballero*, 2025 WL 2977650, at \*6 (internal citations omitted).

45. Noncitizens in Servin Estevez’s position, who entered the United States many years ago, are not “seeking admission” to the United States but are instead “seeking to remain in the United States.” *Lepe v. Andrews*, -- F. Supp. 3d --, 2025 WL 2716910, at \*5 (E.D. Cal. Sept. 23, 2025).

46. Other indicia bolster Servin Estevez’s plain text reading of the statute. First, Respondents’ proffered interpretation of § 1225 appears facially inconsistent with related implementing regulations. The implementing regulation for § 1225(b) states that “any *arriving alien* who appears to the inspecting officer to be inadmissible, and who is placed in removal proceedings pursuant to section 240 of the Act shall be detained in accordance with section 235(b) of the Act.” 8 C.F.R. § 235(c)(1) (emphasis added).

47. In this way, “[t]he regulation appears to contemplate that applicants *seeking admission* are a subset of applicants ‘roughly interchangeable’ with ‘arriving aliens.’” *Cordero Pelico v. Kaiser*, 2025 WL 2822876, at \*11 (N.D. Cal. Oct. 3, 2025) (quoting *Martinez v. Hyde*, 2025 WL 2084238, at \*6 (D. Mass. July 24, 2025)) (emphasis in original). An “arriving alien” is defined under the regulatory scheme as “an applicant for admission coming or attempting to come

into the United States at a port-of-entry.” 8 C.F.R. § 1.2. “This plainly does not describe petitioners,” like Servin Estevez, who already “reside in the United States.” *Kaiser*, 2025 WL 28227876, at \*11.

48. Further to the same point, in the Notice to Appear DHS issued commencing removal proceedings against Servin Estevez, the issuing officer retained the option to designate him as (1) “an arriving alien”; (2) “an alien present in the United States who has not been admitted or paroled”; or (3) a person who “ha[s] been admitted to the United States, but [is] removable for the reasons stated below.” In this case, the issuing officer chose the second—not the first—option to classify Servin Estevez. *See Attachment A, attached hereto.*

49. DHS also issued Form I-200, Warrant for Arrest of Alien, which is exclusively governed by 8 U.S.C. § 1226 and provides authority for a discretionary bond determination under § 1226(a). *See Exhibit B, attached hereto.*

50. Servin Estevez has been present in the United States since approximately 2006. Therefore, notwithstanding any lack of lawful status, Servin Estevez was not seeking lawful entry into the United States at the time he was detained—he was already here. He was thus not “seeking admission” and is not subject to § 1225(b)(2)(A)’s mandatory detention provision. *See Loa Caballero v. Baltazar*, No. 25-cv-03120-NYW, 2025 WL 2977650, at \*16 (D. Colo. Oct. 22, 2025) (citing *Lepe v. Andrews*, F. Supp. 3d, 2025 WL 2716910, at \*5 (E.D. Cal. Sept. 23, 2025) (“[P]etitioner is not actively ‘seeking’ ‘lawful entry’ because he already entered the United States—thirty-two years ago. If anything, petitioner is seeking to *remain* in the United States.”)).

**II. BECAUSE SERVIN ESTEVEZ IS DETAINED UNDER 8 U.S.C. § 1226(a), THE CONSTITUTIONALLY APPROPRIATE REMEDY IS A BOND HEARING WITH THE GOVERNMENT BEARING THE BURDEN OF PROOF.**

51. In addition to a violation of the plain statutory text, Servin Estevez’s continued detention without an individualized bond determination violates his right to due process.

52. The Fifth Amendment’s Due Process Clause prohibits the Government from depriving any person of “life, liberty, or property, without due process of law.” U.S. Const., amend. V. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that Clause protects.” *Zadvydas*, 533 U.S. at 690. It is well-established that “the Due Process Clause applies to ‘all persons’ within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.” *Id.* at 693.

53. If the Court concludes that Servin Estevez is detained under 8 U.S.C. § 1226(a), the due process owed to him is that provided for in § 1226—namely, an individualized bond hearing before an IJ. *See Lopez-Campos v. Raycraft*, -- F. Supp. 3d --, 2025 WL 2496379, at \*9 (E.D. Mich. Aug. 29, 2025). Servin Estevez’s continued detention without the bond hearing that should have been provided to him pursuant to § 1226 constitutes an ongoing violation of his constitutional right to due process. *See Arostegui-Maldonado v. Baltazar*, 794 F. Supp. 3d 926, 941-43 (D. Colo. 2025).

54. To remedy the constitutional violation, Servin Estevez asks the Court to find that the burden of proof at Servin Estevez’s bond hearing should rest with the Government.

55. Section 1226(a) and its implementing regulations are silent as to whether the applicant or the Government carries the burden of proof at a bond hearing. *See* 8 U.S.C. § 1226(a); 8 C.F.R. § 1003.19(d). Moreover, the Tenth Circuit has not spoken on the issue, and other Circuit Courts of Appeal remain divided. *See Rodriguez Diaz v. Garland*, 53 F.4th 1189, 1203-05 (9th Cir.

2022) (discussing Circuit split). Servin Estevez submits that the Court may nonetheless assess whether it is appropriate to shift the burden of proof to the Government in this case under either (1) the *Mathews v. Eldridge* framework, as exemplified in *L.G. v. Choate*, 744 F. Supp. 3d 1172 (D. Colo. 2024); (2) or the framework applicable to involuntary civil detainees awaiting trial or mental health treatment, as applied in *Diaz-Ceja v. McAleenan*, 2019 WL 2774211 (D. Colo. 2019).

56. This District has held that it is the Government's burden to justify a noncitizen's continued detention at a bond hearing. *Arauz v. Baltazar*, 2025 WL 3041840, at \*4 n.3 (D. Colo. Oct. 31, 2025); *see also Espinoza Ruiz v. Baltazar*, 2025 WL 3294762, at \*2 (D. Colo. Nov. 26, 2025) (ordering that the Government would carry the burden for bond hearing under §1226(a)); *Loa Caballero*, 2025 WL 2977650, at \*9 (“During such [§ 1226(a) hearing, the Respondents bear the burden of justifying detention.”); *Mendoza Gutierrez*, 2025 WL 2962908, at \*14 (“the Government shall bear the burden of justifying [detention] by clear and convincing evidence of dangerousness of risk of flight”); *Garcia Cortes v. Noem*, 2025 WL 2652880, at \*5 (D. Colo. Sept. 16, 2025) (same).

57. As a general matter, the Supreme Court has long held that the clear and convincing evidence standard applies to civil detention where an individual's liberty interest is at stake and that rationale should apply with equal force in this case, where Servin Estevez's liberty interest hangs in the balance. *See United States v. Salerno*, 481 U.S. 739, 751 (1987).

58. In sum, Servin Estevez requests that the Court order that Respondents provide him a bond hearing pursuant to 8 U.S.C. § 1226(a) within seven (7) days of the Court's order, at which the Government shall bear the burden of justifying Servin Estevez's continued detention by clear and convincing evidence of his dangerousness to the safety of the community, or of his risk of flight.

**CLAIMS FOR RELIEF**

**Count One**

**Violation of 8 U.S.C. § 1226(a), INA § 236(a)**

59. Servin Estevez realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

60. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to Servin Estevez who previously entered the country and has been residing in the United States prior to being apprehended and placed in removal proceedings by Respondents. He is subject to discretionary detention under § 1226(a).

61. The application of § 1225(b)(2) to Servin Estevez unlawfully mandates his continued detention and violates the INA.

**Count Two**

**Violation of the Due Process Clause of the Fifth Amendment  
to the United States Constitution – Substantive Due Process**

62. Servin Estevez realleges and incorporates herein the allegations contained in the preceding paragraphs of the petition as if fully set forth herein.

63. As Servin Estevez is detained under § 1226(a), he is entitled to the full procedures of that statute, including an individualized bond determination.

64. Servin Estevez's continued detention without the individualized bond determination pursuant to § 1226(a) constitutes an ongoing violation of his constitutional right to due process, that this Court must remedy.

65. Respondents' continued detention of Servin Estevez without an individualized bond determination to determine whether he is a flight risk or danger to others violates his right to due process under the Due Process Clause of the Fifth Amendment.

**PRAYER FOR RELIEF**

Petitioner Servin Estevez prays that this Court grant the following relief:

- (1) Assume jurisdiction over this matter;
- (2) GRANT the Petition for Writ of Habeas Corpus after finding that the proper statutory authority governing Servin Estevez's detention is 8 U.S.C. § 1226(a) and that 8 U.S.C. § 1225(b)(2)(A) does not apply to him;
- (3) Order Respondents to provide Servin Estevez with a bond hearing pursuant to 8 U.S.C. § 1226(a) within seven (7) days of the Court's Order;
- (4) Order that at the bond hearing, the Government shall bear the burden to justify his continued detention by clear and convincing evidence; and
- (5) Grant any further relief the Court deems just and proper.

Dated this 22nd day of January 2026.

Respectfully submitted,

/s/ Skylar M. Larson

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ATTORNEY FOR PETITIONER

**CERTIFICATE OF SERVICE**

I hereby certify that service of the foregoing **Petition for Writ of Habeas Corpus and Attachments A-D** will be effectuated contemporaneously with the Court's issuance of an Order directing service pursuant to Federal Rule of Civil Procedure 4(i), at which time true and correct copies will be mailed via **U.S. Postal Service Priority Mail Express** to the following:

**JUAN BALTAZAR**, Warden of the Denver Contract Detention Facility  
3130 N Oakland Street  
Aurora, CO 80010  
*Respondent*

**ROBERT HAGAN**, Field Office Director, Denver ICE Field Office  
12445 E. Caley Avenue  
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*Respondent*

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*Respondent*

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/s/ Skylar M. Larson  
Skylar M. Larson, Esq.

ATTORNEY FOR PETITIONER