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10 Attorneys for Petitioner  
\*Petition for pro hac vice admission

11 filed concurrently UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

12  
13 KLINSMANN BECERRA DIAZ,  
14 Petitioner,

15 v.

16 JASON KNIGHT, Field Office Director of  
Enforcement and Removal Operations, Salt  
17 Lake City Field Office, Immigration and  
Customs Enforcement; KRISTI NOEM,  
18 Secretary, U.S. Department of Homeland  
Security; U.S. DEPARTMENT OF  
19 HOMELAND SECURITY; PAMELA BONDI,  
U.S. Attorney General; EXECUTIVE OFFICE  
20 FOR IMMIGRATION REVIEW; JOHN  
MATTO, Warden of Nevada Southern  
21 Detention Center,

22 Respondents.

Case No. 2:26-cv-00247

Agency No. 

**PETITION FOR WRIT OF  
HABEAS CORPUS**

ORAL ARGUMENT REQUESTED

Expedited Hearing Requested

23

24

**INTRODUCTION**

1  
2 1. Petitioner, Klinsmann Becerra Diaz, is in the physical custody of Respondents at  
3 the Nevada Southern Detention Center. He now faces unlawful detention because the  
4 Department of Homeland Security (DHS) and the Executive Office of Immigration Review  
5 (EOIR) have concluded Petitioner is subject to mandatory detention.

6 2. Petitioner is charged with, inter alia, having entered the United States without  
7 admission or inspection. *See* 8 U.S.C. § 1182(a)(6)(A)(i).

8 3. Based on this allegation in Petitioner’s removal proceedings, DHS denied  
9 Petitioner release from immigration custody, consistent with a new DHS policy issued on July 8,  
10 2025, instructing all Immigration and Customs Enforcement (ICE) employees to consider anyone  
11 inadmissible under § 1182(a)(6)(A)(i)—i.e., those who entered the United States without  
12 admission or inspection—to be subject to detention under 8 U.S.C. § 1225(b)(2)(A) and  
13 therefore ineligible to be released on bond.

14 4. Similarly, on September 5, 2025, the Board of Immigration Appeals (BIA or  
15 Board) issued a precedent decision, binding on all immigration judges, holding that an  
16 immigration judge has no authority to consider bond requests for any person who entered the  
17 United States without admission. *See Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).  
18 The Board determined that such individuals are subject to detention under 8 U.S.C. §  
19 1225(b)(2)(A) and therefore ineligible to be released on bond.

20 5. Petitioner’s detention on this basis violates the plain language of the Immigration  
21 and Nationality Act. Section 1225(b)(2)(A) does not apply to individuals like Petitioner who  
22 previously entered and are now residing in the United States. Instead, such individuals are  
23 subject to a different statute, § 1226(a), that allows for release on conditional parole or bond.  
24

1 That statute expressly applies to people who, like Petitioner, are charged as inadmissible for  
2 having entered the United States without inspection.

3 6. Respondents' new legal interpretation is plainly contrary to the statutory  
4 framework and contrary to decades of agency practice applying § 1226(a) to people like  
5 Petitioner.

6 7. Petitioner seeks a writ of habeas corpus requiring his immediate release.

7 Respondents have already provided an alternate finding of bond in the amount of \$2,000.

### 8 JURISDICTION

9 8. Petitioner is in the physical custody of Respondents. Petitioner is detained at the  
10 Nevada Southern Detention Center in Pahrump, Nevada.

11 9. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28  
12 U.S.C. § 1331 (federal question), and Article I, section 9, clause 2 of the United States  
13 Constitution (the Suspension Clause).

14 10. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory  
15 Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

### 16 VENUE

17 11. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-  
18 500 (1973), venue lies in the United States District Court for the District of Nevada, the judicial  
19 district in which Petitioner currently is detained.

20 12. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) because  
21 Respondents are employees, officers, and agencies of the United States, and because a  
22 substantial part of the events or omissions giving rise to the claims occurred in the District of  
23 Nevada.

1  
2 **REQUIREMENTS OF 28 U.S.C. § 2243**

3 13. The Court must grant the petition for writ of habeas corpus or order Respondents  
4 to show cause “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an  
5 order to show cause is issued, Respondents must file a return “within three days unless for good  
6 cause additional time, not exceeding twenty days, is allowed.” *Id.*

7 14. Habeas corpus is “perhaps the most important writ known to the constitutional  
8 law . . . affording as it does a *swift* and imperative remedy in all cases of illegal restraint or  
9 confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). “The application for the  
10 writ usurps the attention and displaces the calendar of the judge or justice who entertains it and  
11 receives prompt action from him within the four corners of the application.” *Yong v. I.N.S.*, 208  
12 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

13 **PARTIES**

14 15. Petitioner, Klinsmann Becerra Diaz, is a citizen of Colombia who has been in  
15 immigration detention since approximately January 13, 2026. After arresting Petitioner in Boise,  
16 Idaho, ICE did not set bond. Petitioner sought release from an Immigration Judge, who denied  
17 the request, pursuant to the Board’s decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216  
18 (BIA 2025).

19 16. Respondent, Jason Knight, is the Director of the Salt Lake City Field Office of  
20 ICE’s Enforcement and Removal Operations division. As such, Jason Knight is Petitioner’s  
21 immediate custodian and is responsible for Petitioner’s detention and removal. He is named in  
22 his official capacity.

1 17. Respondent Kristi Noem is the Secretary of the Department of Homeland  
2 Security. She is responsible for the implementation and enforcement of the Immigration and  
3 Nationality Act (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms.  
4 Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

5 18. Respondent Department of Homeland Security (DHS) is the federal agency  
6 responsible for implementing and enforcing the INA, including the detention and removal of  
7 noncitizens.

8 19. Respondent Pamela Bondi is the Attorney General of the United States. She is  
9 responsible for the Department of Justice, of which the Executive Office for Immigration Review  
10 and the immigration court system it operates is a component agency. She is sued in her official  
11 capacity.

12 20. Respondent Executive Office for Immigration Review (EOIR) is the federal  
13 agency responsible for implementing and enforcing the INA in removal proceedings, including  
14 for custody redeterminations in bond hearings.

15 21. Respondent, John Mattos, is employed by CoreCivic as Warden of the Nevada  
16 Southern Detention Center, where Petitioner is detained. He has immediate physical custody of  
17 Petitioner. He is sued in his official capacity.

18 **LEGAL FRAMEWORK**

19 22. The INA prescribes three basic forms of detention for the vast majority of  
20 noncitizens in removal proceedings.

21 23. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal  
22 proceedings before an IJ. *See* 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are generally  
23 entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§ 1003.19(a), 1236.1(d),  
24

1 while noncitizens who have been arrested, charged with, or convicted of certain crimes are  
2 subject to mandatory detention, *see* 8 U.S.C. § 1226(c).

3 24. Second, the INA provides for mandatory detention of noncitizens subject to  
4 expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission  
5 referred to under § 1225(b)(2).

6 25. Last, the INA also provides for detention of noncitizens who have been ordered  
7 removed, including individuals in withholding-only proceedings, *see* 8 U.S.C. § 1231(a)–(b).

8 26. This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

9 27. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the  
10 Illegal Immigration Reform and Immigrant Responsibility Act (IIRIRA) of 1996, Pub. L. No.  
11 104–208, Div. C, §§ 302–03, 110 Stat. 3009–546, 3009–582 to 3009–583, 3009–585. Section  
12 1226(a) was most recently amended earlier this year by the Laken Riley Act, Pub. L. No. 119–1,  
13 139 Stat. 3 (2025).

14 28. Following the enactment of the IIRIRA, EOIR drafted new regulations explaining  
15 that, in general, people who entered the country without inspection were not considered detained  
16 under § 1225 and that they were instead detained under § 1226(a). *See* Inspection and Expedited  
17 Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings;  
18 Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

19 29. Thus, in the decades that followed, most people who entered without inspection  
20 and were placed in standard removal proceedings received bond hearings, unless their criminal  
21 history rendered them ineligible pursuant to 8 U.S.C. § 1226(c). That practice was consistent  
22 with many more decades of prior practice, in which noncitizens who were not deemed “arriving”  
23 were entitled to a custody hearing before an IJ or other hearing officer. *See* 8 U.S.C. § 1252(a)  
24

1 (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply  
2 “restates” the detention authority previously found at § 1252(a)).

3 30. On July 8, 2025, ICE, “in coordination with” DOJ, announced a new policy that  
4 rejected well-established understanding of the statutory framework and reversed decades of  
5 practice.

6 31. The new policy, entitled “Interim Guidance Regarding Detention Authority for  
7 Applicants for Admission,”<sup>1</sup> claims that all persons who entered the United States without  
8 inspection shall now be subject to mandatory detention provision under § 1225(b)(2)(A). The  
9 policy applies regardless of when a person is apprehended, and affects those who have resided in  
10 the United States for months, years, and even decades.

11 32. On September 5, 2025, the BIA adopted this same position in a published  
12 decision, *Matter of Yajure Hurtado*. There, the Board held that all noncitizens who entered the  
13 United States without admission or parole are subject to detention under § 1225(b)(2)(A) and are  
14 ineligible for IJ bond hearings.

15 33. Since Respondents adopted their new policies, dozens of federal courts have  
16 rejected their new interpretation of the INA’s detention authorities. Courts have likewise rejected  
17 *Matter of Yajure Hurtado*, which adopts the same reading of the statute as ICE.

18 34. Even before ICE or the BIA introduced these nationwide policies, IJs in the  
19 Tacoma, Washington, immigration court stopped providing bond hearings for persons who  
20 entered the United States without inspection and who have since resided here. There, the U.S.  
21 District Court in the Western District of Washington found that such a reading of the INA is  
22 likely unlawful and that § 1226(a), not § 1225(b), applies to noncitizens who are not

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

1 apprehended upon arrival to the United States. *Rodriguez Vazquez v. Bostock*, 779 F. Supp. 3d  
2 1239 (W.D. Wash. 2025).

3 35. Subsequently, court after court has adopted the same reading of the INA's  
4 detention authorities and rejected ICE and EOIR's new interpretation. *See, e.g., E.C., v Noem, et*  
5 *al*, No. 2:25-CV-01789-RFB-BNW, (D. Nev. Oct. 2025); *Ortiz v. Bernacke*, No. CV 2:25-  
6 CV-01833-RFB-NJK (D. Nev. November 19, 2025); *Rosado v. Figueroa*, No. CV 25-02157  
7 PHX DLR (CDB), 2025 WL 2337099 (D. Ariz. Aug. 11, 2025), *report and recommendation*  
8 *adopted*, No. CV-25-02157-PHX-DLR (CDB), 2025 WL 2349133 (D. Ariz. Aug. 13, 2025);  
9 *Lopez Benitez v. Francis*, No. 25 CIV. 5937 (DEH), 2025 WL 2371588 (S.D.N.Y. Aug. 13,  
10 2025); *Maldonado v. Olson*, No. 0:25-cv-03142-SRN-SGE, 2025 WL 2374411 (D. Minn. Aug.  
11 15, 2025); *Arrazola-Gonzalez v. Noem*, No. 5:25-cv-01789-ODW (DFMx), 2025 WL 2379285  
12 (C.D. Cal. Aug. 15, 2025); *Romero v. Hyde*, No. 25-11631-BEM, 2025 WL 2403827 (D. Mass.  
13 Aug. 19, 2025); *Samb v. Joyce*, No. 25 CIV. 6373 (DEH), 2025 WL 2398831 (S.D.N.Y. Aug.  
14 19, 2025); *Ramirez Clavijo v. Kaiser*, No. 25-CV-06248-BLF, 2025 WL 2419263 (N.D. Cal.  
15 Aug. 21, 2025); *Leal-Hernandez v. Noem*, No. 1:25-cv-02428-JRR, 2025 WL 2430025 (D. Md.  
16 Aug. 24, 2025); *Kostak v. Trump*, No. 3:25-cv-01093-JE-KDM, 2025 WL 2472136 (W.D. La.  
17 Aug. 27, 2025); *Jose J.O.E. v. Bondi*, No. 25-CV-3051 (ECT/DJF), --- F. Supp. 3d ---, 2025  
18 WL 2466670 (D. Minn. Aug. 27, 2025) *Lopez-Campos v. Raycraft*, No. 2:25-cv-12486-BRM-  
19 EAS, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025); *Vasquez Garcia v. Noem*, No. 25-  
20 cv-02180-DMS-MM, 2025 WL 2549431 (S.D. Cal. Sept. 3, 2025); *Zaragoza Mosqueda v.*  
21 *Noem*, No. 5:25-CV-02304 CAS (BFM), 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); *Pizarro*  
22 *Reyes v. Raycraft*, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025); *Sampiao v.*  
23 *Hyde*, No. 1:25-CV-11981-JEK, 2025 WL 2607924 (D. Mass.

1 Sept. 9, 2025); *see also, e.g., Palma Perez v. Berg*, No. 8:25CV494, 2025 WL 2531566, at \*2  
2 (D. Neb. Sept. 3, 2025) (noting that “[t]he Court tends to agree” that § 1226(a) and not §  
3 1225(b)(2) authorizes detention); *Jacinto v. Trump*, No. 4:25-cv-03161-JFB-RCC, 2025 WL  
4 2402271 at \*3 (D. Neb. Aug. 19, 2025) (same); *Anicasio v. Kramer*, No. 4:25-cv-03158-JFB-  
5 RCC, 2025 WL 2374224 at \*2 (D. Neb. Aug. 14, 2025) (same).

6 36. Courts have uniformly rejected DHS’s and EOIR’s new interpretation because it  
7 defies the INA. As the *Rodriguez Vazquez* court and others have explained, the plain text of the  
8 statutory provisions demonstrates that § 1226(a), not § 1225(b), applies to people like Petitioner.

9 37. Section 1226(a) applies by default to all persons “pending a decision on whether  
10 the [noncitizen] is to be removed from the United States.” These removal hearings are held under  
11 § 1229a, to “decid[e] the inadmissibility or deportability of a[] [noncitizen].”

12 38. The text of § 1226 also explicitly applies to people charged as being inadmissible,  
13 including those who entered without inspection. *See* 8 U.S.C. § 1226(c)(1)(E). Subparagraph  
14 (E)’s reference to such people makes clear that, by default, such people are afforded a bond  
15 hearing under subsection (a). As the *Rodriguez Vazquez* court explained, “[w]hen Congress  
16 creates ‘specific exceptions’ to a statute’s applicability, it ‘proves’ that absent those exceptions,  
17 the statute generally applies.” *Rodriguez Vazquez*, 779 F. Supp. 3d at 1257 (citing *Shady Grove*  
18 *Orthopedic Assocs., P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)); *see also Gomes*, 2025  
19 WL 1869299, at \*7.

20 39. Section 1226 therefore leaves no doubt that it applies to people who face charges  
21 of being inadmissible to the United States, including those who are present without admission or  
22 parole.

1 40. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who  
2 recently entered the United States. The statute’s entire framework is premised on inspections at  
3 the border of people who are “seeking admission” to the United States. 8 U.S.C.

4 § 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory detention scheme  
5 applies “at the Nation’s borders and ports of entry, where the Government must determine  
6 whether a[] [noncitizen] seeking to enter the country is admissible.” *Jennings v. Rodriguez*, 583  
7 U.S. 281, 287 (2018).

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


#### 11 **FACTS**

12 42. Petitioner is a nurse from Colombia, who entered the United States without  
13 admission or parole in April of 2022 (**Exhibits A & B**). He currently lives with his U.S. citizen  
14 husband and U.S. citizen step-son, in Boise, Idaho (**Exhibits C, D, E**).

15 43. On March 20, 2023, Petitioner pled guilty Driving Under the Influence. He  
16 satisfied all the terms imposed by the court (**Exhibit F**).

17 44. On January 13, 2026, Petitioner was detained during his annual “check-in” at the  
18 ICE office in Boise, Idaho (**Exhibit G**). He is now detained at the Nevada Southern Detention  
19 Center (**Exhibit H**).

20 45. DHS placed Petitioner in removal proceedings before the Las Vegas immigration  
21 court pursuant to 8 U.S.C. § 1229a. ICE has charged Petitioner with, *inter alia*, being  
22 inadmissible under 8 U.S.C. § 1182(a)(6)(A)(i) as someone who entered the United States  
23 without inspection.

1           46.     Petitioner has significant positive equities that weigh strongly in favor of granting  
2 relief. He is married to a U.S. citizen and has an approved I-130 petition, demonstrating a bona  
3 fide family relationship and a clear pathway to lawful permanent residency (**Exhibit I**). He is  
4 gainfully employed at Johnson Thermal Systems, where he is a responsible and contributing  
5 member of the workforce (**Exhibits J & K**). He is also a devoted step-parent to his U.S. citizen  
6 , providing emotional and financial support to his family. Additionally, he has a pending  
7 asylum application (Form I-589), reflecting his ongoing pursuit of lawful protection in the  
8 United States (**Exhibit L**). Taken together, these factors show that the respondent has deep  
9 family and community ties, stable employment, and ongoing legal avenues to regularize his  
10 status, all of which strongly favor his release from detention. Petitioner is neither a flight risk nor  
11 a danger to the community.

12           47.     Following Petitioner's arrest and transfer to the Nevada Southern Detention  
13 Center, ICE issued a custody determination to continue Petitioner's detention without an  
14 opportunity to post bond or be released on other conditions.

15           48.     Petitioner subsequently requested a bond redetermination hearing before an IJ.

16           49.     Pursuant to *Matter of Yajure Hurtado*, the Immigration Judge was unable to grant  
17 Petitioner's bond request. However, the Immigration Judge noted in her order that "[s]hould any  
18 reviewing Court determine that this Court has jurisdiction, or that the respondent must be  
19 providing a bond hearing, the Court makes the alternative finding that bond in the amount of  
20 \$2,000 plus alternatives to detention at the discretion of the DHS is an appropriate amount to  
21 ensure the [Petitioner's] appearance at future hearings." (*See Exhibit M*)

1 50. As a result, Petitioner remains in detention. Without relief from this court, he  
2 faces the prospect of months, or even years, in immigration custody, separated from his family  
3 and community.

4 **CLAIMS FOR RELIEF**

5 **COUNT I**  
6 **Violation of the INA**

7 51. Petitioner incorporates by reference the allegations of fact set forth in the  
8 preceding paragraphs.

9 52. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all  
10 noncitizens residing in the United States who are subject to the grounds of inadmissibility. As  
11 relevant here, it does not apply to those who previously entered the country and have been  
12 residing in the United States prior to being apprehended and placed in removal proceedings by  
13 Respondents. Such noncitizens are detained under § 1226(a), unless they are subject to  
14 § 1225(b)(1), § 1226(c), or § 1231.

15 53. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued  
16 detention and violates the INA.

17 **COUNT II**  
18 **Violation of the Bond Regulations**

19 54. Petitioner incorporates by reference the allegations of fact set forth in preceding  
20 paragraphs.

21 55. In 1997, after Congress amended the INA through IIRIRA, EOIR and the then-  
22 Immigration and Naturalization Service issued an interim rule to interpret and apply IIRIRA.  
23 Specifically, under the heading of “Apprehension, Custody, and Detention of [Noncitizens],” the  
24 agencies explained that “[d]espite being applicants for admission, [noncitizens] who are present

1 without having been admitted or paroled (formerly referred to as [noncitizens] who entered  
2 without inspection) will be eligible for bond and bond redetermination.” 62 Fed. Reg. at 10323  
3 (emphasis added). The agencies thus made clear that individuals who had entered without  
4 inspection were eligible for consideration for bond and bond hearings before IJs under 8 U.S.C. §  
5 1226 and its implementing regulations.

6 56. Nonetheless, pursuant to *Matter of Yajure Hurtado*, EOIR has a policy and  
7 practice of applying § 1225(b)(2) to individual like Petitioner.

8 57. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued  
9 detention and violates 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

10 **COUNT III**  
11 **Violation of Due Process**

12 58. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in  
13 the preceding paragraphs as if fully set forth herein.

14 59. The government may not deprive a person of life, liberty, or property without due process  
15 of law. U.S. Const. amend. V. “Freedom from imprisonment—from government custody,  
16 detention, or other forms of physical restraint—lies at the heart of the liberty that the  
17 Clause protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

18 60. Petitioner has a fundamental interest in liberty and being free from official restraint.

19 **REQUEST FOR RELIEF**

20 WHEREFORE, Petitioner requests that this Court grant the following relief:

- 21 a. Assume jurisdiction over this matter;
- 22 b. Order that Petitioner shall not be transferred outside the District of Nevada while  
23 this habeas petition is pending;
- 24

- 1 c. Issue an Order to Show Cause ordering Respondents to show cause why this  
2 Petition should not be granted within three days;
- 3 d. Issue a Writ of Habeas Corpus requiring that Respondents release Petitioner or, in  
4 the alternative, allow Petitioner to post bond in accordance with the Immigration  
5 Judge’s alternative ruling, within seven days;
- 6 e. Declare that Petitioner’s detention is unlawful;
- 7 f. Award Petitioner attorney’s fees and costs under the Equal Access to Justice Act  
8 (“EAJA”), as amended, 28 U.S.C. § 2412, and on any other basis justified under  
9 law; and
- 10 g. Grant any other and further relief that this Court deems just and proper.

11 DATED: This 3rd day of February, 2026

12  
13 /s/ KATHIA QUIROS

14 KATHIA QUIROS  
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16 Attorney for Petitioner  
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18 /s/ John R. Shackelford

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10 Attorneys for Petitioner

11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 KLINSMANN BECERRA DIAZ,


14 Petitioner,

15 v.

16 JASON KNIGHT, Field Office Director of  
Enforcement and Removal Operations, Salt  
17 Lake City Field Office, Immigration and  
Customs Enforcement; KRISTI NOEM,  
18 Secretary, U.S. Department of Homeland  
Security; U.S. DEPARTMENT OF  
19 HOMELAND SECURITY; PAMELA BONDI,  
U.S. Attorney General; EXECUTIVE OFFICE  
20 FOR IMMIGRATION REVIEW; JOHN  
MATTOS, Warden of Nevada Southern  
21 Detention Center,

22 Respondents.

Case No.

23 Agency No. 

24 **INDEX OF EXHIBITS**

EXHIBIT	DESCRIPTION
A	Passport biographic page
B	Notice to Appear
C	Marriage certificate
D	Spouse's naturalization certificate
E	Step-son's U.S. birth certificate
F	Judgment of Conviction
G	Form I-213
H	ICE locator printout
I	Approved I-130, Relative Petition
J	Employer Letter
K	Employment Authorization Document
L	I-589 Receipt Notice
M	Bond denial

DATED: This 3rd day of February, 2026

/s/ Kathia Quiros  
 KATHIA QUIROS  
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# Exhibit B

Uploaded on: 2/15/2023 at 11:25:33 a.m. (Mountain Standard Time) Base City: SLC,

DEPARTMENT OF HOMELAND SECURITY  
NOTICE TO APPEAR

DOB: [REDACTED]

Event No: [REDACTED]

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

File No: [REDACTED]

In the Matter of:

Respondent: KLINSMANN BACILIO BECERRA-DIAZ

currently residing at:

[REDACTED] Meridian, IDAHO, 83642

(208) 831-6380

(Number, street, city, state and ZIP code)

(Area code and phone number)

- You are an arriving alien.
- You are an alien present in the United States who has not been admitted or paroled.
- You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of COLOMBIA and a citizen of COLOMBIA;
3. You entered the United States at or near Eagle Pass, TX, on or about April 11, 2022;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.

Section 235(b)(1) order was vacated pursuant to:  8CFR 208.30  8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

2975 S DECKER LAKE DR, STE 200 WEST VALLEY CITY UT 841196094. EOIR Salt Lake City, UT

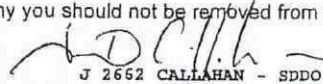
(Complete Address of Immigration Court, including Room Number, if any)

on December 3, 2024 at 1:00 PM to show why you should not be removed from the United States based on the

(Date)

(Time)

charge(s) set forth above.

  
J 2652 CALLAHAN - SDDO

(Signature and Title of Issuing Officer)

Date: January 12, 2023

Boise, Idaho

(City and State)

This Notice to Appear Supersedes the Notice to Appear issued on April 12, 2022

EOIR - 1 of 3

**Notice to Respondent**

**Warning:** Any statement you make may be used against you in removal proceedings.

**Alien Registration:** This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

**Representation:** If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

**Conduct of the hearing:** At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge. You will be advised by the immigration judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

**One-Year Asylum Application Deadline:** If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at [www.uscis.gov/i-589](http://www.uscis.gov/i-589). Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

**Failure to appear:** You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

**Mandatory Duty to Surrender for Removal:** If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

**U.S. Citizenship Claims:** If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

**Sensitive locations:** To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

**Request for Prompt Hearing**

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

\_\_\_\_\_  
(Signature of Respondent)

Date: \_\_\_\_\_

\_\_\_\_\_  
(Signature and Title of Immigration Officer)

**Certificate of Service**

This Notice To Appear was served on the respondent by me on January 12, 2023, in the following manner and in compliance with section 239(a)(1) of the Act.

- in person     by certified mail, returned receipt # \_\_\_\_\_ requested     by regular mail
- Attached is a credible fear worksheet.
- Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the \_\_\_\_\_ language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

\_\_\_\_\_  
(Signature of Respondent if Personally Served)

DAVID PERKINS - Deportation Officer

\_\_\_\_\_  
(Signature and Title of officer)

EOIR - 2 OF 3

### Privacy Act Statement

**Authority:**

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S. Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

**Purpose:**

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

**Routine Uses:**

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement, other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

**Disclosure:**


Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

# Exhibit G

U.S. Department of Homeland Security

Subject ID : XXXXXXXXXX

Record of Deportable/Inadmissible Alien

Family Name (CAPS) <b>BECERRA-DIAZ, KLINSMANN BACILIO</b>		First	Middle	Sex <b>M</b>	Hair <b>BLK</b>	Eyes <b>BRO</b>	Cmplxn <b>LBR</b>
Country of Citizenship <b>COLOMBIA</b>	Passport Number and Country of Issue <span style="background-color: black; color: black;">XXXXXXXXXX</span>	File Number <span style="background-color: black; color: black;">XXXXXXXXXX</span>		Height <b>60</b>	Weight <b>160</b>	Occupation <b>Employee</b>	
U.S. Address				Scars and Marks			
Date, Place, Time, and Manner of Last Entry <b>04/11/2022 Unknown Time, EGP, WI-Without Inspection</b>			Passenger Boarded at	F.B.I. Number <span style="background-color: black; color: black;">XXXXXXXXXX</span>			
Number, Street, City, Province (State) and Country of Permanent Residence				<input type="checkbox"/> Single <input type="checkbox"/> Divorced <input type="checkbox"/> Married <input type="checkbox"/> Widower <input type="checkbox"/> Separated			
Date of Birth <span style="background-color: black; color: black;">XXXXXXXXXX</span>	Age: <b>35</b>	Date of Action	Location Code <b>BOI/SLC</b>	Method of Location/Apprehension: <b>NCA</b>			
City, Province (State) and Country of Birth <b>COLOMBIA</b>		AR <input checked="" type="checkbox"/>	Form : (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input type="checkbox"/>	At/Near <b>See I-831</b>	Date/Hour <b>01/13/2026 09:35</b>		
NIV Issuing Post and NIV Number	Social Security Account Name			By <b>A 3114 CHAMBERLAND</b>			
Date Visa Issued	Social Security Number			Status at Entry		Status When Found	
Immigration Record <b>POSITIVE - See Narrative</b>			Criminal Record <b>See Narrative</b>				
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate)						Number and Nationality of Minor Children <b>None</b>	
Father's Name, Nationality, and Address, if Known <b>CARLOS NATIONALITY: COLOMBIA</b>			Mother's Present and Maiden Names, Nationality, and Address, if Known <b>MARIA NATIONALITY: COLOMBIA</b>				
Monies Due/Property in U.S. Not in Immediate Possession <b>None Claimed</b>		Fingerprinted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Systems Checks <b>See Narrative</b>	Charge Code Words(s) <b>See Narrative</b>			
Name and Address of (Last)(Current) U.S. Employer <b>See Narrative</b>		Type of Employment <b>Unrelated</b>	Salary	Employed from/to Hr <b>10/23/2023</b>			
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and elements which establish administrative and/or criminal violation. Indicate means and route of travel to interior.)							
FIN: <span style="background-color: black; color: black;">XXXXXXXXXX</span>		Left Index fingerprint			Right Index fingerprint		
							
<b>FAMILY INFORMATION</b>							
Father: CARLOS is a citizen of COLOMBIA. Mother: MARIA is a citizen of COLOMBIA. Spouse: Subject is not married. Child: Subject does not have children or dependents.							
<b>IMMIGRATION RECORD</b>							
History was expected but not provided ... (CONTINUED ON I-831)							
Alien has been advised of communication privileges _____ (Date/Initials)				_____ (Signature and Title of Immigration Officer)			
Distribution:				Received: (Subject and Documents) (Report of Interview)			
				Officer: _____			
				on: _____ (time)			
				Disposition: <b>Other</b>			
				Examining Officer: _____			

EOIR - 1 of 3



U.S. Department of Homeland Security

Continuation Page for Form I-213

Alien's Name <b>BECERRA-DIAZ, KLINSMANN BACILIO</b>	File Number [REDACTED] Event No: [REDACTED]	Date 01/13/2026
--	---	--------------------

BECERRA was advised of his right to speak to a consulate officer from Colombia. BECERRA states he has fear of persecution or torture if removed to Colombia. BECERRA has an approved I-130 and an I-589 that has been admin closed. BECERRA was placed into ICE custody pending detained hearings, form I-830 completed and sent to EOIR. BECERRA was provided a list of free legal services. BECERRA was provided a copy of the On-line Detainee Locator System privacy notice. BECERRA will be held in ICE custody pending removal from the United States. BECERRA claims he did not attend/graduate high school in the United States. BECERRA claims he did not receive a G.E.D. or equivalent. BECERRA claims he did not serve in the United States military. BECERRA claims to have 2 children. 1 adult USC and 1 minor child living in Colombia. BECERRA claims to be married. Ariel PEREZ-Castillo, USC ([REDACTED]), DOB: [REDACTED]. BECERRA claims to be in good health and states he is not currently under the care of a physician and is not taking any medications. BECERRA completed a phone call on 01/13/2026. BECERRA called: Spouse, Ariel PEREZ-Castillo, phone #208 288-2535, at 0945.

OTHER IDENTIFYING NUMBERS

[REDACTED]

Signature	Title
-----------	-------

EOIR - 3 of 3

# Exhibit H

Official Website of the Department of Homeland Security



U.S. Immigration and Customs Enforcement

Report Crimes: Email or Call 1-866-DHS-2-ICE

Home Who We Are **What We Do** Newsroom Information Library Contact ICE

### Search Results: 1

KLINSMANN BACILIO BECERRA-DIAZ

Country of Birth : Colombia

A-Number:

Status : In ICE Custody

State: NV

Current Detention Facility: NEVADA SOUTHERN DETENTION CENTER

*\* Click on the Detention Facility name to obtain facility contact information*

[BACK TO SEARCH >](#)

### Related Information

#### Helpful Info

- [Status of a Case](#)
- [About the Detainee Locator](#)
- [Brochure](#)
- [ICE ERO Field Offices](#)
- [ICE Detention Facilities](#)
- [Privacy Notice](#)

#### External Links

- [Bureau of Prisons Inmate Locator](#)



[DHS.gov](#) [USA.gov](#) [OIG](#) [Open Gov](#) [FOIA](#) [Metrics](#) [No Fear Act](#) [Site Map](#) [Site Policies & Plug-Ins](#)

# Exhibit J



January 21, 2026

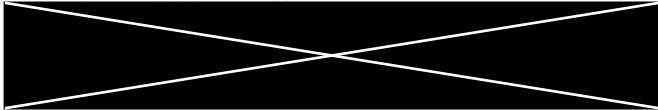
To whom it may concern,

This letter is to verify that Klinsmann Becerra Diaz has been employed with **Johnson Thermal Systems (JTS)** from 11/10/2025 to 01/12/2026

Sincerely,

A handwritten signature in cursive script that reads 'Nicol Gahley'.

Nicol Gahley  
HR Business Partner



## EXHIBIT J

JTS.com

# Exhibit L

U.S Department of Justice  
Executive Office for Immigration Review  
Immigration Court  
2975 South Decker Lake Drive # 200  
West Valley City, UT 84119-6094

PRO-SE

Re: Klinsmann Bacilio Becerra Diaz



Dear Clerk of the Court:

Attached please find above- reference individual's application for Asylum, Withholding of Removal, and relief under the Convention against Torture (Form I-589). Pursuant to OPPM 16-01, I am hereby filing Form I-589, on Mr. Klinsmann Bacilio Becerra Diaz, behalf. Enclosed please find.

1. An original Application for Asylum and for Withholding of Removal (Form I-589), plus one copy for return services.
2. One passport-sized photograph of Mr. Klinsmann Bacilio Becerra Diaz is attached to a page of the original Form I-589.
3. One copies of Ms. Klinsmann Bacilio Becerra Diaz Colombian passport.

Please do not hesitate to contact me at the number indicated if you have any questions regarding this matter. Thank you for your consideration.

Sincerely,

Klinsmann Bacilio Becerra Diaz



Klinsmann Bacilio Becerra Diaz  
6200 North River Pointe Dr,  
Apto D303, Garden City, ID  
83714  
Phone: 208-831-6380  
Email:Klinsmannbecerra@gmail.Com

DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR  
IMMIGRATION REVIEW  
  
APR 26 2023  
  
FILED WITH  
IMMIGRATION COURT  
SALT LAKE CITY, UTAH

ECIR - 1 of 11

# Exhibit M



UNITED STATES DEPARTMENT OF JUSTICE  
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW  
LAS VEGAS IMMIGRATION COURT

Respondent Name:

BECERRA-DIAZ, KLINSMANN

To:

Shackelford, John Richard  
300 W. Myrtle Street  
Suite 200  
Boise, ID 83702

A-Number:



Riders:

In Custody Redetermination Proceedings

Date:

01/27/2026

**ORDER OF THE IMMIGRATION JUDGE**

The respondent requested a custody redetermination pursuant to 8 C.F.R. § 1236. After full consideration of the evidence presented, the respondent's request for a change in custody status is hereby ordered:

Denied, because

Immigration Judges only have the authority to consider matters that are delegated to them by the Attorney General and the Immigration and Nationality Act. Matter of A-W-, 25 I&N Dec. 45, 46 (BIA 2009), citing 8 CFR § 1003.10(b).

The DHS argues that the Court lacks jurisdiction to grant a bond in this matter. This Court recognizes that litigation surrounding bond eligibility has been ongoing since the BIA's decision in Matter of Yajure Hurtado largely stripped immigration courts of the ability to grant bonds. Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025). The Court acknowledges the orders in Maldonado Bautista v. Santacruz et al., 2025 WL 3288403 (Nov. 25, 2025) and 2025 WL 3713987 (Dec. 18, 2025). Some federal district courts, including the District of Nevada, have held that the Maldonado Baustista Court's ruling extended declaratory relief to the certified class.

The official position of EOIR is that Maldonado Bautista is not a nationwide injunction and does not purport to vacate, stay, or enjoin Yajure Hurtado. Therefore, Yajure Hurtado remains binding precedent on agency adjudicators. For clarification, declaratory judgments differ from injunctions in that the former clarifies parties' legal rights and relationships without ordering specific action, while the latter is a court order compelling a party to do or stop doing a specific act. A declaratory judgment is not an equitable remedy and does not, by itself, have the effect of compelling a specific action by a party.


Pursuant to official agency policy, immigration courts no longer have the authority to issue bonds to any individual falling under Matter of Yajure Hurtado (namely any individual who has not been admitted to the United States). Because this court lacks

**EXHIBIT M**

the delegated authority to consider bond for individuals who have not been admitted to the United States, this Court must find that the respondent is not eligible for release on bond.

- Granted. It is ordered that Respondent be:
  - released from custody on his own recognizance.
  - released from custody under bond of \$
  - other:

Other:  
 The Court notes that the respondent has not been granted individualized relief from the District Court. Should any reviewing Court determine that this Court has jurisdiction, or that the respondent must be provided a bond hearing, the Court makes the alternative finding that bond in the amount of \$2,000 plus alternatives to detention at the discretion of the DHS is an appropriate amount to ensure the respondent's appearance at future hearings.



Immigration Judge: ROBERTS, LINDSY 01/27/2026

Appeal: Department of Homeland Security:  waived  reserved  
 Respondent:  waived  reserved

Appeal Due: 02/26/2026

**Certificate of Service**

This document was served:

Via: [ M ] Mail | [ P ] Personal Service | [ E ] Electronic Service | [ U ] Address Unavailable

To: [ ] Alien | [ ] Alien c/o custodial officer | [ E ] Alien atty/rep. | [ E ] DHS

Respondent Name : BECERRA-DIAZ, KLINSMANN | A-Number : 

Riders:

Date: 01/27/2026 By: MILLS, MELISSA, Court Staff