

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Civil No. 26-cv-01122-ECT-LIB

VICTOR ALFREDO TORRES OCAMPO,

Petitioner,

v.

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

PAMELA BONDI, *et al.*,

Respondents.

Petitioner filed this petition for a writ of habeas corpus to secure a bond hearing in connection with Petitioner’s detention by the U.S. Immigration and Customs Enforcement. This petition raises legal and factual issues similar to those in prior habeas petitions this Court has decided. Those issues are currently before the Eighth Circuit on expedited review in *Avila v. Bondi*, No. 25-3248 (8th Cir. docketed Nov. 10, 2025).

Additionally, although this authority is persuasive, rather than controlling, the Federal Respondents would note that in the recent 5th Circuit decision of *Buenroostro-Mendez v. Bondi et. al.*, 2026 WL 323330 (S.D. TX Feb., 6 2026), the appeals court sided with the Government’s interpretation of § 1225, after taking into consideration, “the relevant provisions and structure of the Immigration and Naturalization Act, the statutory history, and Congressional intent.”

Rather than belabor these proceedings by rearguing points the Court has considered and rejected, Federal Respondents assert all arguments raised by the government in *Avila* and endorsed by *Buenoroostro-Mendez* and respectfully request that the Court preserve those arguments for any appeal in this case. Cf. *Mauro Johnny P.P. v. Lyons*, Case No.

26-cv-204 (LMP/DJF), Order, ECF No. 5 at 2 n.1 (calling abbreviated response “a model example” in the circumstances, as it “preserves the Government’s arguments for appeal while avoiding the effort of filing the same recycled template that this Court has already rejected”). The Government would also like to note that it has attached a warrant to this Petition, satisfying the Court’s inquiry in this regard.

Signature Page to Follow

Dated: February 8, 2026

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s/ Matt Isihara

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