IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 26-cv-00574-WJM

GILBERTO QUIROZ ZACARIAS,

Petitioner,

v.

MARKWAYNE MULLIN,[1] Secretary, U.S. Department of Homeland Security;
TODD M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement;
GEORGE VALDEZ,[2] Field Office Director, U.S. Immigration and Customs Enforcement, Enforcement and Removal Operation's Field Office; and
JUAN BALTAZAR, Warden of the Denver Contract Detention Facility,

Respondents.

SUPPLEMENTAL RESPONSE TO AMENDED PETITION FOR WRIT OF HABEAS CORPUS (ECF No. 19) AND ORDER TO SHOW CAUSE (ECF Nos. 18, 21)

Respondents hereby supplement their Response to the Amended Petition and Orders to Show Cause (ECF No. 22, filed April 13, 2026) because there have been new developments since Respondents filed their Response. Specifically, the Immigration Judge granted the Department of Homeland Security's Motion to Clarify the Bond Order. *See* Ex. A, Order of the Immigration Judge. In the Order, the Immigration Judge clarified that at Petitioner's March 20, 2026, bond hearing, "the Government bore the burden to justify [Petitioner's] continued detention by clear and convincing evidence. The Court finds that the Government met its burden to establish that [Petitioner] is both

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[1] Markwayne Mullin, Secretary, U.S. Department of Homeland Security, is substituted for Kristi Noem pursuant to Fed. R. Civ. P. 25(d).
[2] George Valdez, Field Office Director, is substituted for Robert Guadian pursuant to Fed. R. Civ. P. 25(d).

a danger and a flight risk." *Id.*

Dated: April 14, 2026

Respectfully submitted,

PETER MCNEILLY
United States Attorney

s/ Julia M. Prochazka
Julia M. Prochazka
Assistant United States Attorney
United States Attorney's Office
1801 California Street, Suite 1600
Denver, Colorado 80202
Telephone: (303) 454-0100
Email: julia.prochazka@usdoj.gov

Counsel for Respondents

CERTIFICATE OF SERVICE

I hereby certify that on April 14, 2026, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system.

s/ Julia M. Prochazka
Julia M. Prochazka
Assistant United States Attorney
Counsel for Respondents