

FILED  
U.S. DISTRICT COURT  
DISTRICT OF COLORADO

2026 FEB 26 PM 3:18

JEFFREY P. COLWELL  
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**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO**

EDISON G. GUAMAN TONATO )  
 )  
 Petitioner, )  
 )  
 v. )  
 )  
 JUAN BALTASAR, Warden/Administrator, )  
 Denver Contract Detention Facility, and )  
 TODD LYONS, Acting )  
 Director U.S. Immigrations and Customs )  
 Enforcement, and KRISTI NOEM, U.S. Secretary )  
 of Homeland Security, )  
 )  
 Respondents. )  
 \_\_\_\_\_ )

BY \_\_\_\_\_ DEP. CLK  
Civil Action NO. \_\_\_\_\_

**MOTION FOR IMMEDIATE RELEASE**

Petitioner moves for immediate release pending adjudication.

**I. Likelihood of Success**

Petitioner has demonstrated a strong likelihood of success because detention is unreasonably prolonged and unconstitutional as applied.

**II. Irreparable Harm**

Loss of liberty constitutes irreparable injury.

**III. Balance of Equities**

Petitioner:

- Has no criminal record
- Poses no danger
- Poses no flight risk
- Is amenable to supervision

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**IV. Requested Relief**

Immediate release; or expedited bond hearing within 7–14 days.

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Respectfully submitted,



Edison G. Guaman Tonato

Denver Contract Detention Facility

3130 N. Oakland Street

Aurora, CO 80010

[Redacted address line]

Email: [Redacted email address]

Date: February 25, 2026

Prepared with the assistance of my attorney, David Appapa Deranamie, **not licensed** to practice in the 10<sup>th</sup> Circuit