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10 Attorneys for Petitioner, Huiqiang Xu, on a Pro Bono Basis

11 **UNITED STATES DISTRICT COURT**
12 **SOUTHERN DISTRICT OF CALIFORNIA**

13 HUIQIANG XU,

14 Petitioner,

15 v.

16 Pamela BONDI, in her official capacity as
17 Attorney General of the United States; Kristi
18 NOEM, in her official capacity as Secretary of
19 Homeland Security; TODD M. LYONS, in his
20 official capacity as Acting Director of U.S.
21 Immigration and Customs Enforcement (ICE);
22 GREGORY ARCHAMBEAULT, in his
23 official capacity as Field Office Director, San
24 Diego Field Office, U.S. Immigration and
25 Customs Enforcement and CHRISTOPHER J.
26 LAROSE, in his official capacity as
27 Warden/Facility Director of the Otay Mesa
28 Detention Center,

Respondents.


Case No.: '26CV1765 GPC DEB

**PETITION FOR WRIT OF HABEAS
CORPUS PURSUANT TO 28 U.S.C. § 2241**


IMMIGRATION HABEAS CASE

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INTRODUCTION

1. Mr. Xu on February 28, 2026, and transferred him to a high-security detention facility. This sudden detention has plunged his family into profound financial and emotional distress and has severely aggravated the health conditions of his elderly parents in China.
2. Mr. Xu's continued detention is legally unsupportable and violates both statutory law and the Due Process Clause of the Fifth Amendment. Because the BIA vacated the Immigration Judge's prior denial on November 4, 2025, and remanded the record for a new decision, there is currently no final order of removal in effect. Consequently, Mr. Xu is a non-citizen in ongoing Section 240 removal proceedings, yet he is literally being denied the fundamental right to an individualized bond hearing.
3. Furthermore, Respondents' reliance on categorical bars to detention—such as those recently challenged and vacated in the Central District of California in *Maldonado Bautista v. DHS*—cannot override Mr. Xu's constitutional right to be free from arbitrary civil imprisonment. Because Mr. Xu's underlying asylum claim is derived from a finding of per se persecution  already sustained by the BIA, his ultimate success on the merits is highly probable, rendering his current detention neither reasonable nor related to a legitimate government purpose.
4. Petitioner brings this Emergency Petition for Writ of Habeas Corpus to end his unlawful detention. This Court should issue the Writ and order Mr. Xu's immediate release, or, in the alternative, order an immediate bond hearing before a neutral adjudicator where the Government bears the burden of proving that his continued detention is necessary.

CUSTODY

5. Petitioner Huiqiang Xu  is currently civilly imprisoned in the legal and physical custody of Respondents. Mr. Xu is being detained at the Otay Mesa Detention Center, located at 7488 Calzada De La Fuente, San Diego, CA 92154.

JURISDICTION

6. This action arises under the Constitution of the United States and the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1101 et seq.

1 7. This Court has subject matter jurisdiction over this Verified Emergency Petition for Writ of
2 Habeas Corpus pursuant to 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal
3 question), 28 U.S.C. § 1651 (the All Writs Act), and Article I, Section 9, Clause 2 of the
4 United States Constitution (the Suspension Clause).

5 **VENUE**

6 8. Venue is proper in the United States District Court for the Southern District of California
7 pursuant to 28 U.S.C. § 1391(b) and (e) and 28 U.S.C. § 2241(a).

8 9. Petitioner is currently detained by Respondents at the Otay Mesa Detention Center, located
9 at 7488 Calzada De La Fuente, San Diego, CA 92154.

10 10. The Otay Mesa Detention Center is located within San Diego County, which falls within the
11 jurisdictional boundaries of the Southern District of California.

12 11. Under the "immediate custodian rule," the proper venue for a habeas petition is the judicial
13 district where the prisoner is confined and where the immediate custodian—in this case, the
14 Warden of the Otay Mesa Detention Center—is located.

15 12. Furthermore, Respondent Gregory Archambeault, the Field Office Director for the ICE San
16 Diego Field Office, maintains his official residence and conducts legal oversight of
17 Petitioner's detention within this District.

18 13. Assigning this case to the San Diego Division is appropriate because the events giving rise
19 to this Petition, specifically the physical detention of Petitioner and the administrative
20 decisions regarding his custody, are occurring within San Diego County.

21 **EXHAUSTION**

22 14. Petitioner is not required to exhaust administrative remedies. Exhaustion for habeas claims
23 brought under 28 U.S.C. § 2241 is a prudential, rather than a jurisdictional, requirement.

24 15. The prudential exhaustion requirement may be waived by this Court where "administrative
25 remedies are inadequate or not efficacious, pursuit of administrative remedies would be a
26 futile gesture, [or] irreparable injury will result". Each of these conditions is present in Mr.
27 Xu's case.

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1 16. Pursuit of a bond hearing before an Immigration Judge would be a futile gesture due to the
2 current legal landscape. Under the Board of Immigration Appeals' ("BIA") binding
3 precedent in *Matter of Yajure-Hurtado*, 28 I&N Dec. 751 (BIA 2024), the agency has
4 explicitly stripped Immigration Judges of the authority to conduct bond hearings for
5 noncitizens who, like Petitioner, entered without inspection ("EWI") and are classified as
6 "applicants for admission" under INA § 235(b)(2)(A).

7 17. Although a district court in this circuit recently vacated *Yajure-Hurtado* in *Maldonado*
8 *Bautista v. DHS*, Case No. 5:25-cv-01873-SSS-BFM, that ruling has been stayed by the
9 Ninth Circuit as of March 6, 2026. Consequently, the Executive Office for Immigration
10 Review ("EOIR") is currently mandated to follow the restrictive *Yajure-Hurtado* standard,
11 making any administrative request for a bond hearing a "dead letter" that the agency lacks
12 the authority to grant.

13 18. Furthermore, exhaustion is not required because Petitioner's claims involve fundamental
14 Fifth Amendment Due Process challenges to his categorical detention. It is well-settled that
15 the immigration agency lacks the authority to adjudicate constitutional questions.

16 19. Requiring Petitioner to undergo a lengthy and ultimately futile administrative process would
17 cause certain irreparable injury. Mr. Xu has been the sole financial provider for his wife and
18 two young children, including a one-year-old U.S. citizen child, for nearly three years. His
19 sudden detention while working as an Uber driver has left his family in a state of extreme
20 financial and emotional instability.

21 20. Moreover, Petitioner's elderly parents in rural China, both in their seventies, have suffered a
22 serious aggravation of their health conditions directly resulting from the stress of his
23 detention. Every additional day Petitioner remains in custody without a bond hearing
24 constitutes a severe and irreparable deprivation of his liberty and a worsening of these
25 humanitarian crises.

26 **PARTIES**

27 21. HUIQIANG XU ("Petitioner" or "Mr. Xu") is a native and citizen of the People's Republic
28 of China. He is currently civilly detained by U.S. Immigration and Customs Enforcement

1 ("ICE") at the Otay Mesa Detention Center in San Diego, California. Mr. Xu has resided in
2 California since March 2023, following his entry into the United States near San Luis,
3 Arizona, on or about February 20, 2023. He is a devoted husband and father to two children,
4 including a one-year-old United States citizen child and a five-year-old derivative asylum
5 seeker.

6 22. PAMELA BONDI is the Attorney General of the United States. In this capacity, she is
7 responsible for the administration of the immigration laws pursuant to 8 U.S.C. § 1103(g)
8 and oversees the Executive Office for Immigration Review ("EOIR"). She has ultimate legal
9 custody of Petitioner and is sued in her official capacity.

10 23. KRISTI NOEM is the Secretary of the U.S. Department of Homeland Security ("DHS"). She
11 is responsible for the administration and enforcement of the immigration laws and oversees
12 ICE. As Secretary, she is a legal custodian of Petitioner. She is sued in her official capacity.

13 24. TODD M. LYONS is the Acting Director of U.S. Immigration and Customs Enforcement.
14 In this role, he is responsible for ICE's policies and practices, including the civil detention
15 of noncitizens. He is a legal custodian of Petitioner and is sued in his official capacity.




16 25. GREGORY ARCHAMBEAULT is the Field Office Director of the ICE San Diego Field
17 Office. He is responsible for carrying out ICE's immigration detention and removal
18 operations within the San Diego area, which includes the Otay Mesa Detention Center. He
19 is a legal custodian of Petitioner and is sued in his official capacity.

20 26. CHRISTOPHER J. LAROSE is the Warden and Facility Director of the Otay Mesa
21 Detention Center. He is the immediate physical custodian of Petitioner, exercising day-to-
22 day control over his confinement. He is sued in his official capacity.

23 **FACTUAL ALLEGATIONS**

24 27. Petitioner Huiqiang Xu is a 36-year-old native and citizen of the People's Republic of China.
25 He currently resides in California with his wife, Li Chen, and their two children.

26 28. Mr. Xu arrived in the United States near San Luis, Arizona, on or about February 20, 2023.
27 He was not then admitted or paroled after inspection by an Immigration Officer. **Exhibit A.**
28 *NTA.*

- 1 29. On March 8, 2023, the Department of Homeland Security ("DHS") issued a Notice to Appear
2 ("NTA"), charging Mr. Xu with removability under INA § 212(a)(6)(A)(i) as a noncitizen
3 present in the United States without being admitted or paroled. *Id.*
- 4 30. Following his initial processing, Mr. Xu was released into the interior of the United States.
5 He has since resided in California for nearly three years, maintaining a stable home for his
6 family in Rowland Heights and Fontana.
- 7 31. For approximately three years, Mr. Xu has been a law-abiding member of his community
8 with no criminal history. He worked diligently as an Uber driver to provide the sole financial
9 support for his wife and two young children.
- 10 32. Mr. Xu's family includes his wife, Li Chen, their five-year-old daughter,  and
11 a one-year-old United States citizen child born in California.
- 12 33. On February 4, 2025, an Immigration Judge initially denied the family's applications for
13 asylum and withholding of removal. Mr. Xu and his daughter sought relief as derivative
14 beneficiaries of his wife's lead application. **Exhibit B. IJ Order.**
- 15 34. On November 4, 2025, the Board of Immigration Appeals ("BIA") issued a decision
16 sustaining the respondents' appeal. The BIA found that the Immigration Judge misapplied
17 relevant law, noting that Mr. Xu's wife had credibly established she 
18  in China. **Exhibit C. BIA Decision.**
- 19 35. The BIA explicitly held that this constituted per se persecution, creating a legal presumption
20 of a well-founded fear of future persecution. Consequently, the BIA vacated the prior
21 decision and remanded the record for further proceedings and the issuance of a new decision.
- 22 36. As a result of the BIA's vacatur and remand, there is currently no final order of removal
23 against Mr. Xu. He is a noncitizen in ongoing "Section 240" removal proceedings with a
24 presumptively meritorious claim for asylum.
- 25 37. On February 28, 2026, despite his ongoing proceedings and lack of a final order, ICE agents
26 detained Mr. Xu while he was working as an Uber driver. He was subsequently transferred
27 to the Otay Mesa Detention Center on March 1, 2026. **Exhibit D. DHS I-830. Exhibit E.**
28 *Huiqiang Xu ICE Detention Lookup.*

1 38. Mr. Xu's sudden and arbitrary detention has caused extreme hardship. His wife and two
2 young children are experiencing severe financial and emotional distress as they have lost
3 their primary caregiver and sole breadwinner.

4 39. Furthermore, the detention has had a devastating impact on Mr. Xu's elderly parents, who
5 reside in a rural area of China and are in their seventies. Their pre-existing health conditions
6 have aggravated significantly due to the acute stress and anxiety caused by their son's arrest
7 and the uncertainty of his safety.

8 40. Mr. Xu is neither a flight risk nor a danger to the community. He has strong family ties to
9 the United States, a pending path to legal status through the BIA's favorable findings, and a
10 history of compliance with all immigration requirements prior to his recent arrest.

11 LEGAL FRAMEWORK

12 I. Statutory Authority for Habeas Corpus Review

13 41. Under 28 U.S.C. § 2241, federal district courts have the broad authority to grant a writ of
14 habeas corpus to any person held "in custody in violation of the Constitution or laws or
15 treaties of the United States". The Supreme Court has long recognized that this federal
16 habeas review is the proper vehicle for noncitizens to challenge the lawfulness of their
17 physical confinement by immigration authorities. See *Zadvydas v. Davis*, 533 U.S. 678, 687
18 (2001).

19 42. This Court's jurisdiction is further grounded in the Suspension Clause of the United States
20 Constitution, which mandates that the privilege of the writ of habeas corpus shall not be
21 suspended except in extreme cases of rebellion or invasion. As an "immigration habeas
22 case," this action seeks a "swift and imperative remedy" for what Petitioner alleges is an
23 illegal restraint of his liberty. See *Fay v. Noia*, 372 U.S. 391, 400 (1963).

24 43. Petitioner meets the "in custody" requirement of § 2241 because he is currently detained by
25 Respondents at the Otay Mesa Detention Center in San Diego, California, where he remains
26 under the direct and exclusive control of the Department of Homeland Security and its
27 agents. Because the legality of his detention is at issue—and not the ultimate discretionary
28 decision of whether he should be removed—this Court maintains its "core" habeas

1 jurisdiction to ensure that the executive branch's detention of Petitioner comports with the
2 Immigration and Nationality Act and the Fifth Amendment.

3 **II. The Two Distinct Detention Regimes Under the INA**

4 44. The Immigration and Nationality Act ("INA") establishes two primary and mutually
5 exclusive detention frameworks for noncitizens in removal proceedings: 1) Mandatory
6 Detention under 8 U.S.C. § 1225(b)(2)(A): This provision applies strictly to "applicants for
7 admission" who are currently "seeking admission" at a port of entry. Detention under this
8 section is categorical and does not afford the noncitizen a bond hearing before an
9 Immigration Judge; and 2) Discretionary Detention under 8 U.S.C. § 1226(a): This provision
10 applies to noncitizens "already in the country" who are pending a decision on whether they
11 are to be removed. Under this regime, the Attorney General has the authority to release a
12 noncitizen on bond or conditional parole. Crucially, individuals detained under § 1226(a)
13 are entitled to an individualized bond hearing to determine if they pose a danger to the
14 community or a flight risk.

15 45. The distinction between these two regimes depends on whether the noncitizen has "effected
16 an entry" into the United States. While the Government may attempt to reclassify interior
17 residents as "applicants for admission" to bypass bond requirements—citing recent agency
18 shifts like *Matter of Yajure-Hurtado*—the Ninth Circuit has maintained that once an
19 individual has entered and established a life within the interior, their detention is governed
20 by the discretionary standards of § 1226(a).

21 46. Mr. Xu is properly categorized under 8 U.S.C. § 1226(a). He did not just arrive at the border;
22 rather, he has lived openly in California for nearly three years, worked as an Uber driver,
23 and raised a family that includes a one-year-old United States citizen child. Having "effected
24 an entry" and established deep roots in the community, Mr. Xu is no longer "seeking
25 admission" in the same manner as a recently arrived alien at a port of entry.

26 47. Furthermore, because the BIA vacated Mr. Xu's prior removal order on November 4, 2025,
27 his legal posture has reverted to pending a decision on whether the [noncitizen] is to be
28 removed. Under long-standing Ninth Circuit precedent, detention authority for an individual

1 in this specific procedural posture—standing on U.S. soil with ongoing proceedings—rests
2 with § 1226(a). Therefore, any attempt to subject Mr. Xu to mandatory, bond-less detention
3 under § 1225(b) is a misapplication of the statute and a violation of his right to a custody
4 redetermination hearing.

5 **III. The "Effectuated Entry" Standard in the Southern District of California**

6 48. The Southern District of California, following well-settled Ninth Circuit authority,
7 recognizes a critical distinction between noncitizens apprehended at a port of entry and those
8 who have "effectuated an entry" by residing within the interior of the United States. While the
9 Government may attempt to categorize Petitioner as an "applicant for admission" under 8
10 U.S.C. § 1225(b), that classification applies only to those currently "taking active steps... to
11 seek lawful entry" at the border.

12 49. Petitioner, Mr. Xu, has lived openly and continuously in the United States for over three
13 years since February 2023. During this time, he has established profound community ties,
14 supported a one-year-old United States citizen child, and maintained a stable residence in
15 California. By living and working in the interior for an extended period, Mr. Xu has "effectuated
16 an entry" and is no longer "seeking admission" within the meaning of the mandatory
17 detention statutes.

18 50. In this District, judges have recently and definitively rejected the Government's attempt to
19 reclassify established interior residents as border-style "applicants for admission" subject to
20 bond-less detention. For example, in *Huan et al v. Noem et al*, 3:26-cv-00512-JLS-DEB, this
21 Court held that the mandatory detention mandate of § 1225(b)(2)(A) is narrow and
22 inapplicable to individuals who have resided in the community for years. For such
23 individuals, detention is governed by 8 U.S.C. § 1226(a), which provides for discretionary
24 detention and authorizes release on bond or conditional parole.

25 **IV. The Burden of Proof in Bond Hearings**

26 51. Under binding Ninth Circuit precedent, Respondents must bear the burden of proof to justify
27 Mr. Xu's continued detention without bond by clear and convincing evidence of flight risk
28 or danger to the community. See *Singh v. Holder*, 638 F.3d 1196, 1203 (9th Cir. 2011). In

1 Singh, the Ninth Circuit “determined that constitutional procedural due process required the
2 government to meet the clear and convincing burden of proof standard.” *Aleman Gonzalez*
3 *v. Barr*, 955 F.3d 762, 781 (9th Cir. 2020).

4 52. Because the Board of Immigration Appeals has remanded the family’s asylum case for
5 further proceedings (see BIA Decision at 2), Mr. Xu’s detention is governed by 8 U.S.C. §
6 1226(a). See *Casas-Castrillon v. Dep’t of Homeland Sec.*, 535 F.3d 942, 947–48 (9th Cir.
7 2008). Singh imposes upon Respondents the burden of proof both in a custody hearing
8 ordered under § 1226(a) and in a custody hearing ordered as a matter of due process. See
9 *Rajnish v. Jennings*, No. 3:20-cv-07819-WHO, 2020 WL 7626414, at *6 (N.D. Cal. Dec.
10 22, 2020); see also *Perera v. Jennings*, No. 21-cv-04136-BLF, 2021 WL 2400981, at *6
11 (N.D. Cal. June 11, 2021).

12 53. Further, due process requires two additional procedural protections in the bond hearing this
13 Court should order: that the adjudicator consider alternatives to detention, and that he or she
14 likewise consider Mr. Xu’s ability to pay bond. See *Hernandez v. Sessions*, 872 F.3d 976,
15 991–92 (9th Cir. 2017) (“Setting a bond amount without considering financial circumstances
16 or alternative conditions of release undermines the connection between the bond and the
17 legitimate purpose of ensuring the non-citizen’s presence at future hearings”); see also *Bell*
18 *v. Wolfish*, 441 U.S. 520, 538 (1979). Mr. Xu—who has no criminal history, strong family
19 ties in California (including a U.S. citizen child), and has lived and worked productively in
20 the United States for nearly three years—is entitled to these procedural protections before
21 any continued detention.

22 **FIRST CLAIM FOR RELIEF**
23 **Violation of the Immigration and Nationality Act (8 U.S.C. §§ 1225(b) and**
24 **1226(a))**

25 54. Petitioner incorporates by reference the allegations in the preceding paragraphs as if fully
26 set forth herein.

27 55. Under the plain language of the INA, the mandatory detention provision of § 1225(b)(2)(A)
28 applies only to noncitizens "seeking admission" who have not yet "effected an entry" into
the United States.

1 56. Because Petitioner has lived openly in the interior of the United States for nearly three years,
2 he has effected an entry and is no longer "seeking admission" within the meaning of the
3 statute.

4 57. Accordingly, Petitioner's detention is instead governed by 8 U.S.C. § 1226(a), which
5 provides for discretionary detention and authorizes release on bond or conditional parole.

6 58. By detaining Petitioner under the incorrect statutory authority and denying him a bond
7 hearing, Respondents have acted in violation of the INA.

8 **SECOND CLAIM FOR RELIEF**
9 **Violation of the Fifth Amendment Due Process Clause (Procedural Due**
10 **Process)**

11 59. Petitioner incorporates by reference the allegations in the preceding paragraphs as if fully
12 set forth herein.

13 60. The Fifth Amendment's Due Process Clause prohibits the government from depriving any
14 person of their liberty without due process of law.

15 61. Freedom from imprisonment lies at the heart of the liberty that the Due Process Clause
16 protects.

17 62. In this District, due process requires that a noncitizen who has established deep roots in the
18 community be afforded an individualized bond hearing to determine if their detention is
19 reasonably necessary to ensure their appearance or the safety of the community.

20 63. By re-detaining Petitioner without any change in circumstances or individualized finding of
21 risk, and by holding him without a bond hearing, Respondents have violated Petitioner's
22 procedural due process rights

23 **THIRD CLAIM FOR RELIEF**
24 **Violation of the Fifth Amendment Due Process Clause (Unlawful Burden of**
25 **Proof)**

26 64. Petitioner incorporates by reference the allegations in the preceding paragraphs as if fully
27 set forth herein.

28 65. Due process requires that when the government seeks to deprive an individual of their liberty
through civil detention, the government must bear the burden of justifying that detention.

1 66. Under the prevailing law of this District, Respondents must justify Petitioner's continued
2 detention by clear and convincing evidence that he is a flight risk or a danger to the
3 community.

4 67. Respondents have failed to meet this burden and have instead subjected Petitioner to
5 categorical, bond-less detention, thereby violating the Fifth Amendment

6 **PRAYER FOR RELIEF**

7 Wherefore, Petitioner respectfully requests this Court grant the following:

8 1) Grant the Writ of Habeas Corpus and assume jurisdiction over this matter;

9 2) Declare that Petitioner's detention is governed by 8 U.S.C. § 1226(a) and that his
10 detention under 8 U.S.C. § 1225(b) is unlawful and in violation of the Fifth Amendment's Due
11 Process Clause;

12 3) Issue a Writ of Habeas Corpus and order Respondents to immediately release Petitioner
13 from DHS custody under reasonable conditions and enjoin Respondents from re-arresting him
14 without a pre-deprivation hearing before this Court;

15 4) Alternatively, order that Petitioner be released within 7 days unless Respondents
16 schedule a hearing to take place before a neutral arbiter where to continue detention, the
17 government must establish by clear and convincing evidence that Petitioner presents a danger or
18 flight risk, and address why available conditions of supervision cannot mitigate any such risks;
19 and if (a) the government fails to meet this burden, the neutral arbiter orders Petitioner's release on
20 appropriate conditions of supervision, taking into account Petitioner's ability to pay a bond; or (b)
21 the government meets this burden, the neutral arbiter issue a reasoned decision explaining why the
22 government has met its burden of proof and why alternatives to detention are inadequate;

23 5) Direct Respondents to file a status report with this Court within ten (10) days certifying
24 whether a bond hearing was held and the outcome of said hearing;

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- 1 6) Enjoin Respondents from transferring Petitioner out of the District of Southern
2 California or from removing him from the United States while this Petition is pending;
3 7) Award Petitioner reasonable attorney's fees and costs pursuant to the Equal Access to
4 Justice Act (EAJA), 28 U.S.C. § 2412, and any other applicable law; and
5 8) Grant such other and further relief as this Court deems just and proper.
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8 Date: March 20, 2026

Respectfully Submitted,

9 VIP LAW GROUP, PC
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**VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF
PURSUANT TO 28 U.S.C. § 2242**

I am submitting this verification on behalf of the Petitioner because I am the Petitioner's attorney. I have discussed with the Petitioner the events described in this Petition. Based on those discussions, I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Date: March 20, 2026

/s/ Guofeng Li
Guofeng Li, Esq.