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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

Paulo Lage
(A )
Petitioner,

v.

Kristi Noem, Secretary, Department of
Homeland Security, (DHS);
Pam Bondi, Attorney General; Executive
Office For Immigration Review (EOIR);
Sirce Owen, Acting Director of EOIR;
Eloy Immigration Court;
Todd Lyons, Senior Official Performing
the Duties of Director of Immigration and
Customs Enforcement, (ICE); Christopher
McGregor, Acting Phoenix Field Office
Director, Eric Rokowsky, Warden Eloy
Detention Center,

Respondents.

Case No.:

**VERIFIED PETITION FOR
WRIT OF HABEAS CORPUS**

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

1 3. On November 29, 2023, Petitioner was ordered removed in Hyattsville,
2 Maryland. He reserved appeal. A timely appeal remains pending with the
3 Board of Immigration Appeals (BIA).

4 4. On September 26, 2025, Petitioner was apprehended by Immigration &
5 Customs Enforcement while making a withdrawal at his bank. Petitioner
6 remains detained at the Eloy Detention Center without the opportunity for
7 release on a bond. He was denied bond because Respondents now interpret
8 the INA to subject those inadmissible under 1182(a)(6)(A)(i) for having
9 entered the United States without admission or parole as being subject to
10 mandatory detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible
11 for release.
12

13 5. Petitioner sought a custody redetermination before an Immigration
14 Judge (IJ) at the Eloy Immigration Court but on March 17, 2026, the IJ denied
15 release based on lack of jurisdiction due to the new interpretation of the
16 statute. Petitioner's detention under this new interpretation violates the plain
17 language of the INA and the regulations.
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19 6. Subparagraph 1225(b)(2)(A) applies to individuals who are
20 apprehended on arrival in the United States. It states that an "applicant for
21 admission" who is "seeking admission" shall be detained for a removal
22 proceeding. *Id.* It does not apply to individuals like Petitioner, who are
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1 arrested and detained by ICE after having entered and begun residing in the
2 United States. Instead, such individuals are subject to a different statute, 8
3 U.S.C. § 1226(a), that allows for release on conditional parole or bond. That
4 statute expressly applies to people who, like Petitioner, are charged as
5 inadmissible for having entered the United States without admission or parole,
6 i.e. without inspection.
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9 7. Petitioner therefore requests this Court issue a writ of habeas corpus
10 and order the Respondents to provide Petitioner with a bond hearing that
11 allows him to show he is not a danger to the community nor a flight risk.
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14 JURISDICTION

15 8. Petitioner is in the physical custody of Respondents at the Eloy
16 Detention Center, in Eloy, Arizona and is under the direct control of
17 Respondents and their agents.
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19 9. This action arises under 28 U.S.C. § 2241 and the Immigration and
20 Nationality Act ("INA"), 8 U.S.C. §1101 *et seq.* and its implementing
21 regulations, the APA and the U.S. Constitution.
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23 10. Jurisdiction is proper under 28 U.S.C. § 2241 (habeas corpus) and 28
24 U.S.C. § 1331 (federal question), as the Petitioner is presently unlawfully
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1 detained under color of authority of the United States, and such custody is in
2 violation of the laws of the United States.

3 11. This Court may grant relief pursuant to 28 U.S.C. § 2241; the
4 Declaratory Judgment Act, 28 U.S.C. § 2201 et seq.; the APA, 5 U.S.C. §§
5 702, 706; the All-Writs Act, 28 U.S.C. § 1651; and the Court's inherent
6 equitable powers.
7

8 VENUE

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10 12. Venue is proper in this District under 28 U.S.C. § 1391, in that this is
11 an action against officers and agencies of the United States in their official
12 capacities, brought in the District where a substantial part of the events or
13 omissions giving rise to the Petitioner's claim occurred. Specifically, at least
14 one Defendant is in this District, the Petitioner is detained in this District, and
15 a substantial part of the events giving rise to the claims in this action took
16 place in this District.
17

18 PARTIES

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20 13. The Petitioner, Paulo Lage, is a 41-year-old undocumented immigrant
21 from Brazil who entered the United States on or about April 12, 2021, without
22 inspection. He is currently detained by Respondents at the Eloy Detention
23 Center. After he was arrested, ICE did not set bond and on March 17, 2026,
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1 the IJ at the Eloy Immigration Court denied bond for lack of jurisdiction, all
2 pursuant to agency's new interpretation of the immigration detention statutes.

3 14. Defendant Kristi Noem was the Secretary of the Department of
4 Homeland Security. She was responsible for the implementation and
5 enforcement of the INA, and oversees ICE, which is responsible for
6 Petitioner's detention. Respondent Noem has ultimate custodial authority over
7 Petitioner and is sued in her official capacity.
8
9

10 15. Respondent Department of Homeland Security (DHS) is the federal
11 agency responsible for implementing and enforcing the INA, including the
12 detention and removal of noncitizens.
13

14 16. Respondent Pamela Bondi is the Attorney General of the United States
15 and the most senior official in the U.S. Department of Justice ("DOJ"). She
16 has the authority to interpret the immigration laws and adjudicate removal
17 cases. The Attorney General delegates this responsibility to the Executive
18 Office for Immigration Review ("EOIR"). She is sued in her official
19 capacity.
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22 17. Respondent EOIR is the federal agency responsible for administering
23 the immigration courts and the Board of Immigration Appeals ("the Board").
24 The Immigration Courts adjudicate cases including custody redeterminations
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1 in bond hearings and the Board is the appellate body that reviews appeals from
2 the decisions of the immigration courts.

3 18. Respondent Sirce Owen is the Acting Director of EOIR and has
4 ultimate responsibility for overseeing the operation of the immigration courts
5 and the Board. She is sued in her official capacity

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7 19. The Eloy Immigration Court is the adjudicatory body within EOIR with
8 jurisdiction over the removal and bond cases of noncitizens detained in Eloy,
9 Arizona.

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11 20. Respondent Immigration and Customs Enforcement (ICE) is the
12 agency within DHS responsible for implementing and enforcing the INA,
13 including the detention and removal of noncitizens.

14
15 21. Respondent Christopher McGregor is the Acting Director of ICE and is
16 sued in his official capacity. He is responsible for Petitioner's detention.

17
18 22. Respondent Eric Rokowsky is the Warden of the Eloy Detention Center
19 is under the jurisdiction of the Phoenix Field Office and its director.

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21 **EXHAUSTION OF REMEDIES**

22 23. The Petitioner has exhausted his administrative remedies to the extent
23 required by law, and her only remedy is by way of this judicial action. He
24 requested a custody redetermination hearing before the IJ in Eloy, Arizona but
25 it was denied due to lack of jurisdiction. Appealing the denial would be futile
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1 in light of *Matter of Yajure-Hurtado*, 29 I&N Dec. 216 (BIA 2025) that held
2 that Immigration Judges lack authority to hear bond requests or to grant bond
3 to noncitizens who are present in the United States without admission.
4

5 6 STATEMENT OF FACTS

7 24. Petitioner is a married, native and citizen of Brazil who entered the
8 United States on or about April 12, 2021. On April 22, 2022, he married Aline
9 Marcia de Alvarenga in Maryland. Petitioner was placed in removal
10 proceedings with the filing of a Notice to Appear ("NTA"), charging him as
11 removable under INA § 212(a)(6)(A)(i) for being present in the United States
12 without being admitted or paroled.
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15 25. On September 26, 2025, Petitioner was apprehended by Immigration &
16 Customs Enforcement at his bank. Petitioner remains detained at the Eloy
17 Detention Center without the opportunity for release on a bond. He was denied
18 bond because Respondents now interpret the INA to subject those
19 inadmissible under 1182(a)(6)(A)(i) for having entered the United States
20 without admission or parole as being subject to mandatory detention under 8
21 U.S.C. § 1225(b)(2)(A) and therefore ineligible for release.
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24 26. Petitioner sought a custody redetermination before an Immigration
25 Judge (IJ) at the Eloy Immigration Court but on March 17, 2026, the IJ denied
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1 release based on lack of jurisdiction due to the new interpretation of the
2 statute. Petitioner's detention under this new interpretation violates the plain
3 language of the INA and the regulations.

4 **LEGAL FRAMEWORK**

5
6 27. The INA prescribes three basic forms of detention for the vast majority
7 of noncitizens in removal proceedings .

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9 28. First, 8 U.S.C. §1226 authorizes the detention of noncitizens in standard
10 removal proceedings before an IJ. *See* 8 U.S.C. § 1229a (describing removal
11 proceedings in general). Individuals in § 1226(a) detention are generally
12 entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§
13 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged
14 with, or convicted of certain crimes are subject to mandatory detention until
15 their removal proceedings are concluded, *see* 8 U.S.C. § 1226(c).

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18 29. Second, the INA provides for mandatory detention of certain recently
19 arrived noncitizens, namely those subject to expedited removal under 8 U.S.C.
20 § 1225(b)(1), and for other recent arrivals "seeking admission" under §
21 1225(b)(2). *See Jennings v. Rodriguez*, 583 U.S. 281, 287, 289, 138 S. Ct. 830
22 (2018) (explaining that § 1225(b)(2)'s mandatory detention scheme applies
23 "at the Nations' borders and ports of entry" to noncitizens "seeking admission
24 into the United States.").

1 30. Last, the INA also provides for detention of noncitizens who have
2 already been ordered removed, including individuals in withholding-only
3 proceedings. *See* 8 U.S.C. § 1231(a)-(b).

4 31. This case concerns the detention provisions at § 1226(a) and §
5 1225(b)(2).

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

12 33. Following the enactment of the IIRIRA, EOIR drafted new regulations
13 explaining that, in general, people who entered the country without inspection
14 were not considered detained under § 1225 and that they were instead detained
15 under § 1226(a). *See* Inspection and Expedited Removal of Aliens; Detention
16 and Removal of Aliens; Conduct of Removal Proceedings; Asylum
17 Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997) (“Despite being
18 applicants for admission, aliens who are present without having been admitted
19 or paroled (formerly referred to as aliens who entered without inspection) will
20 be eligible for bond and bond redetermination”).
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1 34. Thus, in the decades that followed, most people who entered without
2 inspection and were thereafter arrested and placed in standard removal
3 proceedings were considered for release on bond and also received bond
4 hearings before an IJ, unless their criminal history rendered them ineligible.
5 That practice was consistent with many more decades of prior practice, in
6 which noncitizens who had entered the United States, even if without
7 inspection, were entitled to a custody hearing before an IJ or other hearing
8 officer. In contrast, those who were stopped at the border were only entitled
9 to release on parole. *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No.
10 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply “restated” the
11 detention authority previously found at § 1252(a)).
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15 35. On May 22, 2025, the Board issued an unpublished decision holding
16 that all noncitizens who entered the United States without admission or parole,
17 i.e. without inspection, are considered applicants for admission, and are
18 therefore ineligible for IJ bond hearings under 8 U.S.C. § 1225(b)(2)(A).
19

20 36. On July 8, 2025, ICE issued “Interim Guidance Regarding Detention
21 Authority for Applicants for Admission” providing that all persons who
22 entered the United States without inspection shall now be deemed subject to
23 mandatory detention under § 1225(b)(2)(A). The policy applies regardless of
24 when a person is apprehended, and affects those who have resided in the
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1 United States for years or even decades. The new policy rejected the well-
2 established understanding of the statutory framework and reversed decades of
3 agency practice.

4
5 37. On September 5, 2025, the Board issued *Matter of Yajure Hurtado*, 29
6 I&N Dec. 216 (BIA 2025), wherein it held that Immigration Judges lack
7 authority to hear bond requests or to grant bond to noncitizens who are present
8 in the United States without inspection.

9
10 38. Respondents' reinterpretation of the detention provision at § 1225(b)(2)
11 that subjects noncitizens like Petitioner to mandatory detention without bond
12 under § 1225(b)(2) rather than being eligible for bond under § 1226(a) has
13 already been rejected by several federal courts. For example, after IJs in the
14 Tacoma, Washington immigration court stopped providing bond hearings for
15 people who entered the United States without inspection and who have since
16 resided here, the U.S. District Court in the Western District of Washington
17 found that such a reading of the INA is likely unlawful and that § 1226(a), not
18 § 1225(b), applies to noncitizens who are not apprehended upon arrival to the
19 United States. *Rodriguez Vazquez v. Bostock*, No. 3:25-CV-05240-TMC, ---
20 F. Supp. 3d ---, 2025 WL 1193850 (W.D. Wash. Apr. 24, 2025) (granting
21 preliminary injunction). *See also Gomes v. Hyde*, No. 1:25-CV-11571-JEK,
22 2025 WL 1869299, at *8 (D. Mass. July 7, 2025) (granting habeas petition
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1 based on same conclusion); *Martinez v. Hyde*, No. CV 25-11613-BEM, 2025
2 WL 2084238, at *8 (D. Mass. July 24, 2025) (finding detention unlawful
3 based on same conclusion); Order, *Bautista et al. v. Santacruz Jr. et al.*, No.
4 5:25-CV-1873-BFM (C.D. Cal. July 28, 2025), Dkt. 14 at *7-8 (granting
5 temporary restraining order based on same conclusion); Opinion & Order,
6 *Benitez v. Francis*, No. 1:25-CV5937-DEH (S.D.N.Y. August 8, 2025), Dkt.
7 14 at *10-18, 31 (granting habeas petition and directly ordering release from
8 custody based on same conclusion).
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11 39. Respondents' reinterpretation of the INA is not in accord with plain text
12 of the statutory provisions. As the *Rodriguez-Vazquez* court and other courts
13 explained, the plain text of the statutory provisions demonstrates that §
14 1226(a), not § 1225(b), applies to people like Petitioner who are present in the
15 United States without being admitted or paroled but have resided in this
16 country for years and even decades.
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19 40. Section 1226(a) applies by default to all persons "pending a decision
20 on whether the [noncitizen] is to be removed from the United States." These
21 removal hearings are held under § 1229a, to "decid[e] the inadmissibility or
22 deportability of a[] [noncitizen]." 8 U.S.C. § 1229a(a)(1).
23

24 41. The text of §1226 also explicitly applies to people charged as being
25 inadmissible, including those who entered without inspection. *See* 8 U.S.C. §
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1 1226(c)(1)(E). This year, Congress enacted the Laken Riley Act that added
2 subparagraph (E) to section 1226(c). Subparagraph (E) excludes certain
3 noncitizens who entered without inspection under § 1182(a)(6)(A) from §
4 1226(a)'s default bond provision if in addition to being present without being
5 admitted or paroled the noncitizen "is charged with, is arrested for, is
6 convicted of, admits having committed, or admits committing acts which
7 constitute the essential elements or any burglary, theft, larceny, shoplifting, or
8 assault of a law enforcement officer offense..." 8 U.S.C. § 1226(c)(1)(E)(i)
9 and (ii). Subparagraph (E)'s reference to persons inadmissible under §
10 1182(6)(A), i.e., persons inadmissible for being present without being
11 admitted or paroled, makes clear that, by default, such people are afforded a
12 bond hearing under subsection (a). As the *Rodriguez Vazquez* court explained,
13 "[w]hen Congress creates "specific exceptions" to a statute's applicability, it
14 "proves" that absent those exceptions, the statute generally applies. *Rodriguez*
15 *Vazquez*, 2025 WL 1193850, at *12 (citing *Shady Grove Orthopedic Assocs.,*
16 *P.A. v. Allstate Ins. Co.*, 559 U.S. 393, 400 (2010)). Section 1226 therefore
17 leaves no doubt that it applies to people who face charges of being
18 inadmissible to the United States, including those who are present without
19 admission or parole.
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1 42. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry
2 or who very recently entered the United States. The statute's entire framework
3 is premised on inspections at the border of people who are "seeking
4 admission" to the United States. 8 U.S.C. § 1225(b)(2)(A); *see also Diaz*
5 *Martinez*, 2025 WL 2084238, at *8 ("[O]ur immigration laws have long
6 made a distinction between those [noncitizens] who have come to our shores
7 seeking admission . . . and those who are within the United States after an
8 entry, irrespective of its legality." (quoting *Leng May Ma v. Barber*, 357 U.S.
9 185, 187 (1958))). Indeed, the Supreme Court has explained that this
10 mandatory detention scheme applies "at the Nation's borders and ports of
11 entry, where the Government must determine whether a[] [noncitizen] seeking
12 to enter the country is admissible." *Jennings v. Rodriguez*, 583 U.S. at 287.

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14 43. Accordingly, the mandatory detention provision of § 1225(b)(2) does
15 not apply to people like Petitioner, who has already entered and was residing
16 in the United States for 5 years at the time he was apprehended.
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18 **CLAIMS FOR RELIEF**

19 **FIRST CLAIM FOR RELIEF** 20 **VIOLATION OF 8 U.S.C. § 1226(a)**

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22 44. Petitioner re-alleges and incorporates by reference the paragraphs
23 above.
24

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26 45. The Petitioner is being detained in violation of law where he has been

1 unlawfully denied release on bond.

2 46. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not
3 apply to all noncitizens residing in the United States who are subject to the
4 grounds of inadmissibility. As relevant here, it does not apply to those who
5 previously entered the country and have been residing in the United States
6 prior to being apprehended and placed in removal proceedings by
7 Respondents. Such noncitizens are detained under § 1226(a) and are eligible
8 for release on bond, unless they are subject to § 1225(b)(1), § 1226(c), or §
9 1231.
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12 47. Nonetheless, Respondents including DHS, ICE, and EOIR have
13 reinterpreted § 1225(b)(2) to apply to noncitizens who are present in the
14 United States without admission or parole, like Petitioner, pursuant to the
15 Board's precedent decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216
16 (BIA 2025) and ICE's July 8, 2025 "Interim Guidance Regarding Detention
17 Authority for Applicants for Admission."
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20 48. The unlawful application of § 1225(b)(2) to Petitioner mandating his
21 continued detention violates the INA.
22

23 **SECOND CLAIM FOR RELIEF**
24 **VIOLATION OF THE REGULATIONS**
25 **8 C.F.R. §§ 236.1, 1236.1, and 1003.19**
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1 49. Petitioner re-alleges and incorporates by reference the paragraphs
2 above.

3 50. In 1997, after Congress amended the INA through IIRIRA, EOIR and
4 the then-Immigration and Naturalization Service issued an interim rule to
5 interpret and apply IIRIRA. Specifically, under the heading "Apprehension,
6 Custody, and Detention of [Noncitizens]," the agencies explained that
7 "[d]espite being applicants for admission, [noncitizens] who are present
8 without having been admitted or paroled (formerly referred to as [noncitizens]
9 who entered without inspection) *will be eligible for bond and bond*
10 *redetermination.*" 62 Fed. Reg. at 10323 (emphasis added). The agencies thus
11 made clear that individuals who had entered without inspection were eligible
12 for consideration for bond and bond hearings before IJs under 8 U.S.C. § 1226
13 and its implementing regulations.

14 51. Nonetheless, Respondents have reinterpreted sections 1226(a) and
15 1225(b)(2) to apply to Petitioner who is present in the United States without
16 being admitted or paroled.

17 52. The application of § 1225(b)(2) to the Petitioner unlawfully mandates
18 her continued detention and violates 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

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25 **THIRD CLAIM FOR RELIEF**
26 **VIOLATION OF THE ADMINISTRATIVE PROCEDURES ACT**

1 53. Petitioner re-alleges and incorporates by reference the paragraphs
2 above.

3 54. The APA provides that a “reviewing court shall . . . hold unlawful and
4 set aside agency action, findings, and conclusions found to be arbitrary and
5 capricious, an abuse of discretion, or otherwise not in accordance with law.”
6

7 5 U.S.C. § 706(2)(A).
8

9 55. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not
10 apply to all noncitizens residing in the United States who are subject to the
11 grounds of inadmissibility. As relevant here, it does not apply to those who
12 previously entered the country and have been residing in the United States
13 prior to being apprehended and placed in removal proceedings by
14 Respondents. Such noncitizens are detained under § 1226(a) and are eligible
15 for release on bond, unless they are subject to § 1225(b)(1), § 1226(c), or §
16 1231.
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19 56. Nonetheless, Respondents have reinterpreted the relevant statutes so as to
20 apply § 1225(b)(2) to bond eligible noncitizens like the Petitioner.
21

22 57. Moreover, Respondents new interpretation of the statute is a change to
23 decades of law and practice by the ICE, DHS, and EOIR. Respondents have
24 failed to articulate reasoned explanations for their decisions, have considered
25 factors that Congress did not intend to be considered; have entirely failed to
26

1 consider important aspects of the problem; and have offered explanations for
2 their decisions that run counter to the evidence before the agencies.

3 58. The application of § 1225(b)(2) to Petitioner is arbitrary, capricious,
4 and not in accordance with law, and as such, it violates the APA. *See* 5 U.S.C.
5 § 706(2).
6

7 **FOURTH CLAIM FOR RELIEF**
8 **VIOLATION OF FIFTH AMENDMENT DUE PROCESS CLAUSE**
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10 59. Petitioner re-alleges and incorporates by reference the paragraphs
11 above.

12 60. The Due Process Clause of the Fifth Amendment forbids the
13 government from depriving any “person” of liberty “without due process of
14 law.” U.S. CONST. Amend. V. “Freedom from imprisonment—from
15 government custody, detention, or other forms of physical restraint—lies at
16 the heart of the liberty that Clause protects. *Zadvydas v. Davis*, 533 U.S. 678,
17 690 (2001).
18

19 61. “[T]he Due Process Clause applies to all ‘persons’ within the United
20 States, including [noncitizens], whether their presence here is lawful,
21 unlawful, temporary, or permanent.” *Zadvydas v. Davis*, 533 U.S. at 693.
22

23 62. Respondents’ mandatory detention of Petitioner without consideration
24 for release on bond violates his due process rights.
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PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

- 1) Assume jurisdiction over this matter;
- 2) Determine that Respondents' reinterpretation of sections 1225(b)(2) and 1226(a) so as to deny consideration of bond to Petitioner on the basis of section 1225(b)(2) violates the INA, its implementing regulations, the APA, and the Due Process Clause;
- 3) Issue a Writ of Habeas Corpus requiring Respondents release Petitioner pursuant to 8 U.S.C. § 1226(a) or the Due Process Clause
- 4) Award Petitioner her costs and reasonable attorneys' fees in this action as provided for by the Equal Access to Justice Act, 28 U.S.C. § 2412, other statute; and
- 5) Grant such further relief as the Court deems just and proper.

Dated: March 23rd, 20256

Respectfully submitted,

/s/ Lewis R. Gilbreath
Lewis R. Gilbreath
Attorney for Petitioner
Paulo Lage

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VERIFICATION

I, Lewis R. Gilbreath, hereby declare under penalty of perjury of the laws of the State of Arizona and the United States that the facts alleged in the foregoing Verified Petition for a Writ of Habeas Corpus are to the best of my knowledge true and correct.

Executed on this 23rd day of March, 2026 in Phoenix, Arizona.

/s/ Lewis R. Gilbreath
Lewis R. Gilbreath
Attorney for Petitioner
Paulo Lage

CERTIFICATE OF SERVICE

I hereby certify that on the 23rd of **March 2026** I caused to be delivered by electronic delivery, a copy of the foregoing PETITION FOR A WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 to:

Timothy Courchaine, U.S. Attorney
United States Attorney's Office for the District of Arizona
Two Renaissance Square 40 N. Central Avenue,
Suite 1800
Phoenix, AZ 85004-4408

/s/ Lewis R. Gilbreath
Lewis R. Gilbreath
Attorney for Petitioner

I hereby certify that on the 23rd of **March 2026** I caused to be delivered by U.S. Certified Mail, Return Receipt Requested, a copy of the foregoing PETITION FOR A WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 to:

Kriti Noem, Secretary of Homeland Security
U.S. Department of Homeland Security
Washington, D.C. 20528

Pamela Bondi, Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

Sirce Owen, Acting Director of EOIR
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

1 Todd Lyons, Senior Official
2 Performing Duties of Director of ICE
3 U.S. Department of Homeland Security/ICE
4 Washington, D.C. 20528

5 Christopher McGregor, Acting Field Office Director
6 Department of Homeland Security
7 Immigration & Customs Enforcement
8 Office of Detention and Removal
9 2035 N. Central Ave
10 Phoenix, Arizona 85004

11 Eric Rokowsky, Warden
12 Eloy Detention Center
13 1705 E Hanna Road
14 Eloy, AZ 85131
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