

1 **ZANDRA L. LOPEZ**
California State Bar No. 216567
2 **FEDERAL DEFENDERS OF SAN DIEGO, INC.**
3 225 Broadway, Suite 900
San Diego, California 92101-5030
4 Telephone: (619) 234-8467
Facsimile: (619) 687-2666
5 Zandra_Lopez@fd.org
6 Counsel for Mr. Simon Juan
7

8 UNITED STATES DISTRICT COURT
9 SOUTHERN DISTRICT OF CALIFORNIA
10

11 PEDRO SIMON JUAN,
12
13 Petitioner,

14 v.

15 MARKWAYNE MULLIN, Secretary of
the Department of Homeland Security,
16 TODD BLANCHE, Acting Attorney
General, TODD M. LYONS, Acting
17 Director, Immigration and Customs
Enforcement, JESUS ROCHA, Acting
18 Field Office Director, San Diego Field
Office, CHRISTOPHER LAROSE,
19 Warden at Otay Mesa Detention Center,
20
21 Respondents.

CASE NO.: 26-cv-2237-AGS-MMP

**First Amended Petition for Writ of
Habeas Corpus**

**[Civil Immigration Habeas Petition
Under 28 U.S.C. § 2241]**

1 INTRODUCTION

2 Mr. Simon Juan was born in Guatemala. In 2018, he entered the United States
3 with his wife and his then one year old son. The family was *allowed into the*
4 *country under parole*. For the past six or seven years, Mr. Simon Juan has been
5 living in Escondido, working as a gardener and providing for his family.

6 In September of 2023, he appealed an immigration judge’s denial of his
7 asylum claim. After that, Mr. Simon Juan continued to do his monthly check-ins
8 with Immigration and Customs Enforcement (ICE).

9 On July 9, 2025, he was detained at one of his ICE check-ins. He was not
10 given proper notice and he did not get an opportunity to contest his detention. More
11 than nine months after his detention, Mr. Simon Juan remains detained at Otay
12 Mesa Detention Center.

13 Mr. Simon Juan’s re-detention violates his regulatory and due process rights.
14 Specifically, while it is unclear whether the government has formally revoked
15 Mr. Simon Juan’s parole, the government’s actions are unlawful regardless. If the
16 agency did not revoke his parole, then it violated that parole by detaining him. And
17 if the agency *did* revoke his parole, then it did so in violation of the statute and
18 regulations, which require written notification and a determination that the purposes
19 of the parole have been served, as well as the Constitution, which requires pre-
20 deprivation notice and hearing. Either way, the agency’s actions violated the
21 Administrative Procedures Act and the Due Process Clause.

22 This Court should grant *immediate release* as this Court has done in the past.
23 *Zheng v. LaRose*, No. 26-CV-2006-AGS-JLB, 2026 WL 939481, at *1 (S.D. Cal.
24 Apr. 7, 2026) (ordering immediate release).

25 STATEMENT OF FACTS

26 Mr. Simon Juan is a Guatemalan national who entered the United States with
27 his wife and one year old son in 2018. Exhibit A, Declaration of Simon Juan at
28 ¶¶ 1–2. He and his family were paroled into the country. *Id.* at ¶ 1.

1 Mr. Simon Juan integrated himself into the community. He worked as a
2 gardener and lived in Escondido California with his family for approximately seven
3 years. *Id.* at ¶ 3.

4 In 2023, an immigration judge denied his asylum claim. *Id.* at ¶ 2. Mr. Simon
5 Juan filed a timely appeal, which remains pending. *Id.*

6 Since 2023, Mr. Simon Juan regularly reports to ICE. He reported to ICE
7 once a month, with alternating visits in his home and the ICE offices. *Id.* at ¶ 4.
8 Every Friday, he reported through the computer, providing ICE with identifying
9 information. *Id.*

10 On July 9, 2025, Mr. Simon Juan reported to a monthly check in. *Id.* at ¶ 6.
11 He was arrested without notice or an opportunity to contest his detention. *Id.* He
12 has now been detained for over nine months.

13 LEGAL BACKGROUND

14 This Court should grant this petition by ordering Mr. Simon Juan's
15 immediate release.

16 **I. Revoking Mr. Simon Juan's release and subjecting him to detention** 17 **violates the Administrative Procedures Act and Due Process.**

18 **A. The government's actions violated the Administrative** 19 **Procedures Act.**

20 The INA "establishes the framework governing noncitizens' entry into and
21 removal from the United States, with regulations promulgated by the enforcing
22 agencies providing further governance." *Y-Z-L-H v. Bostock*, 792 F. Supp. 3d 1123,
23 1132 (D. Or. 2025). "Noncitizens who arrive at a port of entry without a visa or
24 other entry document, like Petitioner, are deemed 'inadmissible' under 8 U.S.C.
25 § 1182(a)(7)" due to their lack of entry documents. *Id.* at 1132 & n.7 (noting that
26 "[d]epending on the circumstances, other categories of inadmissibility may also
27 apply, but § 1182(a)(7) applies for noncitizens without proper documentation").
28 Once a noncitizen is deemed inadmissible, "the immigration officer must order the
noncitizen's removal unless the noncitizen indicates an intention to apply for

1 asylum or fear of prosecution.” *Id.* (citing 8 U.S.C. § 1225(b)(1)(A)(i)). The
2 government may place the noncitizen into expedited removal proceedings, *see*
3 8 U.S.C. § 1225(b)(1), or the government may place the noncitizen into regular
4 removal proceedings under 8 U.S.C. § 1229(a). *See Y-Z-L-H*, 792 F. Supp. 3d at
5 1132–33 (citing 8 U.S.C. § 1225(b)(2)).

6 Section § 1225(b)(2)(A) provides that “in the case of an alien who is an
7 applicant for admission, if the examining immigration officer determines that an
8 alien seeking admission is not clearly and beyond a doubt entitled to be admitted,
9 the alien shall be detained for a proceeding under section 1229a of this title.”
10 8 U.S.C. § 1225(b)(2)(A). However, “applicants for admission may be temporarily
11 released on parole [into the United States] ‘for urgent humanitarian reasons or
12 significant public benefit,’ as set forth in 8 U.S.C. § 1182(d)(5)(A). *Jennings v.*
13 *Rodriguez*, 583 U.S. 281, 288 (2018) (quoting 8 U.S.C. § 1182(d)(5)(A)). The
14 decision to grant parole pursuant to 8 U.S.C. § 1182(d)(5)(A) is determined “on a
15 case-by-case basis.” 8 U.S.C. § 1182(d)(5)(A). Then, “when the purpose of the
16 parole has been served,” § 1182(d)(5)(A) provides that “the alien shall forthwith
17 return or be returned to the custody from which he was paroled and thereafter his
18 case shall continue to be dealt with in the same manner as that of any other applicant
19 for admission to the United States.” *Jennings*, 583 U.S. at 288 (quoting 8 U.S.C.
20 § 1182(d)(5)(A)).

21 To terminate the previously granted parole, the agency must comply with the
22 applicable regulatory and statutory requirements. As set forth in 8 C.F.R.
23 § 212.5(e)(2)(i), which governs the “[t]ermination of parole,”

24 In cases not covered by paragraph (e)(1) of this section,³ upon
25 accomplishment of the purpose for which parole was authorized or
26 when in the opinion of one of the officials listed in paragraph (a) of
27 this section, neither humanitarian reasons nor public benefit
28 warrants the continued presence of the alien in the United States,
parole shall be terminated upon written notice to the alien and he or she shall be restored to the status that he or she had at the time of parole.

1 8 C.F.R. § 212.5(e)(2)(i). That is, “[u]nder the governing regulation,
2 [§ 1182(d)(5)(A)] parole may be terminated only if the purpose of parole is
3 accomplished, or humanitarian reasons and the public benefit no longer warrant
4 parole.” *Loaiza Arias v. LaRose*, No. 3:25-cv-02595-BTM-MMP, 2025 WL
5 3295385, at *3 (S.D. Cal. Nov. 25, 2025) (citing 8 C.F.R. § 212.5(e)).

6 What’s more, ICE is required to inform noncitizens of the reasons for
7 revocation. The court in *Y-Z-H-L* determined that under the Administrative
8 Procedure Act, immigration parolees are entitled to determinations related to their
9 parole revocations that are not arbitrary, capricious or an abuse of discretion. *Y-Z-*
10 *L-H*, 792 F. Supp. 3d at 1144. An agency acts arbitrarily and capriciously by failing
11 to make a reasoned determination or where the agency fails to “articulate[] a
12 satisfactory explanation for its action including a rational connection between the
13 facts found and the choice made.” *Id.* Parole revocations in the context of the INA
14 must occur on a case-by-case basis and may occur “when the purposes of such
15 parole shall, in the opinion of the Secretary of Homeland Security, have been served
16 the alien shall forthwith return or be returned to the custody from which he was
17 paroled.” *Id.* (quoting 8 C.F.R. § 212.5(e)). 8 C.F.R. § 212.5(e) requires written
18 notice of the termination of parole except where the immigrant has departed or
19 when the specified period of parole has expired.

20 The government has failed to follow the applicable statutory and regulatory
21 provisions to terminate Petitioner’s parole. *Cf. Coal. for Humane Immigrant Rts. v.*
22 *Noem*, No. 25-cv-872 (JMC), 2025 WL 2192986, at *2 (D.D.C. Aug. 1, 2025)
23 (holding that the government failed to follow the applicable statutory and regulatory
24 provisions and that paroled noncitizens cannot be subject to expedited removal
25 proceedings); *Salgado Bustos v. Raycraft*, No. 25-13202, 2025 WL 3022294, at *5–
26 7 (E.D. Mich. Oct. 29, 2025) (same); *E.V. v. Raycraft*, No. 4:25-cv-2069, 2025 WL
27 2938594, at *10 (N.D. Ohio Oct. 16, 2025) (same).

28

1 First, the statute at 8 U.S.C. §1182(d)(5)(A) permits the termination of parole
2 only where there is a finding that the purpose of such parole has been served. *Y-Z-*
3 *L-H*, 792 F. Supp. 3d at 1133. Here, however, the purpose of Petitioner’s parole has
4 not been served. He fled from Venezuela, seeking asylum in the United States, and
5 he entered the United States through the CBP One application. Exh. A ¶¶ 1–2. At
6 that time, Mr. Simon Juan was granted release pursuant to 8 U.S.C.
7 § 1182(d)(5)(A), which provides for parole into the United States “for urgent
8 humanitarian reasons or significant public benefit.” 8 U.S.C. § 1182(d)(5)(A). He
9 filed an asylum application and he had court before an immigration judge less than
10 a month from the date of his arrest. Moreover, now that he has been detained, he is
11 appealing the immigration court’s decision. Thus, the purpose of parole has not yet
12 been served. *Perez Bueno v. Janecka*, No. 5:25-CV-03376-CAS-BFM, 2026 WL
13 309934, at *1 (C.D. Cal. Feb. 5, 2026) (granting habeas noting asylum remains
14 pending when on appeal prior to detention); *Velasquez-Chinga v. Noem*, No. 3:26-
15 CV-00105-RBM-KSC, 2026 WL 311507, at *1 (S.D. Cal. Feb. 5, 2026) (same)

16 Second, ICE is required to provide the noncitizen “a cogent description of
17 the reasons supporting the revocation decision.” *J.E.H.G. v. Chestnut*, No. 1:25-
18 CV-01673-JLT SKO, 2025 WL 3523108, at *6 (E.D. Cal. Dec. 9, 2025). In *Y-Z-H-*
19 *L*, the Petitioner received an email stating that “DHS was exercising its discretion”
20 to terminate parole. 792 F. Supp. 3d at 1146. The court said that this language was
21 vague and did not provide an actual reason. *Id.* It stated that the “email was legally
22 insufficient to meet the statutory and regulatory requirements, even though it cited
23 those provisions and invoked the word ‘discretion.’” *Id.* Common sense and the
24 words of the statute require parole revocation to be analyzed on a case-by-case basis
25 and that a decision to revoke parole “must attend to the reasons an individual
26 [noncitizen] received parole.” *J.E.H.G.*, 2025 WL 3523108, at *6 (citing *Mata*
27 *Velasquez v. Kurzdorfer*, No. 25-CV-493-LJV, 2025 WL 1953796, at *11
28 (W.D.N.Y. July 16, 2025)). There is no indication that the government conducted

1 that analysis in this case.

2 Judge Curiel found an APA violation in *Noori v. LaRose*, No. 25-CV-1824-
3 GPC-MSB, 2025 WL 2800149 (S.D. Cal. Oct. 1, 2025). *Noori* concluded that “to
4 meet statutory and regulatory requirements, revocation should only occur when (1)
5 the parole’s purpose is served or (2) when humanitarian reasons and public benefit
6 are no longer warranted, and the noncitizen is provided written notice.” *Id.* The first
7 requirement was not met because the petitioner “applied for asylum and was still in
8 the middle of those proceedings when Respondents issued and executed the
9 revocation.” *Id.* And even though the petitioner was provided a “generic
10 notification” of his revocation, the second requirement was not met because
11 “humanitarian reasons still warrant the Petitioner’s presence in the country.” *Id.* at
12 a minimum, Judge Curiel held, parole revocation “requires an individualized
13 determination,” which the government had not provided because it failed to explain
14 “why the Petitioner would now be considered a flight risk or danger to the
15 community.” *Id.*

16 Here, as in *Noori*, the government failed to meet the statutory and
17 regulatory requirements for parole revocation. Thus, the government here “has
18 acted arbitrarily and capriciously in violation of the APA.” *Id.*

19 **B. Mr. Simon Juan’s detention is a violation of the Due Process**
20 **Clause.**

21 The Due Process Clause of the Fifth Amendment forbids the government
22 from depriving any person of liberty without due process of law. U.S. Const.
23 amend. V. “Freedom from imprisonment—from government custody, detention, or
24 other forms of physical restraint—lies at the heart of the liberty” that the Due
25 Process Clause protects. *Zadvydas*, 533 U.S. at 690 (citing *Foucha v. Louisiana*,
26 504 U.S. 71, 80 (1992)).

27 An individual released from immigration custody has a constitutionally
28 protected liberty interest in remaining free from detention. *Morrissey v. Brewer*,

1 408 U.S. 471, 482, 92 S. Ct. 2593, 2601, 33 L. Ed. 2d 484 (1972); *see also Sanchez*
2 *v. LaRose*, 25-cv-2396; 2025 WL 2770629, at * 3 (S.D. Cal.). Thus, Petitioner has
3 a fundamental interest in liberty and being free from official restraint.

4 “Even when ICE has the initial discretion to detain or release a noncitizen
5 pending removal proceedings, after that individual is released from custody [he]
6 has a protected liberty interest in remaining out of custody.” *Pinchi v. Noem*, 792
7 F. Supp. 3d 1025, 1032 (N.D. Cal. 2025). (internal citation omitted). Thus, the
8 liberty interest applies to individuals who are paroled into the United States and
9 released to attend removal proceedings. *Garcia v. Andrews*, No. 1:25-CV-01006
10 JLT SAB, 2025 WL 2420068, at *11 (E.D. Cal. Aug. 21, 2025); *Valencia Zapata*
11 *v. Kaiser*, No. 25-CV-07492-RFL, 2025 WL 2578207, at *3 (N.D. Cal. Sept. 5,
12 2025); *Y-Z-L-H v. Bostock*, No. 3:25-CV-965-SI, 2025 WL 1898025, at *13 (D. Or.
13 July 9, 2025).

14 To determine which procedures are constitutionally sufficient to satisfy the
15 Due Process Clause, the Court must apply the *Matthews* factors. *See Matthews*, 424
16 U.S. at 335. Courts must consider: (1) “the private interest that will be affected by
17 the official action”; (2) “the risk of an erroneous deprivation of such interest
18 through the procedures used, and the probable value, if any, of additional or
19 substitute procedural safeguards”; and (3) “the Government’s interest, including the
20 function involved and the fiscal and administrative burdens that the additional or
21 substitute procedural requirement would entail.” *Id.*

22 All three factors support a finding that the government’s revocation of
23 Mr. Simon Juan’s release without reasoning or an opportunity to be heard, denied
24 Petitioner of his due process rights. First, Mr. Simon Juan has a significant liberty
25 interest in remaining out of custody pursuant to his conditional parole. “Freedom
26 from imprisonment—from government custody, detention, or other forms of
27 physical restraint—lies at the heart of the liberty [the Due Process Clause]
28 protects.” *Zadvydas*, 533 U.S. at 690. He also has an interest in remaining with his

1 family and continuing the process of adjusting status to a lawful permanent resident
2 and asylum. *See Morrissey*, 408 U.S. 471 at 482 (“Subject to the conditions of his
3 parole, he can be gainfully employed and is free to be with family and friends and
4 to form the other enduring attachments of normal life.”).

5 Second, the risk of an erroneous deprivation of such interest is high as
6 Mr. Simon Juan parole was revoked without providing him a reason for revocation
7 or giving him an opportunity to be heard. When he was paroled, the government
8 made a finding that he did not pose a danger to the community and was not a flight
9 risk. *Saravia v. Sessions*, 280 F. Supp. 3d 1168, 1760 (N.D. Cal. 2017) (“Release
10 reflects a determination by the government that the noncitizen is not a danger to the
11 community or a flight risk.”). “Once a noncitizen has been released, the law
12 prohibits federal agents from rearresting him merely because he is subject to
13 removal proceedings.” *Saravia*, 280 F. Supp. 3d at 1760. “Rather, the federal agents
14 must be able to present evidence of materially changed circumstances—namely,
15 evidence that the noncitizen is in fact dangerous or has become a flight risk”
16 *Id.* “Where, as here, ‘the petitioner has not received any bond or custody hearing,’
17 ‘the risk of an erroneous deprivation of liberty is high’ because neither the
18 government nor [Petitioner] has had an opportunity to determine whether there is
19 any valid basis for [his] detention.” *Pinchi*, 2025 WL 2084921, at *5 (quoting *Singh*
20 *v. Andrews*, No. 25-cv-801-KES-SKO (HC), 2025 WL 1918679, at *7 (E.D. Cal.
21 July 11, 2025)) (cleaned up).

22 Third, the Government’s interest in detaining Mr. Simon Juan without proper
23 notice and reasoning or a hearing is “low.” *See Pinchi*, 2025 WL 2084921, at *5;
24 *Matute*, 2025 WL 2817795, at *6; *Ortega v. Bonnar*, 415 F. Supp. 3d 963, 970
25 (N.D. Cal. Nov. 22, 2019) (“If the government wishes to re-arrest [Petitioner] at
26 any point, it has the power to take steps toward doing so; but its interest in doing so
27 without a hearing is low.”).

28

1 Thus, Mr. Simon Juan’s detention is unlawful. *See, e.g., Alegria Palma v.*
2 *Larose et al.*, No. 25-cv-1942 BJC (MMP), slip op. at 14 (S.D. Cal. Aug. 11, 2025)
3 (granting a TRO based on a procedural due process challenge to a revocation of
4 parole without a pre-deprivation hearing); *Navarro Sanchez*, 2025 WL 2770629, at
5 *5 (granting a writ of habeas corpus releasing petitioner from custody to the
6 conditions of her preexisting parole on due process grounds).

7 **II. This Court has jurisdiction to consider Mr. Simon Juan’s claim.**

8 In cases raising similar claims, the government has argued that this Court
9 lacks jurisdiction to consider or grant relief under 8 U.S.C. §§ 1252(g) and
10 1252(b)(9). This argument fails here for at least three independent reasons. First,
11 Mr. Simon Juan’s claims are inextricably intertwined with the government’s
12 authority to detain him, which this Court has jurisdiction to consider. Second, this
13 Court has jurisdiction to review whether the agency has complied with due process
14 and its mandatory, nondiscretionary duties.

15 Courts have jurisdiction to “decide a purely legal question that does not
16 challenge the Attorney General’s discretionary authority.” *Ibarra-Perez v. United*
17 *States*, 154 F.4th 989, 996 (9th Cir. 2025) (quotations omitted). In *Ibarra-Perez*,
18 the Ninth Circuit squarely held that “§ 1252(g) does not prohibit challenges to
19 unlawful practices merely because they are in some fashion connected to removal
20 orders.” *Id.* at 997. Accordingly, the question is whether Petitioner’s claim
21 “challenge[s] the Attorney General’s discretionary authority.” *Id.* at 996.

22 They do not. First, Petitioner claim relates to the government’s authority to
23 detain him, and courts have widely held that review of issues related to detention is
24 not barred by § 1252(g) or (b)(9). *See, e.g., Flores-Torres v. Mukasey*, 548 F.3d
25 708, 711 (9th Cir. 2008) (holding that habeas jurisdiction exists to review a
26 challenge to immigration detention based on a citizenship claim); *Kong v. United*
27 *States*, 62 F.4th 608, 617 (1st Cir. 2023) (holding that “assertions of illegal
28 detention [were] plainly collateral to ICE’s prosecutorial decision to execute [a

1 detainee’s removal” and thus not subject to § 1252’s jurisdictional bars); *Cardoso*
2 *v. Reno*, 216 F.3d 512, 516 (5th Cir. 2000) (“[S]ection 1252(g) does not bar courts
3 from reviewing an alien detention order[.]”); *Parra v. Perryman*, 172 F.3d 954, 957
4 (7th Cir. 1999) (§ 1252(g) did not apply to a “claim concern[ing] detention”). To
5 undersigned counsel’s knowledge, every judge in this district has held that it has
6 jurisdiction to consider claims that an individual is unlawfully detained. Petitioner’s
7 claim asserts in his habeas petition relate to the government’s authority to detain
8 him without following the regulations and statues relating to parole.

9 Second, the jurisdictional bars of § 1252 do not bar review of claims that ICE
10 is “failing to carry out non-discretionary statutory duties and provide due process.”
11 *J.R. v. Bostock*, No. 2:25-CV-01161-JNW, 2025 WL 1810210, at *3 (W.D. Wash.
12 June 30, 2025); *see also D.V.D. v. U.S. Dep’t of Homeland Sec.*, 778 F. Supp. 3d
13 355, 377–78 (D. Mass. 2025) (§ 1252(g) did not bar review of “the purely legal
14 question of whether the Constitution and relevant statutes require notice and an
15 opportunity to be heard”).

16 That is precisely what Judge Curiel recently held in a similar case. In *Noori*
17 *v. Larose*, No. 25-CV-1824-GPC-MSB, 2025 WL 2800149, at *1 (S.D. Cal. Oct.
18 1, 2025), the petitioner was (like Petitioner) an asylum seeker from Afghanistan
19 who “presented himself at the U.S. Port of Entry in San Ysidro, California and
20 applied for admission with a CBP One application.” Immigration officials “paroled
21 him into the United States” under the same type of “DT” humanitarian parole as
22 Mr. Simon Juan. *Id.* But after the government cancelled the petitioner’s removal
23 proceedings and placed him in expedited removal, he filed a habeas petition, and
24 the government argued that §§ 1252(g) and (b)(9) stripped the court of jurisdiction
25 to hear his claims. *Id.* at *5.

26 Nevertheless, Judge Curiel found that he had jurisdiction to hear the claims,
27 noting that “Petitioner does not challenge the decision to commence proceedings.”
28 *Id.* at *6. Instead, “Petitioner challenges the legality of the revocation of

1 humanitarian parole in violation of the law and dismissal of ongoing removal
2 proceedings without due process.” *Id.* So even assuming the agency’s revocation
3 of parole “constitutes a decision or action to adjudicate cases,” that action is not “in
4 the discretion” of the agency under § 1252(g) where it was “not performed in
5 accordance with the mandatory procedures.” *Id.* (quoting *Sharkey v. Quarantillo*,
6 541 F.3d 75, 86 (2d Cir. 2008) (alterations omitted)).

7 Other courts have held the same. In *Dep’t of Homeland Sec. v. Regents of the*
8 *Univ. of California*, 140 S. Ct. 1891, 1907 (2020), the Supreme Court held that
9 § 1252(b)(9) “does not present a jurisdictional bar” where those bringing suit “are
10 not asking for review of an order of removal,” “the decision to seek removal,” or
11 “the process by which removability will be determined.” (quotations and alterations
12 omitted). And in *Vasquez Garcia v. Noem*, 25-cv-02180-DMS-MMP, 2025 WL
13 2549431, Dkt. 7 at *8 (S.D. Cal. Sept. 3, 2025), Judge Sabraw held that “§ 1252(g)
14 does not limit the Court’s jurisdiction in the present case” because the petitioners
15 were “enforcing their constitutional rights to due process in the context of the
16 removal proceedings—not the legitimacy of the removal proceedings or any
17 removal order.”

18 Here, because these actions were “not performed in accordance with the
19 mandatory procedures,” they were not undertaken “in the discretion” of the agency.
20 *Noori*, 2025 WL 2800149, at *6; *see also United States ex rel. Accardi v.*
21 *Shaughnessy*, 347 U.S. 260, 265–68 (1954) (holding that agencies must adhere to
22 their own binding regulations, both substantively and procedurally). Accordingly,
23 this Court is not jurisdictionally barred from reviewing them.

24 **CLAIM AND PRAYER FOR RELIEF**

25 For the reasons just given, the statute, the regulations, and the Fifth
26 Amendment Due Process Clause prohibits the government from continuing to
27 detain Petitioner.

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Accordingly, Petitioner respectfully requests that this Court:

1. Order Respondents to immediately release Petitioner from custody under the same conditions of parole;
2. Order all other relief that the Court deems just and proper.

Respectfully submitted,

Dated: April 24, 2026

s/ Zandra Lopez
Zandra Lopez
Federal Defenders of San Diego, Inc.
Email: Zandra_Lopez@fd.org