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12 UNITED STATES DISTRICT COURT
13 DISTRICT OF NEVADA

14 Roberto Villalta Martinez,

15 Petitioner,

16 v.

17 Todd Blance, *et al.*,

18 Respondents.

Case No. 2:26-cv-01970-RFB-BNW

**First Amended Petition for Writ of
Habeas Corpus 28 U.S.C. § 2241**

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INTRODUCTION

Roberto Villalta Martinez has been held in immigration detention since June 4, 2026 on an arrest the government cannot justify on this record. While waiting for the train in Reno, NV to return to his home in South Lake Tahoe, CA, Mr. Villalta Martinez was arrested for trespass.¹ That same day ICE agents arrested, then created an I-200 administrative arrest warrant to justify the ICE detention of Mr. Villalta Martinez as he was taken into ICE custody. ECF No. 8 at Exhibit A. The I-200 was not served on Mr. Villalta Martinez until the day after his arrest by ICE. *Id.* Mr. Villalta Martinez has no outstanding warrants and no pending criminal matters. He nonetheless remains detained at the Nevada Southern Detention Center in Pahrump. Despite producing the administrative warrant signed by Mr. Villalta Martinez on the day *after* he was taken into ICE custody, the government has not produced the initial custody determination that lawful detention requires. ECF No. 8.

The government has confessed that Mr. Villalta Martinez is also a member of the class this Court certified in *Jacobo Ramirez v. Mullin*, and he is entitled to relief under its classwide judgment. *See Jacobo Ramirez v. Mullin*, No. 2:25-cv-02136-RFB-MDC, 2026 WL 879799 (D. Nev. Mar. 30, 2026). ECF No. 8. Under that judgment, Mr. Villalta Martinez may be detained only under 8 U.S.C. § 1226(a) and its implementing regulations, not under § 1225(b)(2). The government has satisfied neither the statute the judgment requires nor the process that statute demands.

His detention has been unlawful from its inception. ICE arrested him with an administrative warrant issued the same day and served on Mr. Villalta after he was in ICE custody, and made none of the pre-deprivation custody determination that §

¹ Facts alleged in this petition without citation to attached exhibit are alleged in good faith on information and belief.

1 1226(a) requires, rendering his detention void *ab initio*. He has now been jailed for
2 over a month on that void foundation. This Court should order his immediate
3 release. Nothing less will remedy the egregious and repeated unlawful conduct of
4 Respondents, who have defied even this Court's order to produce the very
5 documents that could show any lawful basis for holding him.

6 JURISDICTION AND VENUE

7 This Court has jurisdiction pursuant to 28 U.S.C. § 2241, which grants
8 federal courts the authority to issue writs of habeas corpus to individuals in custody
9 if that custody violates "the Constitution or laws or treaties of the United States."
10 28 U.S.C. § 2241(c)(3); *see also Demore v. Kim*, 538 U.S. 510, 516–17 (2003) (holding
11 § 2241 is the proper vehicle through which to challenge the constitutionality of a
12 noncitizen's detention without bail); *Jennings v. Rodriguez*, 583 U.S. 281, 294–296
13 (2018) (holding that neither 8 U.S.C. § 1226(e) nor § 1252(b)(9) bar review of
14 constitutional challenges to prolonged immigration detention).

15 Venue is proper in the District of Nevada under 28 U.S.C. § 1391(e) because
16 Mr. Villalta Martinez is detained in this district.

17 PARTIES

18 Petitioner Roberto Villalta Martinez is a citizen of El Salvador who is
19 currently detained by ICE at the Nevada Southern Detention Center in Pahrump,
20 Nevada.

21 Respondent John Mattos is the warden of the Nevada Southern Detention
22 Center. Mattos is the immediate custodian of Mr. Villalta Martinez

23 Respondent Ruben Leyva is the Acting Field Office Director for the Salt Lake
24 City Field Office of ICE Enforcement and Removal Operations, which has
25 jurisdiction over Mr. Villalta Martinez. He is named in his official capacity and is a
26 legal custodian of Mr. Villalta Martinez.
27

1 Respondent David J. Venturella is the Acting Director of ICE. He is named in
2 his official capacity. As the leader of ICE, the agency responsible for detaining and
3 removing noncitizens, Venturella is a legal custodian of Mr. Villalta Martinez.

4 Respondent Markwayne Mullin is the Secretary of the United States
5 Department of Homeland Security (DHS). He is named in his official capacity. As
6 the Secretary of DHS, Mullin is responsible for the administration of immigration
7 laws. *See* 8 U.S.C. § 1103(a). Mullin is a legal custodian of Mr. Villalta Martinez.

8 Respondent Todd Blanche is the Acting Attorney General of the United
9 States and the most senior official in the U.S. Department of Justice. Blanche is
10 named in his official capacity. The Attorney General delegates his authority to
11 interpret the immigration laws and adjudicate removal cases to the Executive Office
12 of Immigration Review (EOIR), which includes the immigration courts and the
13 Board of Immigration Appeals. Blanche is a legal custodian of Mr. Villalta
14 Martinez.

15 PROCEDURAL HISTORY

16 Petitioner Roberto Villalta Martinez was born in El Salvador. He entered the
17 United States without admission in March 2016. In 2017, Mr. Villalta Martinez
18 applied for and received parole as an I-360 special immigrant juvenile. Exhibit 1.

19 While awaiting a train to return to his apartment in South Lake Tahoe, CA,
20 Mr. Villalta Martinez was arrested and charged by state law enforcement with
21 trespass and other charges in Reno, NV on June 4, 2026. There is no record that a
22 criminal case based on this arrest was filed or charged against Mr. Villalta
23 Martinez. ICE served Mr. Villalta Martinez with the arrest warrant and notice that
24 the government was initiating deportation proceedings the next day. ECF No. 8 at
25 Ex. A. Mr. Villalta Martinez has remained in ICE custody for over a month. Mr.
26 Villalta Martinez does not have any outstanding warrants or pending criminal
27 matters.

1 Upon taking Mr. Villalta Martinez into custody, ICE apparently had no
 2 administrative warrant for his arrest and did not do any initial custody assessment.
 3 Respondents have produced no Form I-286 initial custody determination despite
 4 being ordered to do so by this Court. ICE has since commenced removal proceedings
 5 against Mr. Villalta Martinez and has held him without bond.

6 Mr. Villalta Martinez initiated these proceedings by filing a *pro se* petition for
 7 writ of habeas corpus on June 29, 2026. ECF No. 1. The Federal Public Defender
 8 was appointed on June 30, 2026. ECF No. 4. This Court then issued an order to
 9 show cause requiring Respondents to produce certain records or certify that those
 10 records are not in their possession, custody, or control. ECF No. 4 at 3-4.
 11 Specifically, among other things, this Court ordered the government to produce the
 12 following: (1) I-200 Warrant for Arrest of Alien; (2) Form I-286 Initial Custody
 13 Determination; (3) Form I-862 Notice to Appear; (4) Form I-213 Record of
 14 Deportable or Inadmissible Alien. ECF No. 4 at 3. This Court further ordered the
 15 government to certify in their return that any of the listed documents are not in
 16 their possession, custody, or control. *Id.* at 4.

17 In response to that court order, on July 7, 2026, the government disclosed the
 18 Form I-200, Form I-213, Form-826. The government *did not disclose* the Form I-
 19 286. The government also *did not* certify that the Form I-286 is not in its
 20 possession, custody, or control—despite being ordered to do so by this Court. ECF
 21 No. 4, ECF No. 8.² On July 10, 2026, the government confessed that Mr. Villalta
 22

23 ² This is far from the first time the government has failed to follow a court
 24 order in this district. *See, e.g., Sira v. Bondi*, No. 2:26-cv-00828-JAD-DJA, ECF No.
 25 8 (D. Nev. Apr. 21, 2026) (finding ICE violated order not to transfer Petitioner out of
 26 district, ordering ICE immediately transfer Petitioner back to District of
 27 Nevada); *Barroz Celis v. Bondi*, No. 2:26-cv-00079-GMN-DJA (D. Nev. Mar. 20,
 2026), ECF No. 27 (ordering government to show cause why it should not be held in
 contempt for failure to comply with court order); *Vijdani v. Mattos*, No. 2:25-cv-
 02496-GMN-EJY (D. Nev. Feb. 13, 2026), ECF No. 15 (ordering government to show

Martinez is a *Jacob-Ramirez* class member. ECF No. 8 at 1. *Jacob-Ramirez v. Mullin*, No. 2:25-cv-02136-RFB-MDC, 2026 LEXIS 175584 (D. Nev. Mar. 30, 2026).

This First Amended Petition follows.

GROUNDS FOR RELIEF

I. Mr. Villalta Martinez's continued detention violates the INA (8 U.S.C. §1226(a)), its implementing regulations, and his constitutional due process rights because he was detained without a properly executed administrative warrant or an initial custody assessment.

Mr. Villalta Martinez's detention is unlawful under both 8 U.S.C. § 1225 and § 1226. Because he is a member of the class this Court certified, § 1225 does not authorize his detention; and because ICE arrested him with no properly executed administrative warrant and never made the required initial custody determination, § 1226 does not authorize it either. His detention therefore violates the INA, his due

cause why it should not be held in contempt for failure to comply with court order); *Biel v. Mattos*, No. 2:25-cv-02432-APG-EJY (D. Nev. Mar. 18, 2026), ECF No. 42 (finding government failed to comply with court order); *Niebla Perez v. Mattos*, No. 2:26-cv-00638-RFB-EJY (D. Nev. Apr. 16, 2026) (granting writ and ordering immediate own recognizance release finding that "Respondents' unlawful conduct will not cease in the aftermath of this Order without a remedy of immediate release") *Aguirre Solis v. Noem*, No. 2:26-cv-00053-RFB-EJY (D. Nev. Mar. 19, 2026), ECF No. 28 (finding ICE and DHS imposed release conditions in violation of court's order requiring release on personal recognizance and future violations may result in civil and criminal sanctions for contempt of court); *Mejia Soto v. Rader*, No. 2:25-cv-02281-RFB-EJY (D. Nev. Dec. 17, 2025), ECF No. 14 (finding government violated court order and further violations may lead to sanctions); *Arce-Cervera v. Noem*, No. 2:25-cv-01895-RFB-NJK (D. Nev. Oct. 28, 2025) ECF No. 20 (court noting government's failure to file a response by the extended deadline); *Cruz Ramirez v. Noem*, No. 2:25-cv-02110-RFB-DJA (D. Nev. Dec. 12, 2025) ECF No. 9 (court noting government's failure to file a response by the deadline); *L.M. v. Noem*, No. 2:25-cv-02194-RFB-BNW (D. Nev. Jan. 20, 2026) ECF No. 28 (court noting government's failure to file notice of compliance by the deadline); *Shadalo v. Mattos*, No. 2:25-cv-02076 (D. Nev.) ECF No. 18 (court noting government's failure to file a response by the deadline); *Zarate v. Blanche*, No. 2:26-cv-00320-GMN-MDC (D. Nev. Apr. 14, 2026) (warning government that repeated jurisdictional arguments without a good faith basis may subject counsel to Rule 11 sanctions).

process rights, and this Court's classwide judgment in *Jacobo Ramirez v. Mullin*.
The proper remedy is release.

A. The government cannot lawfully detain Mr. Villalta Martinez under 8 U.S.C. § 1225, because he is a *Jacobo-Ramirez* class member.

The government cannot lawfully detain Mr. Villalta Martinez under 8 U.S.C. § 1225 given this Court's ruling in *Jacobo Ramirez*. In *Jacobo Ramirez*, this Court rejected the government's argument that Section 1225 requires mandatory detention of noncitizens who entered the country without inspection; as the Court explained, such individuals are only subject to discretionary detention under Section 1226, not Section 1225. *Jacobo Ramirez v. Mullin*, No. 2:25-cv-02136-RFB-MDC, 2026 WL 879799 (D. Nev. Mar. 30, 2026). The Court issued a corresponding declaratory judgment to qualifying members of the class. *Id.* at *33. The certified class in *Jacobo-Ramirez* is defined as:

All noncitizens in the U.S. without lawful status (1) who are or will be arrested or detained by ICE; (2) who are or will be in removal proceedings before an Immigration Court within the District of Nevada; (3) whom DHS alleges or will allege to have entered the United States without inspection or parole; (4) who are not or will not be subject to detention under 8 U.S.C. §§ 1226(c), 1225(b)(1), or 1231 at the time they are scheduled for or request a bond hearing; and (5) whose most recent arrest by ICE occurred inside the United States and not while arriving in the United States.

Id.

Mr. Villalta Martinez is a member of the class. He is currently detained by ICE; he is in removal proceedings; he is alleged to have entered the country without inspection or parole; he is not subject to detention under 8 U.S.C. §§ 1226(c), 1225(b)(1), or 1231; and his most recent arrest was in the country, not at or near the border. The *Jacobo Ramirez* declaratory judgment therefore applies to Mr. Villalta

Martinez and forecloses any argument that he is subject to detention under Section 1225. Any continued detention under Section 1225 would be statutorily unlawful and would separately violate due process. *See, e.g., Sira v. Mattos*, No. 2:26-cv-00828-RFB-DJA, 2026 WL 1362499, at *1-*3 (D. Nev. May 15, 2026); *Contreras Cintora v. Lyons*, No. 2:26-cv-01281-RFB-MDC, 2026 WL 1283315, at *1-*3 (D. Nev. May 10, 2026); *Escobar Salgado v. Mattos*, 809 F. Supp. 3d 1123, 1158-62 (D. Nev. 2025) (discussing due process); *Jacobo Ramirez v. Noem*, 817 F. Supp. 3d 1037, 1054-56 (D. Nev. 2025) (same).

B. Mr. Villalta Martinez's detention is unlawful even under 8 U.S.C. § 1226(a).

If the government wanted to detain Mr. Villalta Martinez under its discretionary detention authority under § 1226(a), it “requires an individualized bond determination *before* a noncitizen may be taken into custody.” *Hyppolite v. Noem*, 808 F. Supp. 3d 474, 485 (E.D.N.Y. 2025) (emphasis added); *see also Velesaca v. Decker*, 458 F. Supp. 3d 224, 241 (S.D.N.Y. 2020) (noting that the government did “not dispute, that 8 U.S.C. § 1226(a) and its implementing regulations require ICE officials to make an individualized custody determination”). This Court has repeatedly found that detention undertaken without the *pre-deprivation* process required by §1226(a) and its implementing regulations violates the statute as well as the petitioner’s constitutional due process rights. *See e.g. Quijay Garcia v. Mattos, et al.*, Case No. 2:26-cv-01205-RFB-BNW at ECF No. 14.

Here, the I-200 that was issued on the date of arrest, then served on Mr. Villalta Martinez the day *after* his arrest, and the absent I-286 are fatal to the lawfulness of Mr. Villalta Martinez’s detention. Before a noncitizen can be “arrested and detained pending” removal proceedings, the government must first generate “a warrant issued by the Attorney General,” i.e., a Form I-200 warrant. § 8 U.S.C. 1226(a); *see also* 8 C.F.R. § 236.1(b)(1). The government must also conduct an initial

1 custody determination. 8 C.F.R. § 236.1(d)(1), (g)(1). This Court addressed a
2 similar question in *Djiwaje v. Bondi*, No. 2:26-cv-00344-RFB-MDC (D. Nev. Apr. 6,
3 2026). There, the government produced an I-200 that was unsigned. This Court held
4 that an unsigned I-200 fails to confer arrest authority under § 1226(a) and 8 C.F.R.
5 § 236.1(b)(1), because the signature is the sole indication that an authorized official
6 has made the requisite probable cause determination. *Djiwaje*, at *5 (adopting and
7 incorporating the holdings of *N.S. v. Dixon*, 141 F.4th 279, 282–83 (D.C. Cir. 2025);
8 *Sergio P. v. Bondi*, 2026 WL 497290, at *2 (D. Minn. Feb. 23, 2026)). “Absent a
9 signature, the Court finds that the I-200 does not supply immigration authorities
10 the power to arrest or detain noncitizens.” *Id.* Here, Respondents have produced
11 an I-200 that was not served on Mr. Villalta Martinez, as evidenced by his
12 signature, until the day *after* his arrest. The inference that no basis to detain exists
13 is just as strong as in *Djiwaje*, where a deficient warrant was produced.

14 Moreover, no record of an initial custody determination was produced, which
15 establishes that no initial custody assessment was performed before Mr. Villalta
16 Martinez was detained, and his resulting detention is therefore void *ab initio*. See
17 *Sira*, 2026 WL 1362499, at *3 (finding the government’s failure to produce to be a
18 concession that the documents don’t exist); *Contreras Cintora*, 2026 WL 1283315, at
19 *3 (same).

20 Because the government failed to arrest Mr. Villalta Martinez with a lawfully
21 executed administrative warrant and failed to conduct an initial custody
22 determination, his detention was never authorized under Section 1226 at all. See,
23 e.g., *Sira*, 2026 WL 1362499, at *3 (concluding the “detention was void *ab initio*”);
24 *Contreras Cintora*, 2026 WL 1283315, at *3 (same); cf. *Djiwaje v. Bondi*, No. 2:26-cv-
25 00344-RFB-MDC, 2026 WL 926753, at *3 (D. Nev. Apr. 6, 2026) (discussing the I-
26 200 warrant requirement). Accordingly, his continued detention is unlawful under
27 the statutory and regulatory regime and separately violates procedural and

1 substantive due process because the government has shown no compelling reason
2 for his detention. *See Sira*, 2026 WL 1362499, at *2-*3 (discussing procedural and
3 substantive due process); *Contreras Cintora*, 2026 WL 1283315, at *2-*3 (same).

4 **C. Mr. Villalta Martinez’s continued detention without an**
5 **individualized custody determination violates his substantive**
6 **Due Process rights.**

7 “The Fifth Amendment’s Due Process Clause forbids the Government to
8 deprive any person of liberty without due process of law. Freedom from
9 imprisonment—from government custody, detention, or other forms of physical
10 restraint—lies at the heart of the liberty that Clause protects.” *Zadvydas v. Davis*,
11 533 U.S. 678, 690 (2001) (cleaned up). “Arbitrary civil detention is not a feature of
12 our American government. Liberty is the norm, and detention prior to trial or
13 without trial is the carefully limited exception.” *Rodriguez v. Marin*, 909 F.3d 252,
14 256–57 (9th Cir. 2018) (cleaned up).

15 Even if this Court were to find a statutory basis for Mr. Villalta Martinez’s
16 continued detention, that detention independently violates his substantive due
17 process rights under the Fifth Amendment. This Court held in *Djiwaje* that
18 detention without a lawful arrest and without individualized probable cause
19 “clearly violates substantive due process, because the government has asserted no
20 special justification that outweighs Petitioner’s constitutionally protected liberty
21 interest.” *Djiwaje*, at *7 (citing *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001)).

22 **II. The proper remedy is immediate release.**

23 The government lacked statutory authority to detain Mr. Villalta Martinez in
24 the first instance because Section 1225 does not apply to him and because the
25 government failed to show his arrest was made pursuant to a lawful administrative
26 warrant and failed to show it conducted an initial custody determination, both of
27 which are required prerequisites to detention under Section 1226. This Court

1 should order immediate release. *See Sira*, 2026 WL 1362499, at *3; *Contreras*
 2 *Cintora*, 2026 WL 1283315, at *3; *cf. Burnett v. Lampert*, 432 F.3d 996, 999 (9th Cir.
 3 2025) (“Federal courts have a fair amount of flexibility in fashioning specific habeas
 4 relief.”); *United States v. Handa*, 122 F.3d 690, 691 (9th Cir. 1997) (referencing
 5 “broad and flexible power”). Because Mr. Villalta Martinez’s detention was void
 6 from the outset, the remedy is release, not a belated custody determination. Such a
 7 determination made now could not retroactively supply the warrant and *initial*
 8 custody determination the government was required to make *before* detaining him.
 9 Ordering such a determination to be made now would reward the government’s
 10 noncompliance rather than remedy it. This Court has repeatedly found release to be
 11 the appropriate remedy in materially similar cases. *See e.g. Castillo Alberto v.*
 12 *Mattos, et al.*, No. 2:26-cv-01441-RFB-BNW, 2026 WL 1847394, (D. Nev. June 26,
 13 2026); *Quijay Garcia v. Mattos, et al.*, No. 2:26-cv-01205-RFB-BNW, 2026 WL
 14 1972386, at *3 (D. Nev. July 8, 2026); *Nuno Suarez v. Blanche, et al.*, No. 2:26-cv-
 15 01516-RFB-DJA, 2026 WL 1992721, at *1 (D. Nev. July 9, 2026); *Vargas Aguilar*,
 16 2:26-cv-00426-RFB-DJA (D. Nev. July 9, 2026) ECF No. 16. This Court should do
 17 the same here and order Mr. Villalta Martinez’s immediate release.

18 PRAYER FOR RELIEF

19 Accordingly, Petitioner Roberto Villalta Martinez respectfully requests that
 20 this Court:

- 21 1. Grant this amended petition for a writ of habeas corpus.
- 22 2. Order his immediate release from ICE custody on his own
 23 recognizance.
- 24 3. Enter a permanent injunction against further detention of Mr. Villalta
 25 Martinez by Respondents under 8 U.S.C. § 1225(b)(2)(A).
 26
 27

4. Order Respondents to return any personal property, including any personal identification documents and any employment authorization document upon his release.
5. Order Respondents to file a notice of compliance with the provisions of any order entered in this case.
6. Grant such other and further relief as, in the interests of justice, may be appropriate.

Dated July 16, 2026.

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

/s/ Carmen Brooks
Carmen Brooks
Assistant Federal Public Defender

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury under the laws of the United States of America and the State of Nevada that the facts alleged in this petition are true and correct to the best of counsel's knowledge, information, and belief.

Dated July 16, 2026.

Respectfully submitted,

Rene L. Valladares
Federal Public Defender

/s/ Carmen Brooks

Carmen Brooks
Assistant Federal Public Defender

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has been filed on July 17, 2026. I personally served a true and correct copy of the foregoing First Amended 28 U.S.C. § 2241 Petition by CM/ECF to the following individuals:

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I further certify that some of the participants in the case are not registered electronic filing system users. I have mailed the foregoing document by First-Class Mail, postage pre-paid, or have dispatched it to a third party commercial carrier for delivery within three calendar days, to the following person:

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