

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Igor Andreyka v. Leonard Oddo, et al.

Andreyka · No. Civil No. 26-62 · Decided June 9, 2026

SUMMARY

The court denied Igor Andreyka’s motion to enforce or reconsider a prior order granting him an individualized immigration bond hearing, or alternatively to permit limited discovery. The court held that the bond hearing satisfied due process because the record was disclosed, counsel was permitted to present arguments, and the immigration judge made an individualized determination; the court lacked jurisdiction to review the discretionary bond decision itself.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Joy Flowers Conti
JURISDICTION	United States District Court for the Western District of Pennsylvania
DECIDED	June 9, 2026
DOCKET	Civil No. 26-62
DISPOSITION	other
PROCEDURAL POSTURE	Petitioner moved to enforce or reconsider an earlier habeas order, or alternatively to permit limited discovery, arguing that the immigration bond hearing ordered by the court was constitutionally defective.
STANDARD OF REVIEW	The court reviewed only whether the immigration bond hearing was fundamentally unfair and violated due process; it lacked jurisdiction to review discretionary determinations underlying the immigration judge's bond decision.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion
PARTIES	Igor Andreyka v. Leonard Oddo, et al.

TOPICS

- immigration detention
- procedural due process
- due process
- motion for reconsideration
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court had jurisdiction to review the immigration judge's discretionary bond determination.
2. Whether the April 22, 2026 immigration bond hearing was fundamentally unfair and violated due process because Andreyka was not permitted to testify, the immigration judge allegedly lacked neutrality, and the oral and written explanations were allegedly inadequate.
3. Whether the court should enforce or reconsider its prior order or permit limited discovery concerning the bond hearing.

HOLDINGS

1. The district court may review whether an immigration bond hearing was fundamentally unfair in violation of due process, but it lacks jurisdiction to review the discretionary determinations underlying the immigration judge's bond decision.
2. The bond hearing was fundamentally fair and satisfied due process because the record was produced and disclosed, Andreyka was permitted to make arguments through counsel, and the immigration judge made an individualized determination based on his circumstances.

KEY QUOTATIONS

“The United States Court of Appeals for the Third Circuit has advised that a bond hearing under 8 U.S.C. § 1226 is “fundamentally fair,” and thus satisfies due process, if three essential elements are present: (1) factfinding based on a record produced before the decisionmaker and disclosed to the detainee; (2) the detainee is allowed to make arguments on his or her behalf; and (3) the immigration judge makes an individualized determination of the detainee’s interests.” (Analysis section)

“Federal courts “lack jurisdiction to review any discretionary determinations underlying the [immigration judge’s] bond decision,” and may only “review whether the bond hearing was fundamentally unfair” such that it violates the detainee’s due process rights.” (Analysis section)

FACTUAL BACKGROUND

Andreyka was detained in immigration custody and sought a bond hearing under 8 U.S.C. § 1226(a). At the ordered hearing, the immigration judge considered evidence concerning Andreyka's 2023 DUI arrest, including observations of alcohol consumption and poor performance on roadside evaluations; counsel explained that the charge was withdrawn after an alcohol training course and that Andreyka had no further criminal history. The immigration judge denied bond, and the district court found that the hearing included disclosed evidence, an opportunity for counsel to make arguments, and an individualized assessment based substantially on the DUI arrest.

PROCEDURAL HISTORY

Andreyka, a citizen of Belarus, filed a habeas petition asserting that he was subject to discretionary detention under 8 U.S.C. § 1226(a), rather than mandatory detention under § 1225(b)(2), and was entitled to a bond hearing. The court granted the petition in part on April 15, 2026, ordering an individualized bond hearing before a neutral immigration judge. After the hearing occurred on April 22, 2026, Andreyka challenged its fairness; the district court denied his motion.

DISPOSITION

other

CASES CITED

- *Ghanem v. Warden Essex Cnty. Corr. Facility*, No. 21-1908, 2022 WL 574624, at *2 (3d Cir. Feb. 25, 2022)
- *Quinteros v. Warden Pike Cnty. Corr. Facility*, 784 F. App'x 75, 78 (3d Cir. 2019)
- *Jeddou v. Warden of Delaney Hall Det. Ctr.*, No. 2:26-CV-01203, 2026 WL 1005052, at *2 (D.N.J. Apr. 14, 2026)

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