

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
IOWA

Singh v. Noem

No. No. C26-12-LTS-MAR, United States District Court for the Northern District of Iowa (February 10, 2026)

SUMMARY

The United States District Court for the Northern District of Iowa granted Rashpal Singh’s 28 U.S.C. § 2241 habeas petition, holding that he was not subject to mandatory detention under 8 U.S.C. § 1225(b) (2) and instead remained eligible for bond under § 1226(a). The court directed respondents to immediately release Singh on his previously set \$7,500 bond because they offered no evidence of changed circumstances warranting revocation. The court denied Singh’s motion to strike the respondents’ response.

CASE DETAILS

COURT	United States District Court for the Northern District of Iowa
WRITING FOR THE COURT	Leonard T. Strand
JURISDICTION	United States District Court for the Northern District of Iowa
DECIDED	February 10, 2026
DOCKET	No. C26-12-LTS-MAR
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging detention under 8 U.S.C. § 1225(b)(2) and seeking release on bond; the court granted the petition and denied the petitioner's motion to strike the respondents' resistance.
STANDARD OF REVIEW	The court reviewed the § 2241 detention challenge and determined whether Singh was subject to mandatory detention under 8 U.S.C. § 1225(b)(2).
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; persuasive authority only
PARTIES	Rashpal Singh v. Kristi Noem, et al.

TOPICS

- immigration detention
- removal proceedings
- immigration
- statutory interpretation
- civil procedure

PRACTICE AREAS

Immigration

Federal habeas corpus

Civil procedure

QUESTIONS PRESENTED

1. Whether Singh was subject to mandatory detention under 8 U.S.C. § 1225(b)(2), or instead eligible for bond under 8 U.S.C. § 1226(a).
2. Whether Singh was entitled to release on the previously set \$7,500 bond.
3. Whether Singh's motion to strike the respondents' resistance should be granted.

HOLDINGS

1. Singh was not subject to mandatory detention under § 1225(b)(2); the court applied its prior reasoning that similarly situated aliens do not fall within that provision.
2. Singh was entitled to immediate release on the conditions of his previously set \$7,500 bond because the respondents offered no evidence of changed factual circumstances warranting revocation.
3. The court denied Singh's motion to strike the respondents' resistance.

KEY QUOTATIONS

“I therefore adopt the same reasoning here to find that Singh is not subject to mandatory detention under § 1225(b)(2).” (at 2)

“Because respondents have failed to offer evidence of any change in factual circumstances that would warrant revoking Singh’s previously set \$7,500, respondents are directed to immediately release Singh on the conditions of that bond.” (at 2)

FACTUAL BACKGROUND

Rashpal Singh, an Indian national, entered the United States without inspection around January 2023. He was detained soon afterward but released on a \$7,500 bond. ICE arrested him again in Iowa in November 2025 based on a policy treating aliens who entered without inspection as subject to mandatory detention under 8 U.S.C. § 1225(b)(2).

PROCEDURAL HISTORY

Singh was detained by ICE in November 2025 after entering the United States without inspection and previously being released on a \$7,500 bond. He filed a § 2241 habeas petition asserting that he was eligible for bond under § 1226(a). The respondents filed a late response, acknowledged that the case was not materially distinguishable from similar cases, and the court granted habeas relief and ordered release on the existing bond.

DISPOSITION

writ_granted

CASES CITED

- *Giron Reyes v. Lyons*, 801 F. Supp. 3d 797 (N.D. Iowa 2025)
- *Chilel Chilel v. Sheehan*, No. 25-cv-4053, 2025 WL 3158617 (N.D. Iowa Nov. 12, 2025)
- *Valero-Cabeza v. ICE*, No. 25-cv-217, 2026 WL 296218, at *1 n.2 (N.D. Iowa Feb. 4, 2026)
- *Buenrostro-Mendez v. Bondi*, ___ F.4th ___, 2026 WL 323330 (5th Cir. Feb. 6, 2026)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF IOWA
CEDAR RAPIDS DIVISION RASHPAL SINGH, Petitioner, No. C26-12-LTS-MAR vs.
MEMORANDUM KRISTI NOEM, et al. OPINION AND ORDER Respondents. Petitioner Rashpal Singh is a India national who entered the United States around January 2023 without inspection. He was detained soon after his arrival and released on a \$7,500 bond without issue.

Doc. 1 at 2. In November 2025, Singh encountered Immigration and Customs Enforcement (ICE) in Iowa while traveling through the state in a truck for his work. *Id.* ICE arrested him for seemingly no other reason than its recent change-in-policy purporting to define every alien who entered the United States without inspection subject to mandatory detention under 8 U.S.C. § 1225(b)(2).

Singh then petitioned for a writ of habeas corpus under 28 U.S.C. § 2241, contending that he falls within a class of aliens eligible for bond under 8 U.S.C. § 1226(a).¹ Respondents filed a late response (Doc. 8), to which Singh has responded and has moved to strike (Doc. 6). Oral argument is not necessary. LR 7(c). I have previously ruled that petitioners in similar situations do not fit the criteria of § 1225(b)(2).

See *Giron Reyes v. Lyons*, 801 F. Supp. 3d 797 (N.D. Iowa 2025); *Chilel Chilel v. Sheehan*, No. 25-cv-4053, 2025 WL 3158617 (N.D. Iowa Nov. 12, 1 The record does not appear to indicate that Singh has sought a bond redetermination before an Immigration Judge, nor would he have to as such a request would be futile. See *Valero-Cabeza v. ICE*, No. 25-cv-217, 2026 WL 296218, at *1 n.2 (N.D.

Iowa Feb. 4, 2026) (finding no need for administrative exhaustion in such a situation). 2025). Respondents acknowledge that this case is not materially distinguishable. Doc. 8 at 11 n.5. I therefore adopt the same reasoning here to find that Singh is not subject to mandatory detention under § 1225(b)(2).?

As a result, Rashpal Singh's habeas petition (Doc. 1) is granted. Because respondents have failed to offer evidence of any change in factual circumstances that would warrant revoking Singh's previously set \$7,500, respondents are directed to immediately release Singh on the conditions of that bond. Singh's motion (Doc. 6) to strike respondents' resistance is denied.

IT IS SO ORDERED this 10th day of February, 2026. / Leonard T. Strand United States District Judge * I am aware of, and have reviewed, the contrary holding by a panel of the Fifth Circuit Court of Appeals in Buenrostro-Mendez v. Bondi, __ F.4th __, 2026 WL 323330 (Sth Cir. Feb. 6, 2026). That decision is not binding on this court, nor do I find its reasoning to be persuasive.

Unless and until binding authority dictates a different outcome, I will continue to apply my analysis from Giron Reyes and similar cases.