

**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.

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.