

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Erykn Alcantara Araujo v. Warden, Pike County Correctional
Center; Todd Lyons; Kristi Noem; and Pamela Bondi

No. 3:26cv110 (M.D. Pa. Mar. 17, 2026) · No. No. 3:26cv110 · Decided March 17, 2026

SUMMARY

The United States District Court for the Middle District of Pennsylvania granted Erykn Alcantara Araujo’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that 8 U.S.C. § 1225(b)(2)(A) did not apply to Araujo, who had lived in the United States for approximately three years before being detained, and that his detention was instead governed by 8 U.S.C. § 1226(a). Respondents were ordered to provide an individualized bond hearing within 14 days or Araujo would be released.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Julia K. Munley
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	March 17, 2026
DOCKET	No. 3:26cv110
DISPOSITION	granted
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging immigration detention and seeking a bond hearing or release; the court granted habeas relief, ordered an individualized bond hearing, and dismissed as moot a motion for a temporary restraining order.
STANDARD OF REVIEW	De novo review of the legal basis for detention and consideration of procedural due process under the Mathews v. Eldridge balancing framework.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Erykn Alcantara Araujo v. Warden, Pike County Correctional Center, Todd Lyons, in his official capacity as Acting Director of U.S. Immigration and Customs Enforcement, Kristi Noem, in her official

capacity as Secretary of the United States Department of Homeland Security, Pamela Bondi, in her official capacity as Attorney General of the United States

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QUESTIONS PRESENTED

1. Whether Araujo, an unadmitted noncitizen who had lived in the interior of the United States for approximately three years before being re-detained, was subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A) or discretionary detention under § 1226(a).
2. Whether continued detention without an individualized bond hearing violated Araujo's procedural due process rights under the Fifth Amendment.
3. Whether habeas relief should take the form of an individualized bond hearing rather than immediate release.

HOLDINGS

1. Section 1225(b)(2)(A) does not apply to Araujo because the statutory phrase "alien seeking admission" requires active and ongoing conduct seeking admission, such as physically attempting to enter at a border or port of entry; an unadmitted person residing in the interior is not necessarily an alien seeking admission.
2. Because § 1225(b)(2)(A) did not apply, Araujo's detention was governed by 8 U.S.C. § 1226(a), which permits continued detention but also permits release on bond or conditional parole.
3. Araujo's continued detention without an individualized bond hearing violated procedural due process under the Fifth Amendment.
4. The appropriate remedy was an individualized bond hearing within fourteen days, with release on the petitioner's own recognizance if respondents failed to provide the hearing within that period.

KEY QUOTATIONS

"Under that reading, for purposes of immigration detention, the border is now everywhere." (at 5)

"At this point, Araujo's detention would be governed by Section 1226(a)." (at 7)

"The factors favor providing Araujo with a bond hearing." (at 8)

"A release order will be issued if the respondents do not provide Araujo with an individual bond hearing in the next two weeks." (at 11)

FACTUAL BACKGROUND

Araujo, a native of the Dominican Republic, entered the United States near El Paso in November 2022, requested asylum, and was released while removal proceedings remained pending. After he had lived in the interior for approximately three years, he was arrested in Pennsylvania on charges of terroristic threats and harassment; those charges were dismissed. ICE then detained him, and immigration judges declined to conduct bond hearings on the ground that he was subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A).

PROCEDURAL HISTORY

Araujo was detained by ICE after state criminal charges against him were dismissed. An immigration judge twice concluded that he lacked authority to conduct a bond or custody-redetermination hearing because Araujo was detained under 8 U.S.C. § 1225(b)(2)(A). Araujo filed this § 2241 petition, and the district court held that § 1226(a), rather than § 1225(b)(2)(A), governed his detention and that due process required an individualized bond hearing.

DISPOSITION

granted

REMAND INSTRUCTIONS

Respondents must provide Araujo with an individualized, fair, and impartial bond hearing before an immigration judge within fourteen days. If they fail to do so, Araujo must be released on his own recognizance without bond or conditions. Respondents must file an affidavit or declaration under 28 U.S.C. § 1746 confirming that the hearing occurred; the temporary restraining order motion was dismissed as moot and the case was closed.

CASES CITED

- *Rumsfeld v. Padilla*, 542 U.S. 426, 443 (2004)
- *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025)
- *Matter of Q. Li*, 29 I. & N. Dec. 66 (BIA 2025)
- *Buenrostro-Mendez v. Bondi*, 166 F.4th 494, 508-21 (5th Cir. 2026) (Douglas, J., dissenting)
- *Jennings v. Rodriguez*, 583 U.S. 281, 288, 297 (2018)
- *Quispe v. Rose*, No. 3:25-CV-2276, 2025 WL 3537279, at *5-*7 (M.D. Pa. Dec. 10, 2025)
- *Patel v. O'Neil*, No. 3:25-CV-2185, 2025 WL 3516865, at *5-*6
- *Centeno Ibarra v. Warden of the Federal Detention Center Philadelphia*, No. CV 25-6312, 2025 WL 3294726, at *6 (E.D. Pa. Nov. 25, 2025)
- *Castanon-Nava v. U.S. Department of Homeland Security*, 161 F.4th 1048, 1061 (7th Cir. 2025)
- *Nielsen v. Preap*, 586 U.S. 392, 397-98 (2019)
- *Trump v. J. G. G.*, 604 U.S. 670, 673 (2025)
- *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976)
- *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004)

- *Boumediene v. Bush*, 553 U.S. 723, 779 (2008)
- *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025)
- *Matter of Q. Li*, 29 I. & N. Dec. 66 (BIA 2025)

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