

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

Edgar Jesus Medina Chirinos v. John E. Cantu, et al.

No. CV-26-00756-PHX-MTL (ASB) · No. No. CV-26-00756-PHX-MTL (ASB) · Decided March 23, 2026

SUMMARY

The United States District Court for the District of Arizona denied Edgar Jesus Medina Chirinos's petition for a writ of habeas corpus challenging his immigration detention and seeking a bond hearing under 8 U.S.C. § 1226(a). The court held that, as a person who entered the United States without admission and was not clearly entitled to admission, Chirinos was subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). The court also rejected his due process and Bautista class-membership arguments and dismissed the action.

CASE DETAILS

COURT	United States District Court for the District of Arizona
WRITING FOR THE COURT	Michael T. Liburdi
JURISDICTION	United States District Court for the District of Arizona
DECIDED	March 23, 2026
DOCKET	No. CV-26-00756-PHX-MTL (ASB)
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner sought habeas relief challenging immigration detention and requesting a bond determination hearing under 8 U.S.C. § 1226(a). The district court denied the petition, denied pending motions as moot, dismissed the action, and directed entry of judgment.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status is unknown.
PARTIES	Edgar Jesus Medina Chirinos v. John E. Cantu, et al.

TOPICS

- immigration detention
- removal proceedings
- due process
- statutory interpretation
- immigration

PRACTICE AREAS

- immigration law
- federal habeas corpus
- constitutional law

QUESTIONS PRESENTED

1. Whether Petitioner was subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A), rather than discretionary detention and a bond hearing under § 1226(a).
2. Whether mandatory detention under § 1225(b)(2)(A) violated Petitioner's due process rights.
3. Whether Petitioner's alleged membership in the Bautista class entitled him to habeas relief in the District of Arizona.

HOLDINGS

1. A person who entered the United States unlawfully, has not been admitted, and has not been determined clearly and beyond a doubt to be entitled to admission is subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A).
2. The statutory procedures afforded to Petitioner under the Immigration and Nationality Act and the Illegal Immigration Reform and Immigrant Responsibility Act satisfied due process; the Constitution did not require an additional bond hearing.
3. Petitioner was not entitled to relief in this action based on his alleged membership in the Bautista class; any further relief under the Bautista judgment had to be sought in the Central District of California.

KEY QUOTATIONS

“These procedures represent the due process as provided by Congress in statute. Petitioner is entitled to nothing further under the Constitution.” (at 2)

*“For the reasons explained in Chavez v. Noem, — F. Supp. 3d —, 2026 WL 381618, at *1-2 (D. Ariz. Feb. 9, 2026), the Court finds that a person who entered the United States illegally and is clearly and beyond a doubt not entitled to admission, is subject to mandatory detention under § 1225(b)(2)(A).” (at 1)*

FACTUAL BACKGROUND

Petitioner entered the United States without authorization in 2014 from an unknown country. Immigration authorities arrested him in October 2025 and initiated removal proceedings. He challenged his detention and sought a bond determination hearing, while the government maintained that he was subject to mandatory detention as an applicant for admission.

PROCEDURAL HISTORY

Chirinos filed a federal habeas corpus petition challenging his immigration detention and seeking a bond hearing. The respondents argued that he was subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A). The district court rejected the statutory, regulatory, due-process, and Bautista-class arguments and dismissed the action.

DISPOSITION

dismissed

CASES CITED

- Chavez v. Noem, 2026 WL 381618, at *1-2 (D. Ariz. Feb. 9, 2026)
- Buenrostro-Mendez v. Bondi, 166 F.4th 494 (5th Cir. 2026)
- Dep’t of Homeland Sec. v. Thuraissigiam, 591 U.S. 103, 140 (2020)
- Espinoza Lopez v. Noem, 2026 WL 266597, at *3 (S.D.N.Y. Feb. 2, 2026)
- Calderon Lopez v. Lyons, 2025 WL 3683918, at *1 (N.D. Tex. Dec. 19, 2025)
- Bautista v. U.S. Dep’t of Homeland Sec., No. 26-1044 (9th Cir. Mar. 6, 2026)

OPINION

1 WO 2 3 4 5 6 IN THE UNITED STATES DISTRICT COURT 7 FOR THE DISTRICT OF ARIZONA 8 9 Edgar Jesus Medina Chirinos, No. CV-26-00756-PHX-MTL (ASB) 10 Petitioner, ORDER 11 v. 12 John E Cantu, et al., 13 Respondents. 14 15 I. 16 Petitioner entered the United States from an unknown country without authorization 17 in 2014. (Doc. 1 ¶ 67.) Respondents arrested Petitioner in October 2025.

(Id. ¶¶ 68-72.) 18 Petitioner filed this habeas corpus action challenging his immigration detention and 19 seeking a bond determination hearing under 8 U.S.C. § 1226(a). Respondents argue that 20 Petitioner is subject to mandatory detention without bond under 8 U.S.C. § 1225(b)(2)(A). 21 (Doc. 7 at 2-3.) 22 II. 23 For the reasons explained in Chavez v. Noem, — F. Supp. 3d —, 2026 WL 381618, 24 at *1-2 (D.

Ariz. Feb. 9, 2026), the Court finds that a person who entered the United States 25 illegally and is clearly and beyond a doubt not entitled to admission, is subject to mandatory 26 detention under § 1225(b)(2)(A). See also Buenrostro-Mendez v. Bondi, 166 F.4th 494 (5th 27 Cir. 2026). 28 Based on this record, the Court finds that Petitioner is present without having been 1 admitted and is therefore treated as an applicant for admission under 8 U.S.C. § 1225(a)(1).

2 The Court further finds that an immigration officer has not determined Petitioner clearly 3 and beyond a doubt entitled to be admitted, and therefore mandatory detention under 8 4 U.S.C. § 1225(b)(2)(A) applies. Petitioner’s statutory and regulatory claims must be 5 denied. 6 As far as Petitioner alleges that his detention violates his due process rights, he is 7 mistaken.

The government began removal proceedings against Petitioner under procedures 8 set forth in the Immigration and Nationality Act (“INA”). An alien unlawfully present in 9 the United States “has only those rights regarding admission that Congress has provided 10 by statute.” Dep’t of Homeland Sec. v. Thuraissigiam, 591 U.S. 103, 140 (2020); see also 11 Espinoza Lopez v. Noem, 26 Civ.

00345 (JHR), 2026 WL 266597, at *3 (S.D.N.Y. Feb. 2, 12 2026). 13 In this case, Petitioner received due process in two respects. First, he was afforded 14 the procedural protection of the INA. Second, he was subject to the determination 15 procedures established by Congress in the

Illegal Immigration Reform and Immigration Responsibility Act where an immigration officer determined that he was not entitled to a bond hearing.

These procedures represent the due process as provided by Congress in statute. Petitioner is entitled to nothing further under the Constitution. Finally, the Court also rejects Petitioner's argument that relief should be granted here because he is a member of the Bautista class. See *Calderon Lopez v. Lyons*, — F. 3d —, 2025 WL 3683918, at *1 (N.D.

Tex. Dec. 19, 2025). On March 6, 2026, the Ninth Circuit Court of Appeals temporarily stayed the Bautista declaratory judgment, pending a ruling on the Government's emergency motion for a stay pending appeal. See *Bautista v. U.S. Dep't of Homeland Sec.*, No. 26-1044 (9th Cir. Mar. 6, 2026). If Petitioner believes he is entitled to further relief under the judgment in Bautista, he must seek relief in the Central District of California.

27.... 28.... 1 IT IS THEREFORE ORDERED Petitioner's Petition for Writ of Habeas Corpus 2|| (Doc. 1) is DENIED. This action is dismissed, all pending motions are denied as moot, 3 || and the Clerk of Court must enter judgment accordingly. 4 Dated this 23rd day of March, 2026. 5 Michael T. Liburdi 8 United States District Judge 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 _3-