

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
KENTUCKY, OWENSBORO DIVISION

Shokhrukh Ismatov v. Todd M. Lyons, et al.

Ismatov · No. 4:26-cv-195-RGJ · Decided April 21, 2026

SUMMARY

The United States District Court for the Western District of Kentucky granted Shokhrukh Ismatov’s amended petition for a writ of habeas corpus. The court held that 8 U.S.C. § 1226, rather than § 1225(b)(2), governed his immigration detention and that his continued detention without a merits bond hearing violated due process and the Immigration and Nationality Act. The court ordered his immediate release and required a neutral bond hearing before an immigration judge before any re-detention.

CASE DETAILS

COURT	United States District Court for the Western District of Kentucky, Owensboro Division
JURISDICTION	United States District Court for the Western District of Kentucky, Owensboro Division
DECIDED	April 21, 2026
DOCKET	4:26-cv-195-RGJ
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241, challenging his immigration detention under 8 U.S.C. § 1225 rather than § 1226 and alleging violation of his Fifth Amendment due process rights. The district court granted the amended petition and ordered immediate release followed by a bond hearing before a neutral immigration judge before any re-detention.
STANDARD OF REVIEW	The court applied the three-part balancing test under Mathews v. Eldridge to determine whether continued civil detention violated due process. The statutory classification of detention under § 1225(b)(2) (A) or § 1226 was decided based on the undisputed facts and the governing statutory framework.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Shokhrukh Ismatov v. Todd M. Lyons, et al.

TOPICS

immigration detention

removal proceedings

procedural due process

statutory interpretation

immigration

PRACTICE AREAS

immigration detention

habeas corpus

constitutional law

civil rights

QUESTIONS PRESENTED

1. Whether Ismatov's detention was governed by the mandatory-detention provisions of 8 U.S.C. § 1225(b)(2)(A) or the detention provisions of 8 U.S.C. § 1226.
2. Whether Ismatov's continued detention without an individualized merits bond hearing violated the Fifth Amendment Due Process Clause and the Immigration and Nationality Act.
3. Whether the proper habeas remedy was immediate release and a bond hearing before a neutral immigration judge before any re-detention.

HOLDINGS

1. Section 1226, not § 1225(b)(2)(A), governed Ismatov's detention because he had been present in the United States for approximately three years, was not seeking admission, was not designated as an arriving alien in his Notice to Appear, and was arrested pursuant to an I-200 warrant whose authority arose under § 1226.
2. Ismatov's continued detention violated the Fifth Amendment Due Process Clause and the INA because he had been detained without an individualized merits bond hearing before a neutral immigration judge.
3. The proper remedy was immediate release from the unlawful detention and a neutral merits bond hearing before an immigration judge before any re-detention.

KEY QUOTATIONS

“The Due Process Clause extends to all persons regardless of status.” (Discussion § II.B)

“Habeas has traditionally been a means to secure release from unlawful detention.” (Remedy)

“Rather, [Petitioner’s rights] are violated because he has been detained without a hearing that accords with due process.” (Remedy)

FACTUAL BACKGROUND

Ismatov, a citizen of Uzbekistan, entered the United States without inspection in July 2023, was encountered by immigration officials, served with a Notice to Appear, and released subject to conditions. He lived in New York, had valid work authorization and a New York license and permit, and complied with the conditions of his release. After a January 2026 Indiana Department of Transportation inspection while he was driving for work, local police contacted ICE, arrested him, and transferred him into immigration detention. He had not received a merits bond hearing, and the government did not demonstrate that he was a flight risk or danger to the community.

PROCEDURAL HISTORY

Ismatov was detained by ICE after an Indiana traffic inspection and transferred to immigration detention in the Western District of Kentucky. An immigration judge denied his request for custody redetermination for lack of jurisdiction. Ismatov filed an amended habeas petition; the United States responded and relied on arguments made in related Sixth Circuit appeals. The parties agreed that no evidentiary hearing was necessary, and the district court granted the petition.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

The United States must release Ismatov immediately because of the unlawful detention, provide him with a bond hearing on the merits before a neutral immigration judge pursuant to § 1226 before any re-detention, and certify compliance on the docket by April 22, 2026.

CASES CITED

- *Edahi v. Lewis*, 2025 WL 3466682 (W.D. Ky. Nov. 27, 2025)
- *Vicen v. Lewis*, 2026 WL 541171 (W.D. Ky. Feb. 26, 2026)
- *Lopez-Campos v. Raycraft*, Case No. 25-1965 (6th Cir. Oct. 27, 2025)
- *Alvarez v. Noem*, Case No. 25-1969 (6th Cir. Oct. 27, 2025)
- *Contreras-Cervantes v. Raycraft*, Case No. 25-1978 (6th Cir. Oct. 28, 2025)
- *Pizarro Reyes v. Raycraft*, Case No. 25-1982 (6th Cir. Oct. 29, 2025)
- *Loper Bright Enterprises v. Raimondo*, 603 U.S. 369, 413 (2024)
- *A.A.R.P. v. Trump*, 605 U.S. 91, 94 (2025)
- *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976)
- *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004)
- *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001)
- *Martinez v. Noem*, 2025 WL 2598379, at *2 (W.D. Tex. Sept. 8, 2025)
- *Munoz Materano*, 2025 WL 2630826, at *15
- *Sampiao*, 2025 WL 2607924, at *12
- *Hyppolite v. Noem*, 2025 WL 2829511, at *15-*16 (E.D.N.Y. Oct. 6, 2025)
- *Günaydin v. Trump*, 2025 WL 1459154, at *10 (D. Minn. May 21, 2025)
- *Patel*, 2025 WL 2823607, at *6
- *Beltran Barrera*, 2025 WL 2690565, at *7
- *Roble v. Bondi*, 2025 WL 2443453, at *5 (D. Minn. Aug. 25, 2025)
- *Thuraissigiam*, 591 U.S. at 107
- *Matter of Guerra*, 24 I. & N. Dec. 37, 40 (BIA 2006)

- Lopez-Arevelo v. Ripa, 2025 WL 2691828, at *12 (W.D. Tex. Sept. 22, 2025)
- Black v. Decker, 103 F.4th 133, 149-150 (2d Cir. 2024)
- Maldonado, 2025 WL 2968042, at *9-*10
- Morales-Martinez v. Raycraft, 2025 WL 3124695, at *7 (E.D. Mich. Nov. 7, 2025)
- Alonso, 2025 WL 3083920, at *9
- Lopez-Campos, F.Supp. 3d at 785-86
- Mboup v. Field Office Director of N.J., 2025 WL 3062791, at *2 (D.N.J. Nov. 3, 2025)
- Espinoza, 2025 WL 2675785, at *11
- Ramirez Clavijo, 2025 WL 2419263, at *6

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