

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

Ali Mamoud v. Mike Lewis, et al.

Mamoud · No. 4:26-cv-237-RGJ · Decided April 17, 2026

SUMMARY

The United States District Court for the Western District of Kentucky granted Ali Mamoud’s petition for a writ of habeas corpus. The court held that 8 U.S.C. § 1226, rather than § 1225(b)(2), governed his detention and that his continued detention without an individualized bond hearing violated due process. The court ordered Mamoud’s immediate release, subject to a bond hearing before a neutral immigration judge, and required the government to certify compliance.

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 17, 2026
DOCKET	4:26-cv-237-RGJ
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner sought a writ of habeas corpus challenging his immigration detention under 8 U.S.C. §§ 1225 and 1226 and asserting a violation of the Fifth Amendment Due Process Clause. The district court granted the petition, ordered immediate release, and required a bond hearing before a neutral immigration judge before any re-detention.
STANDARD OF REVIEW	The court applied the three-part Mathews v. Eldridge balancing test to determine whether continued civil detention violated procedural due process.
PRECEDENTIAL VALUE	The opinion is a federal district court memorandum opinion and is not binding outside the case, though it may have persuasive value.
PARTIES	Ali Mamoud v. Mike Lewis, et al.

TOPICS

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

PRACTICE AREAS

immigration

immigration detention

habeas corpus

constitutional law

civil rights

QUESTIONS PRESENTED

1. Whether Mamoud'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 Mamoud's continued detention without a 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, rather than § 1225(b)(2), governed Mamoud's detention because he was not seeking admission and was arrested pursuant to an I-200 warrant issued under § 1226.
2. Mamoud's continued detention under § 1226 without a merits bond hearing violated the Fifth Amendment Due Process Clause and the INA.
3. The proper remedy for Mamoud's unlawful detention was immediate release and a bond hearing on the merits before a neutral immigration judge before any re-detention.

KEY QUOTATIONS

"Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the very liberty that [the Due Process Clause] protects." (Section II.B.1)

"Habeas has traditionally been a means to secure release from unlawful detention." (Section III)

"Rather, [Petitioner's rights] are violated because he has been detained without a hearing that accords with due process." (Section III)

FACTUAL BACKGROUND

Ali Mamoud is a 23-year-old native and citizen of Ghana who entered the United States without inspection in March 2023 and was later released with conditions and issued a Notice to Appear. He applied for asylum in March 2024, and his application remained pending while he participated in removal proceedings. On January 6, 2026, ICE arrested him at a required check-in appointment, issued an I-200 warrant, and detained him at Hopkins County Jail. He had no criminal convictions or charges and had not received a merits bond hearing before an immigration judge.

PROCEDURAL HISTORY

Mamoud was arrested by ICE at a required check-in appointment on January 6, 2026, issued an I-200 warrant, and detained at Hopkins County Jail while in removal proceedings. He filed a habeas petition; the respondents opposed it by incorporating arguments made in related Sixth Circuit litigation. The parties agreed that no evidentiary hearing was necessary, and the district court adjudicated the petition on the papers.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

The United States was ordered to release Mamoud immediately, provide 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 18, 2026.

CASES CITED

- Edahi v. Lewis, 2025 WL 3466682, at *2-*3, *5-*13 (W.D. Ky. Nov. 27, 2025)
- Vicen v. Lewis, 2026 WL 541171, at *2-*9 (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)
- 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)
- Loper Bright Enters., 603 U.S. at 413
- Munoz Materano, 2025 WL 2630826, at *15, *20
- Martinez v. Noem, 2025 WL 2598379, at *2 (W.D. Tex. Sept. 8, 2025)
- 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)
- 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
- 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)

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