

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
TENNESSEE

Axel Jean Carlos Moreno v. Christopher Bullock

Moreno · No. 2:26-cv-02451-BCL-cgc · Decided May 1, 2026

SUMMARY

The United States District Court for the Western District of Tennessee denied Axel Jean Carlos Moreno’s 28 U.S.C. § 2241 petition challenging his immigration detention without a bond hearing and denied his motion for a temporary restraining order. The court held that his detention for less than six months did not violate due process under *Zadvydas v. Davis* and that it lacked jurisdiction over claims challenging the merits or execution of his removal order.

CASE DETAILS

COURT	United States District Court for the Western District of Tennessee
WRITING FOR THE COURT	Brian C. Lea
JURISDICTION	United States District Court for the Western District of Tennessee
DECIDED	May 1, 2026
DOCKET	2:26-cv-02451-BCL-cgc
PROCEDURAL POSTURE	Petitioner sought habeas relief under 28 U.S.C. § 2241 challenging his immigration detention without a bond hearing and moved for a temporary restraining order.
STANDARD OF REVIEW	The court considered whether the petition stated a violation of the Constitution or laws of the United States under 28 U.S.C. § 2241 and whether the court had jurisdiction over claims challenging the execution or merits of removal orders.
PARTIES	Axel Jean Carlos Moreno v. Christopher Bullock, Field Office Director of U.S. Immigration and Customs Enforcement, New Orleans Field Office

QUESTIONS PRESENTED

- Whether Moreno's detention without a bond hearing violated the Due Process Clause.
- Whether the district court had jurisdiction under § 2241 to consider claims challenging the merits or execution of Moreno's removal order.

3. Whether the Field Office Director for the place of confinement was the proper respondent to the § 2241 detention challenge.

HOLDINGS

1. Moreno's detention without a bond hearing did not violate the Constitution because he was subject to mandatory detention under 8 U.S.C. § 1231(a)(2)(A) and had been detained for less than six months.
2. The district court lacked jurisdiction to consider Moreno's claims challenging the merits of his removal or seeking to prevent execution of the removal order.
3. The Field Office Director for the place of confinement was the proper respondent, and the court directed the Clerk to dismiss the other respondents.

FACTUAL BACKGROUND

Moreno, a Honduran citizen, entered the United States in approximately April 2016 and was later subject to final in absentia removal orders issued by an Immigration Judge in 2016 and 2018. ICE encountered him in March 2026 while he was detained in Tennessee on state criminal charges and detained him beginning April 4, 2026, after his release from county custody. He argued that his continued detention without an individualized bond hearing violated due process and sought release or a bond hearing.

PROCEDURAL HISTORY

Moreno filed a § 2241 petition and a motion for a temporary restraining order. The court determined that the Field Office Director for the place of confinement was the proper respondent, directed the Clerk to dismiss the other respondents, denied the habeas petition and TRO, and ordered the case closed.