

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
KENTUCKY, NORTHERN DIVISION AT COVINGTON

Santos Exequiel Mejia v. Sam Olson, et al.

Civil Action No. 2:25-cv-00226-SCM (E.D. Ky. Apr. 29, 2026) · No. 2:25-cv-00226-SCM · Decided April 29, 2026

SUMMARY

The United States District Court for the Eastern District of Kentucky denies Santos Exequiel Mejia’s habeas petition challenging his detention without a bond hearing during removal proceedings. The court holds that, because Mejia entered the United States without admission, he is an applicant for admission under 8 U.S.C. § 1225(a)(1), making his detention subject to the mandatory-detention provision of § 1225(b)(2)(A) rather than the bond provisions of § 1226(a).

CASE DETAILS

COURT	United States District Court for the Eastern District of Kentucky, Northern Division at Covington
JURISDICTION	United States District Court for the Eastern District of Kentucky, Northern Division at Covington
DECIDED	April 29, 2026
DOCKET	2:25-cv-00226-SCM
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging detention without a bond hearing during removal proceedings.
STANDARD OF REVIEW	De novo review of the legal questions concerning statutory interpretation and the lawfulness of detention in a habeas proceeding.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Santos Exequiel Mejia v. Sam Olson, Kristi Noem, Pamela Bondi, Todd M. Lyons, Marc Fields

TOPICS

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

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Mejia's detention during removal proceedings is governed by 8 U.S.C. § 1225(b)(2)(A), requiring mandatory detention without bond, or by 8 U.S.C. § 1226(a), which permits release on bond or conditional parole.
2. Whether § 1225(b)(2)(A) applies to a noncitizen who entered without inspection and has been present in the United States for years, rather than only to an arriving noncitizen.
3. Whether the phrase 'seeking admission' imposes an additional requirement beyond being an 'applicant for admission' under § 1225(b)(2)(A).
4. Whether applying § 1225(b)(2)(A) to Mejia renders 8 U.S.C. § 1226(c) or the Laken Riley Act superfluous.
5. Whether detention without a bond hearing violates Mejia's Fifth Amendment due-process rights.
6. Whether the judgment in *Maldonado Bautista v. Santacruz* required this court to order Mejia's release or a bond hearing.

HOLDINGS

1. A noncitizen who is present in the United States without having been admitted is deemed an 'applicant for admission' under 8 U.S.C. § 1225(a)(1). When an immigration officer determines that the noncitizen is not clearly and beyond a doubt entitled to admission, § 1225(b)(2)(A) requires detention during removal proceedings and does not authorize a bond hearing.
2. Section 1225(b)(2)(A) is not limited to aliens physically arriving in the United States; it applies to the broader category of noncitizens deemed applicants for admission, including noncitizens present in the United States without admission.
3. The phrase 'alien seeking admission' in § 1225(b)(2)(A) does not impose an independent requirement separate from being an 'applicant for admission'; an alien deemed an applicant for admission is necessarily seeking admission.
4. Applying § 1225(b)(2)(A) to unadmitted noncitizens does not render § 1226(c) or the Laken Riley Act superfluous because those provisions impose a temporal requirement concerning when covered noncitizens must be taken into federal custody.
5. Mejia's detention without a bond hearing does not violate the Fifth Amendment because he is receiving the process Congress provided for noncitizens subject to mandatory detention under § 1225(b)(2)(A).
6. The Central District of California's rulings in *Maldonado Bautista* did not bind this court or require relief for Mejia because those rulings did not order nationwide habeas relief or nationwide release and bond hearings for detainees outside that district.

KEY QUOTATIONS

“But he is not entitled to a bond hearing. To the contrary, the applicable statutory language provides that he “shall be detained” during removal proceedings.” (at 1)

“To the contrary, a straightforward application of the plain language of the relevant statute compels the conclusion that he must be detained during his removal proceedings.” (II.A)

“And in no case can a title “undo or limit that which the text makes plain.”” (II.A.1)

“Thus, he has no valid due-process claim under the Fifth Amendment.” (II.B)

“For the foregoing reasons, Petitioner Santos Exequiel Mejia’s Petition for a Writ of Habeas Corpus, [Dkt. 1], is hereby DENIED and will be dismissed with prejudice.” (III)

FACTUAL BACKGROUND

Santos Exequiel Mejia, a Honduran citizen, entered the United States without inspection in May 2021 and was never admitted or paroled. In October 2025, a deportation officer issued him a Notice to Appear charging him with being present in the United States without admission or parole, and DHS detained him without bond during removal proceedings. Mejia sought habeas relief, contending that he was entitled to a bond hearing under 8 U.S.C. § 1226(a) and that detention without a hearing violated due process.

PROCEDURAL HISTORY

Mejia filed a habeas petition on December 23, 2025, arguing that his detention was governed by 8 U.S.C. § 1226(a), which permits a bond hearing, rather than 8 U.S.C. § 1225(b)(2), which requires detention. He also asserted that detention without bond violated the Fifth Amendment and argued that a nationwide class judgment in Maldonado Bautista required his release or a bond hearing. The court rejected those arguments, denied the petition, and ordered that it be dismissed with prejudice.

DISPOSITION

dismissed

CASES CITED

- *Munaf v. Geren*, 553 U.S. 674, 693 (2008)
- *Avila v. Bondi*, 170 F.4th 1128 (8th Cir. 2026)
- *Buenrostro-Mendez v. Bondi*, 166 F.4th 494, 498-505 (5th Cir. 2026)
- *Soto Fernandez v. Olson*, No. 2:25-cv-00206-SCM, 2026 WL 1078100 (E.D. Ky. Apr. 21, 2026)
- *Montoya Cabanas v. Bondi*, No. 4:25-cv-04830, 2025 WL 3171331, at *7 (S.D. Tex. Nov. 13, 2025)
- *Singh v. Noem*, No. Civ 25-1110 JB/KK, 2026 WL 146005, at *35 (D.N.M. Jan. 20, 2026)
- *Castañon-Nava v. Dep’t of Homeland Sec.*, 161 F.4th 1048, 1064 (7th Cir. 2025)
- *Johnson v. Burken*, 930 F.2d 1202, 1205 (7th Cir. 1991)
- *Espinoza Hernandez v. Olson*, No. 25-cv-1670-bhl, 2026 WL 161509, at *6 (E.D. Wis. Jan. 21, 2026)
- *Kentucky v. EPA*, 123 F.4th 447, 457-58 (6th Cir. 2024)

- *Barbosa da Cunha v. Freden*, No. 25-3141-pr, 2026 WL 1146044, __ F.4th __ (2d Cir. Apr. 28, 2026)
- *Jennings v. Rodriguez*, 583 U.S. 281, 286-89 (2018)
- *Coronado v. Sec'y, Dep't of Homeland Sec.*, No. 1:25-cv-831, 2025 WL 3628229, at *8-*11 (S.D. Ohio Dec. 15, 2025)
- *Gomez Hernandez v. Lyons*, No. 1:25-CV-216-H, 2026 WL 31775, at *7 (N.D. Tex. Jan. 6, 2026)
- *Rimini St., Inc. v. Oracle USA, Inc.*, 586 U.S. 334, 346 (2019)
- *Bilski v. Kappos*, 561 U.S. 594, 608 (2010)
- *Abdullah v. Am. Airlines, Inc.*, 181 F.3d 363, 373 (3d Cir. 1999)
- *Atl. Richfield Co. v. Christian*, 590 U.S. 1, 14 n.5 (2020)
- *Heckler v. Cmty. Health Servs. of Crawford Cnty., Inc.*, 467 U.S. 51, 60-61 (1984)
- *FCC v. Fox Television Stations, Inc.*, 556 U.S. 502, 515 (2009)
- *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001)
- *Dep't of Homeland Sec. v. Thuraissigiam*, 591 U.S. 103, 138-39 (2020)
- *Maldonado Bautista v. Santacruz*, 813 F. Supp. 3d 1084, 1122-27 (C.D. Cal. 2025)
- *Moyao Roman v. Olson*, No. 2:25-cv-169-DLB-CJS, 2025 WL 3268403 (E.D. Ky. Nov. 24, 2025)
- *P.B. v. Bergami*, No. 3:25-CV-2978-O, 2025 WL 3632752 (N.D. Tex. Dec. 13, 2025)
- *Altamirano Ramos v. Lyons*, 809 F. Supp. 3d 1015 (C.D. Cal. 2025)
- *Rodriguez v. Noem*, 811 F. Supp. 3d 802 (E.D. Tex. 2025)
- *Sandoval v. Acuna*, No. 6:25-CV-1467, 2025 WL 3048926 (W.D. La. Oct. 31, 2025)
- *Vargas Lopez v. Trump*, 802 F. Supp. 3d 1132 (D. Neb. 2025)
- *Chavez v. Noem*, 801 F. Supp. 3d 1133 (S.D. Cal. 2025)
- *Mejia Olalde v. Noem*, No. 1:25-CV-00168-JMD, 2025 WL 3131942 (E.D. Mo. Nov. 10, 2025)