

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
IOWA

Francisco Coronel Mejia v. Brian D. Gardner, et al.

No. C26-64-LTS-MAR · No. No. C26-64-LTS-MAR · Decided June 2, 2026

SUMMARY

The United States District Court for the Northern District of Iowa denied Francisco Coronel Mejia’s petition for a writ of habeas corpus under 28 U.S.C. § 2241 and his motion for interim relief. The court held that an alien detained under 8 U.S.C. § 1225(b)(2) has no constitutional right to an individualized bond hearing under the circumstances presented. It also rejected his substantive due process challenge, while noting that prolonged or indefinite detention could raise different constitutional concerns.

CASE DETAILS

COURT	United States District Court for the Northern District of Iowa
WRITING FOR THE COURT	Leonard T. Strand
JURISDICTION	United States District Court for the Northern District of Iowa
DECIDED	June 2, 2026
DOCKET	No. C26-64-LTS-MAR
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 and motion for a show-cause order and preliminary injunction challenging immigration detention without an individualized bond hearing.
STANDARD OF REVIEW	A habeas petitioner must prove by a preponderance of the evidence that detention is unlawful. Habeas relief is available when a person is in custody in violation of the Constitution or laws or treaties of the United States.
PRECEDENTIAL VALUE	unpublished
PARTIES	Francisco Coronel Mejia v. Brian D. Gardner, et al.

TOPICS

- immigration detention
- federal habeas corpus
- procedural due process
- substantive due process
- removal proceedings

PRACTICE AREAS

immigration

immigration detention

federal habeas corpus

constitutional law

civil rights

QUESTIONS PRESENTED

1. Whether an alien detained under the mandatory-detention scheme of 8 U.S.C. § 1225(b)(2) has a procedural due process right to an individualized bond hearing during removal proceedings.
2. Whether continued civil detention under § 1225(b)(2), without an individualized bond hearing, violates substantive due process.
3. Whether the petitioner's detention was unlawful under 28 U.S.C. § 2241.

HOLDINGS

1. An alien who unlawfully entered the United States, was never inspected or admitted, and is detained under § 1225(b)(2) does not have a constitutional right to an individualized bond hearing while removal proceedings remain pending.
2. The petitioner's detention did not presently violate substantive due process because he had no deeply rooted fundamental right to release into the United States while removal proceedings were pending without having been lawfully admitted.
3. The petitioner was not entitled to habeas corpus relief or interim relief because his detention was constitutionally permissible at that time.

KEY QUOTATIONS

“At this time, however, Coronel Mejia’s detention is constitutionally permissible.”

FACTUAL BACKGROUND

Francisco Coronel Mejia, a Mexican national, asserted that he entered the United States as a two-year-old in 2004 and had continuously resided there since, although he was never inspected, admitted, or paroled. He was arrested after a January 31, 2026, traffic stop revealed that he lacked a valid driver's license and was then transferred to ICE custody, where he remained held in the Linn County Jail. His removal proceedings were ongoing, and an Immigration Judge denied his request for a bond redetermination hearing on jurisdictional grounds.

PROCEDURAL HISTORY

Coronel Mejia was detained by Immigration and Customs Enforcement after a traffic stop and sought a bond redetermination hearing, which an Immigration Judge denied for lack of jurisdiction. He filed a § 2241 habeas petition and motion for interim relief. After the court ordered responses and supplemental briefing on substantive due process, the court denied both the habeas petition and the motion for interim relief.

DISPOSITION

dismissed

CASES CITED

- *Phongsavanh v. Williams*, 809 F. Supp. 3d 864, 867 (S.D. Iowa 2025)
- *Avila v. Bondi*, 170 F.4th 1128 (8th Cir. 2026)
- *Jennings v. Rodriguez*, 583 U.S. 281, 286, 303 (2018)
- *Yamataya v. Fisher*, 189 U.S. 86, 100-01 (1903)
- *County of Sacramento v. Lewis*, 523 U.S. 833, 840 (1998)
- *Missouri Roundtable for Life v. Carnahan*, 676 F.3d 665, 677 (8th Cir. 2012)
- *Reno v. Flores*, 507 U.S. 292, 302-03 (1993)
- *DHS v. Thuraissigiam*, 591 U.S. 103, 107, 139-40 (2020)
- *Zadvydas v. Davis*, 533 U.S. 678, 693-94 (2001)
- *Mathews v. Eldridge*, 424 U.S. 319, 334-35 (1976)
- *Landon v. Plasencia*, 459 U.S. 21, 32-35 (1982)
- *Banyee v. Garland*, 115 F.4th 928, 931, 933 (8th Cir. 2024)
- *Demore v. Kim*, 538 U.S. 510, 521-31, 523, 528 (2003)
- *Flores v. Reno*, 507 U.S. 292, 299-315 (1993)
- *Carlson v. Landon*, 342 U.S. 524 (1952)
- *Mathews v. Diaz*, 426 U.S. 67, 80 (1976)
- *Dusenberry v. United States*, 534 U.S. 161, 168 (2002)
- *Aroldo Rodriguez Diaz v. Merrick Garland, Rodriguez Diaz v. Garland*, 53 F.4th 1189, 1214 (9th Cir. 2022) (Bumatay, J., concurring)
- *Wong Wing v. United States*, 163 U.S. 228, 235 (1896)
- *Wong Yang Sung v. McGrath*, 339 U.S. 33, 49-50 (1950)
- *Ardestani v. I.N.S.*, 502 U.S. 129, 133 (1991)
- *Gattis v. Gravett*, 806 F.2d 778, 781 (8th Cir. 1986)
- *Ibarra Sanchez v. Bondi*, No. 26-cv-63, 2026 WL 883680, at *2 (D.N.D. Mar. 31, 2026)
- *Department of State v. Muñoz*, 602 U.S. 899, 911 (2024)
- *Dobbs v. Jackson Women's Health Organization*, 597 U.S. 215, 237-39 (2022)
- *Timbs v. Indiana*, 586 U.S. 146, 154 (2019)
- *Muse v. Mullin*, No. 26-cv-4024, 2026 WL 1008532, at *4 (N.D. Iowa Apr. 14, 2026)
- *Abbas v. Schneider*, No. 26-cv-132, 2026 WL 1079292, at *7 (S.D. Iowa Apr. 17, 2026)
- *Romero v. Brown*, ___ F. Supp. 3d ___, 2026 WL 1021455, at *5 (S.D. Iowa Apr. 15, 2026)

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