

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
IOWA

Trsikurishvili v. Noem, et al.

Trsikurishvili · No. No. C26-15-LTS-MAR · Decided March 3, 2026

SUMMARY

The United States District Court for the Northern District of Iowa granted Ilia Trsikurishvili’s petition for a writ of habeas corpus under 28 U.S.C. § 2241. The court held that mandatory detention under 8 U.S.C. § 1225(b)(2) did not apply and ordered respondents to immediately release him on the conditions of his prior release, while requiring a pre-detention hearing if the Government seeks continued detention under 8 U.S.C. § 1226(a).

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	March 3, 2026
DOCKET	No. C26-15-LTS-MAR
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging immigration detention.
STANDARD OF REVIEW	The court reviewed the legality of detention in a habeas proceeding under 28 U.S.C. § 2241.
PRECEDENTIAL VALUE	unpublished district court opinion; nonprecedential
PARTIES	Ilia Trsikurishvili v. Kristi Noem, et al.

TOPICS

- federal habeas corpus
- immigration detention
- removal proceedings
- procedural due process
- statutory interpretation

PRACTICE AREAS

- immigration
- federal habeas corpus
- immigration detention
- constitutional law
- remedies

QUESTIONS PRESENTED

1. Whether Trsikurishvili was subject to mandatory detention under 8 U.S.C. § 1225(b)(2).
2. Whether he was entitled to immediate release rather than a new bond redetermination hearing after the court found that § 1225(b)(2) did not authorize his detention.
3. What process the Government must provide if it seeks to detain him under 8 U.S.C. § 1226(a).

HOLDINGS

1. Trsikurishvili did not fall within the criteria for mandatory detention under 8 U.S.C. § 1225(b)(2), so that provision did not authorize his detention.
2. Because Trsikurishvili had previously been released on his own recognizance, the Government identified no change in circumstances or other justification for revoking that release, and his detention under § 1225(b)(2) was unlawful, he was entitled to immediate release on the conditions of his prior release.
3. If the Government continues to pursue detention under § 1226(a), it must provide a pre-detention hearing at which it bears the burden of proving by clear and convincing evidence that Trsikurishvili is dangerous, is a flight risk, or failed to comply with the terms of his release.

KEY QUOTATIONS

“I agree with the reasoning of these courts that absent a change in circumstances (none of which are advanced by the Government here), Trsikurishvili should be released on the same terms before he was illegally detained in violation of his due process rights under § 1225(b)(2).”

“If the Government continues to pursue Trsikurishvili’s detention under § 1226(a), it must provide him a pre-detention hearing in which it bears the burden of proving by clear and convincing evidence that Trsikurishvili is a danger to the community or flight risk or has failed to comply with the terms of his release.”

FACTUAL BACKGROUND

Trsikurishvili, a citizen and native of Georgia, entered the United States in or about March 2022 and was released on his own recognizance. After an Iowa traffic-related stop in November 2025, immigration officials determined that he lacked lawful status and detained him. An Immigration Judge denied bond for lack of jurisdiction, while the Government relied solely on mandatory detention under 8 U.S.C. § 1225(b)(2) and did not identify dangerousness, flight risk, changed circumstances, or another basis for revoking his prior release.

PROCEDURAL HISTORY

Trsikurishvili filed a § 2241 habeas petition challenging his detention. The court ordered the respondents to respond, the Government filed a response, and Trsikurishvili filed a reply. The court resolved the matter without oral argument and granted the petition, ordering immediate release on the conditions of his prior release.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

Respondents must immediately release Trsikurishvili on the conditions of his previous release. If the Government seeks to detain him under § 1226(a), it must first provide a pre-detention hearing and prove by clear and convincing evidence that he is a danger to the community, a flight risk, or failed to comply with his release conditions.

CASES CITED

- Giron Reyes v. Lyons, 2025 WL 2712427 (N.D. Iowa Sept. 23, 2025)
- Chilel Chilel v. Sheehan, No. 25-cv-4053, 2025 WL 3158617 (N.D. Iowa Nov. 12, 2025)
- Zadvydas v. Davis, 533 U.S. 678, 701 (2001)
- Singh v. Noem, 1:26-cv-00012 (N.D. Iowa Feb. 10, 2026)
- Buenrostro-Mendez v. Bondi, 2026 WL 323330 (5th Cir. Feb. 6, 2026)
- Chogllo Chafila v. Scott, 2025 WL 2688541, at *11 (D. Me. Sept. 21, 2025)
- Pinchi v. Noem, 792 F. Supp. 3d 1025, 1038 (N.D. Cal. 2025)
- Rivera Esperanza v. Francis, 2025 WL 3513983, at *8-9 (S.D.N.Y. Dec. 8, 2025)
- Jose C-S v. Bondi et al., 2026 WL 457336, at *2 (D. Minn. Feb. 18, 2026)
- Yildirim v. Hermosillo, 2026 WL 111358, at *5 (W.D. Wash. Jan. 15, 2026)
- Hernandez v. Kunes, 2026 WL 4111726, at *6 (M.D. Pa. Feb. 13, 2026)