

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Oscar Eligio Amaya v. Kevin Raycraft, Immigration and Customs
Enforcement, Detroit Field Office, Field Office Director of
Enforcement and Removal Operations, et al.

Amaya v. Raycraft · No. 5:25-cv-13539 · Decided December 9, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan granted Oscar Eligio Amaya’s petition for a writ of habeas corpus and dismissed all respondents except ICE Field Office Director Kevin Raycraft. The court held that 8 U.S.C. § 1226(a), rather than § 1225(b)(2), governs Amaya’s detention and ordered Raycraft to provide a bond hearing or release Amaya by December 17, 2025. The court also granted the ACLU of Michigan leave to file an amicus curiae brief and ordered a status report.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	Judith E. Levy
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	December 9, 2025
DOCKET	5:25-cv-13539
DISPOSITION	writ_granted
PROCEDURAL POSTURE	Petitioner filed a combined petition for a writ of habeas corpus and complaint for declaratory and injunctive relief challenging his immigration detention without a bond hearing. Respondents opposed the petition, challenged jurisdiction and venue, and argued that detention was mandatory under 8 U.S.C. § 1225(b)(2).
STANDARD OF REVIEW	The court reviewed the habeas petition under 28 U.S.C. § 2241 and exercised discretion over prudential administrative exhaustion. It interpreted the detention provisions of the Immigration and Nationality Act de novo.
PRECEDENTIAL VALUE	Nonprecedential district court order

PARTIES

Oscar Eligio Amaya v. Kevin Raycraft, Immigration and Customs Enforcement, Detroit Field Office, Field Office Director of Enforcement and Removal Operations, Kristi Noem, Department of Homeland Security, Pamela Bondi, United States Attorney General, Executive Office for Immigration Review

TOPICS

immigration detention removal proceedings subject matter jurisdiction procedural due process
civil procedure

PRACTICE AREAS

immigration habeas corpus civil procedure constitutional law

QUESTIONS PRESENTED

1. Whether the federal district court had jurisdiction over Amaya's immigration habeas petition in the Eastern District of Michigan when the warden of the county jail where he was detained was not named as a respondent.
2. Whether respondents other than the ICE Detroit Field Office Director were proper respondents to the immigration habeas petition.
3. Whether the court should require Amaya to exhaust administrative remedies by appealing the immigration judge's denial of bond before seeking habeas relief.
4. Whether 8 U.S.C. § 1225(b)(2), which provides for mandatory detention of certain aliens seeking admission, governed Amaya's detention, or whether 8 U.S.C. § 1226(a) governed because he had long been present in the United States and was facing removal.
5. Whether Amaya's detention without a bond hearing violated federal law.

HOLDINGS

1. The Eastern District of Michigan had jurisdiction over the petition, and the ICE Detroit Field Office Director, Kevin Raycraft, was a proper respondent because he exercised operational control over Amaya's immigration detention within the district.
2. The court would not require Amaya to exhaust administrative remedies before seeking habeas relief.
3. 8 U.S.C. § 1226(a), rather than 8 U.S.C. § 1225(b)(2), governed Amaya's detention because he had long been present in the United States and was not seeking admission.
4. Because Amaya was detained under § 1226(a) and had not received a bond hearing, his custody violated federal law, entitling him to habeas relief.

KEY QUOTATIONS

“Section 1225(b)(2)(A) “applies to aliens undergoing inspection, which generally occurs at the United States’ border, when they are seeking lawful entry into the United States” and is not applicable to Petitioner.”
(Section III.E)

“Respondent Raycraft is ORDERED to provide Petitioner with a bond hearing pursuant to § 1226(a) on or before December 17, 2025 or otherwise release him by that same date” (Conclusion)

FACTUAL BACKGROUND

Oscar Eligio Amaya is a citizen of El Salvador who had lived in the United States since approximately 2007, residing in Michigan with his U.S.-citizen wife and children. He had no criminal history. ICE and/or CBP detained him at a Michigan worksite after determining that he had entered the United States near Arizona approximately eighteen years earlier without admission or parole. DHS initiated removal proceedings and charged him under 8 U.S.C. § 1182(a)(6)(A)(i), while respondents detained him without a bond hearing under 8 U.S.C. § 1225(b)(2).

PROCEDURAL HISTORY

DHS initiated removal proceedings against Amaya in the Detroit Immigration Court and detained him at the Calhoun County Jail. Amaya filed this federal habeas action under 28 U.S.C. § 2241. The district court granted the ACLU leave to file an amicus brief, rejected respondents' jurisdictional and exhaustion arguments, dismissed all respondents except Kevin Raycraft, granted the habeas petition, and ordered Raycraft to provide a bond hearing under 8 U.S.C. § 1226(a) or release Amaya.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

No remand was ordered. Respondent Kevin Raycraft was ordered to provide Amaya with a bond hearing under 8 U.S.C. § 1226(a) on or before December 17, 2025, or otherwise release him by that date, and to file a status report by December 19, 2025 certifying compliance and stating the result of any bond hearing.

CASES CITED

- United States v. State of Mich., 940 F.2d 143 (6th Cir. 1991)
- Neonatology Assocs., P.A. v. Comm'r, 293 F.3d 128 (3d Cir. 2002)
- Cellnet Commc'ns, Inc. v. F.C.C., 149 F.3d 429 (6th Cir. 1998)
- Shoemaker v. City of Howell, 795 F.3d 553 (6th Cir. 2015)
- Newcomb v. Allergy & ENT Assocs. of Middle Tennessee, P.C., No. 3:10-CV-1230, 2013 WL 3976627 (M.D. Tenn. Aug. 2, 2013)
- Rumsfeld v. Padilla, 542 U.S. 426 (2004)
- Roman v. Ashcroft, 340 F.3d 314 (6th Cir. 2003)
- Kadagan v. Raycraft, No. 25-13602, 2025 WL 3268895 (E.D. Mich. Nov. 24, 2025)

- Hango v. McAleenan, No. 1:19-CV-606, 2019 WL 6695829 (N.D. Ohio Dec. 9, 2019)
- Henderson v. I.N.S., 157 F.3d 106 (2d Cir. 1998)
- Uljic v. Baker, No. 06-13106, 2006 WL 2811351 (E.D. Mich. Sept. 28, 2006)
- Parlak v. Baker, 374 F. Supp. 2d 551 (E.D. Mich. 2005), vacated on other grounds sub nom. Parlak v. U.S. Immigr. & Customs Enf't, No. 05-2003, 2006 WL 3634385 (6th Cir. Apr. 27, 2006)
- Naresh v. Klinger, No. 2:19-CV-12800, 2019 WL 5455469 (E.D. Mich. Oct. 24, 2019)
- Trump v. J. G. G., 604 U.S. 670 (2025)
- Marks v. United States, 430 U.S. 188 (1977)
- Whitlock v. FSL Mgmt., LLC, 843 F.3d 1084 (6th Cir. 2016)
- McCarthy v. Madigan, 503 U.S. 140 (1992)
- Shearson v. Holder, 725 F.3d 588 (6th Cir. 2013)
- United States v. California Care Corp., 709 F.2d 1241 (9th Cir. 1983)
- Lopez-Campos v. Raycraft, No. 2:25-CV-12486, 2025 WL 2496379 (E.D. Mich. Aug. 29, 2025)
- Shawnee Coal Co. v. Andrus, 661 F.2d 1083 (6th Cir. 1981)
- Pizarro Reyes v. Raycraft, No. 25-CV-12546, 2025 WL 2609425 (E.D. Mich. Sept. 9, 2025)
- Hechavarria v. Whitaker, 358 F. Supp. 3d 227 (W.D.N.Y. 2019)
- Contreras-Cervantes v. Raycraft, No. 2:25-CV-13073, 2025 WL 2952796 (E.D. Mich. Oct. 17, 2025)
- Jimenez Garcia v. Raybon, No. 2:25-CV-13086, 2025 WL 2976950 (E.D. Mich. Oct. 21, 2025)
- Casio-Mejia v. Raycraft, No. 2:25-CV-13032, 2025 WL 2976737 (E.D. Mich. Oct. 21, 2025)