

NONPRECEDENTIAL DISPOSITION

To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals
For the Seventh Circuit
Chicago, Illinois 60604

Submitted January 6, 2026*

Decided January 9, 2026

BeforeILANA DIAMOND ROVNER, *Circuit Judge*MICHAEL Y. SCUDDER, *Circuit Judge*DORIS L. PRYOR, *Circuit Judge*

No. 25-1409

SANDEEP SINGH,
*Petitioner,*Petition for Review of a Final
Administrative Removal Order.*v.*

No. 220 471 649

PAMELA J. BONDI,
Attorney General of the United States,
*Respondent.***ORDER**

Sandeep Singh petitions for review of a final administrative removal order issued against him by the Department of Homeland Security. He contends that the Department committed procedural errors when issuing the order and requests that the

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

order be vacated. But because Singh has not demonstrated any prejudice arising from the alleged errors, we deny the petition.

Singh, a citizen of India and permanent resident of Canada, entered the United States from Canada in November 2021 on a visitor visa. In April 2024, he pleaded guilty to conspiracy to possess with intent to distribute methamphetamine. *See* 21 U.S.C. § 841(a)(1); *United States v. Singh*, No. 0645 2:22CR20124 (1) (E.D. Mich. May 2, 2024). The district court imposed 60 months' imprisonment.

In December 2024, the Department served Singh with a Notice of Intent to Issue a Final Administrative Removal Order under 8 U.S.C. § 1228(b). The order charged Singh as removable under 8 U.S.C. § 1227(a)(2)(A)(iii) based on his conviction for an aggravated felony.

Singh responded four days later, raising three points. First, he argued that his removal proceedings should proceed under § 1228(a) and § 1229a—before an immigration judge—rather than under § 1228(b), where the Department makes the final determination. Second, he requested to be removed to Canada, where he is a lawful permanent resident. Third, he asked that the Department issue a detainer notice rather than a final removal order so that he could apply toward early release or prerelease custody the time credits he earned under the First Step Act. *See* 18 U.S.C. § 3632(d)(4)(A), (E).

About two months later, the Department issued a final removal order. It directed Singh's removal to India. About five months after that, after Singh had filed his opening brief on appeal, the Department amended the final order by crossing out "India" and inserting "Canada" as the country of removal.

Singh petitions for review of the removal order, arguing that the Department violated his procedural rights. Singh contends that the Department violated the Immigration and Nationality Act and its implementing regulations by failing: (1) to provide a list of free legal services, 8 C.F.R. § 238.1(b)(2)(iv); (2) to translate his Notice into his native language, Punjabi, *id.* § 238.1(b)(2)(v); and (3) to grant his requests for additional time to respond to the Notice and for a copy of the Department's evidence, *id.* § 238.1(c)(1).[†] To the extent that these arguments involve "constitutional claims or

[†] Singh initially challenged the order's designation of India as his country of removal. But he withdrew that argument after the government provided a copy of the amended order in its response brief designating Canada as his country of removal.

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questions of law,” 8 U.S.C. § 1252(a)(2)(D), we have limited jurisdiction to review them. *See, e.g., Issaq v. Holder*, 617 F.3d 962, 967 (7th Cir. 2010).

But even if Singh could demonstrate procedural error, he cannot obtain relief unless those errors caused prejudice. *See Silais v. Sessions*, 855 F.3d 736, 745 (7th Cir. 2017) (“Courts ... do not set aside agencies’ decisions unless mistakes cause prejudice.” (internal quotation marks omitted)). In other words, Singh must show that the Department’s errors affected the outcome of the proceedings. *See id.*

And Singh cannot show that any procedural errors caused prejudice because he does not dispute the allegation in the Notice that he was convicted of an aggravated felony. Because of his conviction, Singh is “conclusively presumed to be subject to removal and is ineligible for cancellation of removal, voluntary departure, and registration as a permanent resident alien.” *United States v. Santiago-Ochoa*, 447 F.3d 1015, 1020 (7th Cir. 2006).

Singh also contends that he is prejudiced because the removal order prevents him from applying toward early release his time credits under the First Step Act. He argues that the Attorney General should have exercised discretion to delay issuing the removal order. But noncitizens in expedited removal proceedings are barred from any discretionary relief that the Attorney General may grant, so “the absence of prejudice is deducible almost as a matter of law.” *Id.* at 1020; *see* 8 U.S.C. § 1228(b)(5).

Accordingly, we DENY the petition for review.