

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA (Baton Rouge Division)

HABEAS CORPUS FILING PACKET

(28 U.S.C. § 2241)

Emergency Petition for Release and TRO Pursuant to 28 U.S.C. § 2241 and Fed. R. Civ. P. 65(b)

Petitioner: Gardy Gregory Alexandre

A#



ID#



Camp 57 ICE Processing Center

17544 Tunica Trace Angola, LA 70712

Respondents:

Kevin Jordan – Warden, Camp 57 ICE Processing Center

Pam Bondi – Attorney General of the United States

Todd Lyons – Acting Director, U.S. Immigration and Customs Enforcement

Kristi Noem – Secretary, Department of Homeland Security

Field Office Director – DHS/ICE Oakdale Field Office

Chief Counsel – OPLA New Orleans

United States Attorney – Middle District of Louisiana

FILING CHECKLIST

- ☒ Title Page
- ☒ Cover Letter (includes \$5 filing fee notice)
- ☒ Petition for Writ of Habeas Corpus
- ☒ Table of Authorities
- ☒ Memorandum of Law in Support
- ☒ Emergency Petition for Immediate Relief / TRO
- ☒ Proposed Order
- ☒ Proof of Service
- ☒ Declaration of Gardy Gregory Alexandre
- ☒ Exhibit Index

Gardy Gregory Alexandre

Date: October 14, 2025

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PETITION FOR WRIT OF HABEAS CORPUS (28 U.S.C. § 2241)

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA (Baton Rouge Division)

GARDY GREGORY ALEXANDRE, Petitioner, Civil Action No. _____

v.

KEVIN JORDAN, Warden, Camp 57 ICE Processing Center;

PAM BONDI, Attorney General of the United States;

TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement;

KRISTI NOEM, Secretary, Department of Homeland Security;

FIELD OFFICE DIRECTOR, DHS/ICE Oakdale, Louisiana;

OPLA, ICE Chief Counsel, New Orleans; and

UNITED STATES ATTORNEY, Middle District of Louisiana, Respondents.

Petitioner Gardy Gregory Alexandre, appearing pro se, respectfully petitions this Honorable Court
for a writ of habeas corpus under 28 U.S.C. § 2241.

I. CUSTODY AND JURISDICTION

Petitioner is detained by ICE at Camp 57 ICE Processing Center in Angola, Louisiana, within this Court's jurisdiction. Jurisdiction is proper under 28 U.S.C. § 2241 because he challenges the legality and constitutionality of his civil detention.

II. FACTUAL BACKGROUND

Petitioner has been a lawful permanent resident since 1986 and has lived in the United States for nearly forty years. He is an honorably discharged U.S. Army veteran, a two-term AmeriCorps volunteer, and the father of five U.S. citizen children, sharing custody of the two youngest.

On April 14 2025 he was taken into ICE custody after a 15-month federal sentence for a non-violent financial offense; the government's own PSR found him the least culpable of co-defendants.

While his immigration appeal remained pending, ICE officers on Sept 10 2025 attempted to deport him to Haiti. When he objected, they replied:

"If Haiti does not want you, we will send you to a third country."

He was removed from the aircraft before takeoff, but ICE confiscated his entire legal file and has never returned it. He was then transferred to Camp 57 Angola on Sept 11 2025, where he remains detained.

III. CONDITIONS OF CONFINEMENT

At Camp 57 Petitioner has endured three weeks without mental-health medication; no soap, towels, or blankets; flooded toilets; and meals below nutrition standards. Cells are locked during medication hours. When detainees complained, Warden Kevin Jordan responded:

"If I was in your country, living for free, I would not complain. I would shut the f*** up."

These facts show punitive detention contrary to the Fifth Amendment.

IV. CLAIMS FOR RELIEF

1 Due Process Violation — ICE's punitive detention contravenes *Zadvydas v. Davis*, 533 U.S. 678 (2001), and *Bell v. Wolfish*, 441 U.S. 520 (1979). _____

2 Medical Neglect — Failure to provide care violates *Estelle v. Gamble*, 429 U.S. 97 (1976), and *Toma v. Barr*, 2019 WL 6608724 (C.D. Cal. 2019). _____

3 Access to Courts — Confiscation of legal file violates *Bounds v. Smith*, 430 U.S. 817 (1977), and *Lewis v. Casey*, 518 U.S. 343 (1996). _____

4 Military Service Ignored — ICE Directive 10036.2 requires favorable discretion for veterans; its disregard is arbitrary and capricious under *Bent v. Barr*, 445 F. Supp. 3d 408 (N.D. Cal. 2020). _____

V. REQUESTED RELIEF

Petitioner respectfully requests that this Court:

1. Grant the Writ of Habeas Corpus under 28 U.S.C. § 2241;
2. Order immediate release under Alternatives to Detention (ATD);
3. Enjoin ICE from any further removal or transfer while his BIA appeal is pending;
4. Issue a Preservation & Production Order requiring Respondents to produce records of the Sept 10 2025 removal attempt, his A-File, and medical chart within seven days; and
5. Order an OSC and Evidentiary Hearing under 28 U.S.C. § 2243.



Gardy Gregory Alexandre

At  | ID# 

Camp 57 ICE Processing Center – Angola LA 70712

Date: October 14, 2025

TABLE OF AUTHORITIES

Authority Citation

Bell v. Wolfish	<u>441 U.S. 520</u> (1979)
Bent v. Barr	<u>445 F. Supp. 3d 408</u> (N.D. Cal. 2020)
Bounds v. Smith	<u>430 U.S. 817</u> (1977)
Estelle v. Gamble	<u>429 U.S. 97</u> (1976)
Fraihat v. ICE	<u>445 F. Supp. 3d 709</u> (C.D. Cal. 2020)
INS v. St. Cyr	<u>533 U.S. 289</u> (2001)
Jennings v. Rodriguez	<u>138 S. Ct. 830</u> (2018)
Kingsley v. Hendrickson	<u>576 U.S. 389</u> (2015)
Lewis v. Casey	<u>518 U.S. 343</u> (1996)
Nken v. Holder	<u>556 U.S. 418</u> (2009)
Ogbemudia v. INS	<u>988 F.2d 595</u> (5th Cir. 1993)
Toma v. Barr	<u>2019 WL 6608724</u> (C.D. Cal. 2019)
Zadvydas v. Davis	<u>533 U.S. 678</u> (2001)
Hare v. City of Corinth	<u>74 F.3d 633</u> (5th Cir. 1996) (en banc)
Shepherd v. Dallas County	<u>591 F.3d 445</u> (5th Cir. 2009)

Statutes & Regulations: 28 U.S.C. §§ 2241, 2243, 1651(a); 8 C.F.R. § 1003.6(a); Fed. R. Civ. P. 65(b).

Administrative Directive: ICE Directive 10036.2 (2011).

Gordy Alexandre

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17544 Tunica Trace
Angola LA 70712SCREENED
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Clerk of U.S. District Court

~~For~~
U.S. District Court - Middle District of LA
Russell B. Long Federal Building and U.S. Courthouse
977 Florida St Ste 139
Baton Rouge, LA 70801

