FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO
MAR 12 2026
JEFFREY P. COLWELL
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 1:26-cv-00934
(To be supplied by the court)

Yulino Jhon Caisahuana Bravo, Applicant,

v.

Johnny Choate Warden of GEO Group Inc. Aurora, Respondent.
(Name of warden, superintendent, jailer, or other custodian)

(Note: If you are attacking the validity of a state conviction or sentence and not the execution of your sentence, you must file an application for a writ of habeas corpus pursuant to 28 U.S.C. § 2254. If you are attacking the validity of a judgment entered in a federal court, you must file a motion pursuant to 28 U.S.C. § 2255 in the federal court that entered the judgment.)

APPLICATION FOR A WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

A. APPLICANT INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

(Applicant's name, prisoner identification number, and complete mailing address)

Yulino Jhon Caisahuana Bravo [redacted] 3130 N. Oakland St. Aurora, CO 80010

Indicate whether you are a prisoner or other confined person as follows: (check one)

___ Pretrial detainee
___ Civilly committed detainee
_x_ Immigration detainee
___ Convicted and sentenced state prisoner
___ Convicted and sentenced federal prisoner
___ Other: (*Please explain*) _____

B. RESPONDENT INFORMATION

_____
(Respondent's name and complete mailing address)

Johnny Choate, Warden of The GEO Group, Inc., 3130 North Oakland Street, Aurora, Colorado 80010 et al. Additional Respondents named in the Petition for Writ of Habeas Corpus

C. STATEMENT OF CLAIMS

State clearly and concisely every claim you are asserting in this action. For each claim, specify the right that allegedly has been violated and all facts that support your claim. If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "C. STATEMENT OF CLAIMS."

CLAIM ONE: Violation of the Fifth Amendment Due Process Clause and unlawful immigration detention.

Supporting facts:

I entered the United States on June 13, 2022 and was granted parole after presenting myself to immigration authorities at the southern border. I complied with all reporting requirements and lived in the community for nearly three years while pursuing asylum protection.

On January 21, 2026, during a routine ICE supervision appointment, ICE officers re-detained me without providing written notice, without a warrant, and without any hearing before a neutral decisionmaker. ICE claims that I am subject to mandatory detention.

Because I was previously released on parole and lived in the community for several years, any further detention must comply with the statutory framework of 8 U.S.C. §1226(a) and the Due Process Clause of the Fifth Amendment, which requires notice and an individualized custody determination.

By re-detaining me without notice and without a hearing to determine whether I pose a danger or flight risk, Respondents violated my constitutional right to due process.

A full statement of the facts and legal arguments supporting this claim is set forth in the Petition for Writ of Habeas Corpus already filed in this case.

D. PRIOR APPLICATIONS

Have you ever filed a lawsuit, other than this lawsuit, in any federal court in which you raised or could have raised the claim(s) raised in this action? __Yes __X No (*check one*).

If your answer is "Yes," complete this section of the form. If you have filed more than one prior application, use additional paper to provide the requested information for each prior application. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "D. PRIOR APPLICATIONS."

Name and location of court: _____

Case number: _____

Type of proceeding: _____

List the claim(s) raised: _____

Date and result: (Attach a copy of the decision if available) _____

Result on appeal, if appealed: _____

E. ADMINISTRATIVE REMEDIES

WARNING: You must exhaust administrative and/or state remedies before filing an action in federal court pursuant to 28 U.S.C. § 2241. Your case may be dismissed if you have not exhausted administrative and/or state remedies. If additional space is needed to explain exhaustion, use extra paper to do so. Please indicate that additional paper is attached and label the additional pages regarding exhaustion as "E. ADMINISTRATIVE REMEDIES."

Explain the steps you have taken to exhaust administrative and/or state remedies: Administrative remedies are not available or adequate to challenge the legality of this detention. Immigration courts and the Board of Immigration Appeals do not provide an effective mechanism to review the constitutional and statutory claims raised in this petition. Accordingly, habeas corpus under 28 U.S.C. §2241 is the proper vehicle for judicial review.

F. REQUEST FOR RELIEF

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "F. REQUEST FOR RELIEF." I respectfully request that the court issue an order to show cause requiring respondents to justify my detention, grant the writ of habeas corpus, order my immediate release from immigration detention and grant any additional relief the court deems just and proper.

G. APPLICANT'S SIGNATURE

I declare under penalty of perjury that I am the applicant in this action, that I have read this application, and that the information in this application is true and correct. *See* 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this application: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the application otherwise complies with the requirements of Rule 11.

Gull
(Applicant's signature)

03-10-2026
(Date)

(Form Revised December 2017)