UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
TALLAHASSEE DIVISION

Erickson Ricardo Mejia Quinbayo, Petitioner, v. **Todd Lyons,** Acting Director, U.S. Immigration and Customs Enforcement; **Facility Administrator,** Call Field Office, ICE Detention; **Pam Bondi,** Attorney General of the United States; **Markwayne Mullin,** Secretary of Homeland Security, Respondents. _____/	Case No. 4:26-CV-160 MW/MAF **PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 (PRO SE)**

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

I. INTRODUCTION

Petitioner Erickson Ricardo Mejia Quinbayo, a thirty-four-year-old Venezuelan national, respectfully petitions this Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241. Petitioner has been detained since March 24, 2026, without any bond hearing, in violation of his Fifth Amendment right to due process. He was arrested without a warrant during an immigration enforcement traffic stop, despite presenting valid and current driver's license, vehicle insurance, and vehicle registration. He has a fully pending I-589 Application for Asylum and for Withholding of Removal, with a Master Calendar Hearing scheduled before Immigration Judge Benjamin Rosen on April 22, 2026 — twenty-two (22) days from the date of this filing. He is not subject to mandatory detention under INA § 236(c). His infant son, six months old, underwent surgery under general anesthesia on March 25, 2026 — the day after his arrest — and requires postoperative care that Petitioner is unable to provide due to his unlawful detention.

II. JURISDICTION

This Court has jurisdiction pursuant to 28 U.S.C. § 2241, which authorizes federal courts to grant writs of habeas corpus to persons held in custody in violation of the Constitution or laws of the United States. Petitioner is physically detained within the Northern District of Florida, at the Call Field Office, 12499 Pogo Street, Bristol, Florida 32321 (Liberty County). Venue is proper in this district.

III. PARTIES

Petitioner Erickson Ricardo Mejia Quinbayo is a citizen and national of Venezuela, currently detained at the Call Field Office ICE Detention, 12499 Pogo Street, Bristol, Florida 32321. His A-Number is A-[redacted]. He proceeds pro se.

Respondent Todd Lyons is the Acting Director of the United States Immigration and Customs Enforcement and is sued in his official capacity.

Respondent Facility Administrator is the official responsible for the Call Field Office detention facility, 12499 Pogo Street, Bristol, Florida 32321, and is sued in his or her official capacity.

Respondent Pam Bondi is the Attorney General of the United States and is sued in her official capacity.

Respondent Markwayne Mullin is the Secretary of Homeland Security and is sued in his official capacity.

IV. STATEMENT OF FACTS

A. Background and Entry.

Petitioner Erickson Ricardo Mejia Quinbayo is a citizen and national of Venezuela, born [redacted], in Maracaibo, Venezuela. He entered the United States on June 2, 2023, at the Bridge of the Americas Port of Entry, El Paso, Texas. He was paroled into the United States pursuant to Section 212(d)(5) of the Immigration and Nationality Act. A Notice to Appear (NTA) was issued on June 2, 2023, (Event No. [redacted], charging him under INA § 212(a)(7)(A)(i)(I). His last home address in the United States was [redacted]

B. Full Compliance with ICE Supervision.

Following his release on recognizance on June 14, 2023, pursuant to ICE Form I-220A, Petitioner has complied with every ICE reporting obligation without exception. He reported to ICE on June 14, 2023; June 12, 2024; and November 26, 2025. His next scheduled reporting date was not until November 9, 2027. His record of compliance is documented in the Personal Report Record attached as an exhibit.

C. Unlawful Arrest on March 24, 2026.

On March 24, 2026, Petitioner was operating a white truck in the course of his employment when he was stopped as part of an immigration enforcement raid. ICE agents approached his vehicle and demanded his driver's license, vehicle insurance, and vehicle registration. Petitioner provided all three documents, all of which were valid and current. There was no criminal basis for the stop and no warrant for Petitioner's arrest. After reviewing Petitioner's documents, the agents identified themselves as immigration officers, ordered Petitioner to exit the vehicle, and

placed him under arrest. No arrest warrant was presented at any time. Petitioner was transported to the Call Field Office ICE Detention, 12499 Pogo Street, Bristol, Florida 32321, where he has remained since.

D. No Bond Hearing.

Since his arrest on March 24, 2026, Petitioner has not been afforded any bond hearing before an immigration judge. He has been held in civil immigration detention without any individualized assessment of his flight risk or danger to the community.

E. Pending Asylum Proceeding.

Petitioner has a fully pending I-589 Application for Asylum and for Withholding of Removal. His next immigration court appearance is a Master Calendar Hearing scheduled for April 22, 2026, at 8:30 a.m., before Immigration Judge Benjamin Rosen at 12832 N.W. CTR Ave., P.O. Box 67, Bristol, Florida 32321. Removal prior to this hearing would permanently and irreparably destroy his pending asylum claim.

F. Infant Son's Medical Emergency.

On March 25, 2026 — the day after Petitioner's arrest — his infant son, E[redacted] date of birth[redacted] underwent a surgical procedure under general anesthesia at HCA Florida Gulf Coast Hospital, Panama City, Florida. The child weighs 53 pounds and required postoperative care including prescription pain medication (hydrocodone-acetaminophen) and follow-up with the pediatric surgeon within two weeks of discharge. The designated caregiver is [redacted]. Petitioner's detention has deprived his family of his presence and support during a critical medical recovery period.

V. LEGAL CLAIMS

A. Petitioner's Detention Without a Bond Hearing Violates the Fifth Amendment and INA § 236(a).

The Fifth Amendment's Due Process Clause requires that civil immigration detainees receive an individualized bond hearing before they may be detained for a prolonged period. Petitioner is not subject to mandatory detention under INA § 236(c) because his prior criminal history consists solely of a minor misdemeanor and does not constitute an aggravated felony or a crime of moral turpitude triggering mandatory detention under that provision. Accordingly, Petitioner is entitled to a bond hearing pursuant to INA § 236(a), which he has been denied. His continued detention without any such hearing violates the Fifth Amendment's guarantee of due process.

B. Petitioner's Arrest Without a Warrant Raises Fourth Amendment Concerns.

Petitioner was arrested during a traffic stop without any arrest warrant. He had committed no criminal offense and presented valid documentation upon request. His warrantless arrest, untethered to any administrative or judicial warrant, raises serious Fourth Amendment concerns warranting judicial scrutiny.

C. Petitioner's Detention Pending His Asylum Hearing Causes Irreparable Harm.

Petitioner has a Master Calendar Hearing on April 22, 2026, before Immigration Judge Rosen. Removal prior to this hearing would permanently and irreparably destroy his pending asylum claim, eliminating his right to seek withholding of removal and protection under the Convention Against Torture. These harms cannot be remedied after removal.

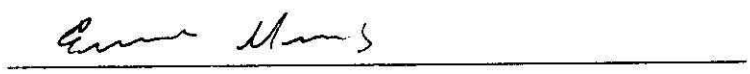
VI. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately or, in the alternative, order Respondents to provide Petitioner with an individualized bond hearing before an immigration judge forthwith;
2. Issue an Emergency Temporary Restraining Order and Preliminary Injunction staying Petitioner's removal from the United States pending full adjudication of this Petition;
3. Order Respondents to ensure that Petitioner is not removed, transferred out of this jurisdiction, or otherwise rendered unavailable to this Court pending adjudication;
4. Order Respondents to file a response to this Petition within a time set by this Court;
5. Construe this pro se Petition liberally pursuant to Haines v. Kerner, 404 U.S. 519 (1972); and
6. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

Dated: March 31, 2026



Erickson Ricardo Mejia Quinbayo

Pro Se | A-[redacted]

Call Field Office / ICE Detention

12499 Pogo Street, Bristol, Florida 32321

CERTIFICATE OF SERVICE

I, Erickson Ricardo Mejia Quinbayo, hereby certify that on March 31, 2026, I caused a true and correct copy of the Petition for Writ of Habeas Corpus to be served upon the following parties by depositing the same in the United States mail, first-class postage prepaid, and by certified mail, return receipt requested:

1. Civil Process Clerk, U.S. Attorney's Office, Northern District of Florida, 111 N. Adams Street, 4th Floor, Tallahassee, FL 32301
2. Pam Bondi, Attorney General of the United States, U.S. Department of Justice, 950 Pennsylvania Avenue, NW, Washington, DC 20530-0001
3. Markwayne Mullin, Secretary of Homeland Security, 2707 Martin Luther King Jr. Avenue, SE, Washington, DC 20528
4. Todd Lyons, Acting Director, U.S. Immigration and Customs Enforcement, 500 12th Street, SW, Washington, DC 20536
5. Facility Administrator, Call Field Office, ICE Detention, 12499 Pogo Street, Bristol, Florida 32321

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on March 31, 2026, at Bristol, Florida.



Erickson Ricardo Mejia Quinbayo

Pro Se | A[redacted]

Call Field Office / ICE Detention

12499 Pogo Street, Bristol, Florida 32321