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Attorney for Petitioner

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
CIVIL DIVISION

Jesus MATIAS SANCHEZ Petitioner, v. Brian MCSHANE, Field Office Director of Enforcement and Removal Operations, Philadelphia Field Office, Immigration and Customs Enforcement; Markwayne MULLIN, Secretary, U.S. Department of Homeland Security; U.S. DEPARTMENT OF HOMELAND SECURITY; Todd BLANCHE, Acting U.S. Attorney General; The EXECUTIVE OFFICE FOR IMMIGRATION REVIEW; and J.L. JAMISON as Warden of the Philadelphia Federal Detention Center Respondents.	Case No. **PETITION FOR WRIT OF HABEAS CORPUS**

PETITION FOR WRIT OF HABEAS CORPUS

1. This is a petition for a writ of habeas corpus filed on behalf of Jesus MATIAS SANCHEZ seeking relief to remedy his unlawful detention. Respondents are currently detaining Mr. Matias Sanchez subject to initiation of immigration proceedings.

INTRODUCTION

2. Petitioner, Jesus Matias Sanchez is in the physical custody of Respondents at the Philadelphia Federal Detention Center. He now faces unlawful detention as the Respondents, Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have placed into operation procedures which meaningfully deprive Petitioner of release.

3. Petitioner was detained on or about April 15, 2026 by Immigration and Customs Enforcement ("ICE") Enforcement Removal Operations ("ERO") officers just three miles from his home in

4. At the time of his arrest, Petitioner was on his way to work when he was stopped by immigration officers and quickly detained before being moved to the Dover Field Office in Delaware. Petitioner was assigned an A number and informed he would be moved to the Moshannon Valley Processing Center. Petitioner is presently detained at the Philadelphia Federal Detention Center.

5. Respondents now seek to subject him to a sweeping mandatory detention framework more appropriately reserved—by statute and longstanding interpretation—for individuals who are entering at the border. Petitioner's detention is not an isolated deviation; it reflects a broader enforcement posture that courts across the country have repeatedly scrutinized and rebuked.

6. On January 20, 2025, the President issued several executive actions relating to immigration, including the Executive Order entitled "Protecting the American People Against Invasion," which articulated an expansive interior enforcement agenda. That Order directed the Secretary of Homeland Security "to take all appropriate action to enable" ICE, CBP, and USCIS to prioritize civil immigration enforcement procedures, including through the use of mass detention.[1]

7. In late May 2025, then Secretary for the Department of Homeland Security Kristi Noem and White House Deputy Chief of Staff Stephen Miller reportedly met with ICE leadership and imposed an arrest quota of 3,000 individuals per day, threatening job consequences if officials failed to meet arrest quotas.[2] Deputy Chief of Staff Miller remarked that "[u]nder President Trump's leadership, we are looking to set a goal of a minimum of 3,000 arrests for ICE every day, and President Trump is going to keep pushing to get that number up higher each and every single day."[3]

8. Following these directives, ICE personnel were reportedly instructed to "turn the creativity knob up to 11," to "push the envelope," and to pursue "collateral" arrests—stating that "[i]f it involves handcuffs on wrists, it's probably worth pursuing."[4]

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[1] Exec. Order No. 14,159, Protecting the American People Against Invasion, 90 Fed. Reg. 8,447 (Jan. 20, 2025); *Protecting the American People Against Invasion*, The White House (Jan. 20, 2025), https://www.whitehouse.gov/presidential-actions/2025/01/protecting-the-american-people-against-invasion/.

[2] Julia Ainsley, et al., A sweeping new ICE operation shows how Trump's focus on immigration is reshaping federal law enforcement, NBC News (June 4, 2025), https://www.nbcnews.com/politics/justicedepartment/ice-operation-trump-focus-immigrationreshape-federal-lawenforcement-rcna193494 (last visited Nov 26, 2025); Brittany Gibson & Stef W. Kight, Scoop: Stephen Miller, Noem tell ICE to supercharge immigration arrests, Axios (May 28, 2025), available at https://www.axios.com/2025/05/28/immigration-ice-deportations-stephen-miller (last visited Nov. 26. 2025).

[3] Hannity, Sean, "Stephen Miller says the admin wants to create the strongest immigration system in US History", FOX NEWS (May 28, 2025), https://www.foxnews.com/video/6373591405112 (last visited Nov. 26, 2025).

[4] Olivares, José , "US immigration officers ordered to arrest more people even without warrants," The Guardian (Jun 4, 2025) https://www.theguardian.com/us-news/2025/jun/04/immigration-officials-increased-detentions-collateral-arrests

9. When the executive branch has announced daily numerical arrest targets, encouraged aggressive collateral apprehensions, and reshaped detention classifications to maximize custody, the promise of neutral adjudication becomes illusory. Habeas corpus exists precisely to safeguard against such structural distortions of liberty.

10. Petitioners continued detention must be evaluated within this broader context. When executive directives emphasize mass arrests, when long-settled statutory interpretations are recast to expand mandatory detention, when experienced immigration judges report institutional intimidation, and when sworn testimony raises concerns about constitutional compliance within enforcement ranks, meaningful relief before the agency becomes structurally compromised. Under these circumstances, habeas review by this Court is not merely appropriate—it is indispensable to ensure that executive detention tethered to statute, the Constitution, and the rule of law itself.

JURISDICTION

11. Petitioner is in the physical custody of Respondents. Petitioner is presently being held at the Philadelphia Federal Detention Center in Philadelphia, Pennsylvania.

12. This Court has jurisdiction under 28 U.S.C. § 2241(c)(5) (habeas corpus), 28 U.S.C. § 1331 (federal question jurisdiction), and Article I, section 9, clause 2 of the United States Constitution (the Suspension Clause). This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

13. This Court may grant relief pursuant to 28 U.S.C. § 2241, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.,* and the All Writs Act, 28 U.S.C. § 1651.

VENUE

14. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Eastern District of Pennsylvania, the judicial district in which Petitioner currently is detained.

15. Venue is also properly in this Court pursuant to 28 U.S.C. § 1391(e) as Respondent are employees, officers, and agencies of the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the Eastern District of Pennsylvania.

REQUIREMENTS OF 28 U.S.C. § 2243

16. The Court must grant the petition for writ of habeas corpus or order Respondents to show cause "forthwith," unless the petition is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Respondent must file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

17. Habeas corpus is "perhaps the most important writ known to the constitutional law…affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). "The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and receives prompt action from him within the four corners of the application." *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation omitted).

PARTIES

18. Petitioner Jesus Matias Sanchez is a citizen and national of Mexico who is presently in physical custody of Respondents. Following the arrest of Petitioner in Delaware, ICE placed

Petitioner into custody in the Philadelphia Federal Detention Center pending removal proceedings.

19. Respondent, Brian McShane is the Director of the Field Office of ICE's Enforcement and Removal Operations division which oversees the Philadelphia Office and immigrant detention at the Philadelphia Federal Detention Center. As such, Director McShane is Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. He is named in his official capacity.

20. Respondent Markwayne Mullin is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the Immigration and Nationality Act ("INA"), and oversees ICE, which is responsible for Petitioner's detention. Secretary Mullin has ultimate custodial authority over Petitioner and is sued in his official capacity.

21. Respondent Department of Homeland Security ("DHS") is the federal agency responsible for implementing and enforcing the INA, including the detention and removal of noncitizens.

22. Respondent Todd Blanche is the Acting Attorney General of the United States. He is responsible for the Department of Justice, of which the Executive Office for Immigration Review and the immigration court system it operates is a component agency. He is sued in his official capacity.

23. Respondent Executive Office for Immigration Review ("EOIR") is the federal agency responsible for implementing and enforcing the INA in removal proceedings, including for custody redetermination in bond hearings.

24. Respondent J.L. Jamison, as Warden of the Philadelphia Federal Detention Center, where Petitioner is detained is named in their official capacity having immediate physical custody of Petitioner. He is sued in his official capacity.

LEGAL FRAMEWORK

25. Civil immigration detention must rest on lawful, individualized determination that detention is justified under the statutory framework as established by Congress. It cannot be imposed as the byproduct of a generalized enforcement campaign or arbitrary numerical targets. Yet the circumstances surrounding Petitioner's arrest and detention strongly indicate that his custody is not the result of a particularized assessment, but rather flows from a broader enforcement posture designed to maximize arrests and detention irrespective of individualized risk.

26. Such seizures raise serious constitutional concerns. When enforcement practices become quota-driven, the risk of arbitrary detention increases substantially, eroding the constitutional boundary between permissible civil enforcement and impermissible dragnet policing.

27. The facts of this case reflect the predictable consequences of that policy environment. Petitioner has been present in the United States for approximately eighteen (18) years. He is the father to two U.S. citizens, and has no history which would support a finding that he is a risk to the community or a risk of flight.

28. Nonetheless, Respondents have operationalized a nationwide policy mandating the detention of all individuals who entered without admission or parole, regardless of whether that person was apprehended upon their entry into the United States.[5]

[5] *See Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).

29. Even assuming arguendo that Petitioner's initial apprehension was lawful, his continued detention must still comport with the framework Congress enacted in the INA. That framework requires individualized custody determination and carefully distinguishes between discretionary and mandatory detention.

30. Historically, Petitioner and those similarly situated would be subject to discretionary detention under 8 U.S.C. § 1226. This section of the Act authorizes the detention of noncitizens in standard removal proceedings before an Immigration Judge ("IJ"). *See* 8 U.S.C. § 1229a. Individuals in § 1226(a) detention have historically been entitled to a bond hearing at the outset of their detention, *see* 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention. *See* 8 U.S.C. § 1226(c).

31. Rather than adhere to those statutory limits, DHS and EOIR have attempted to reclassify broad categories of long-term resident as "applicants for admission," thereby subjecting them to mandatory detention and stripping immigration judges of their traditional custody authority.

32. The INA provides for mandatory detention of noncitizens subject to expedited removal under 8 U.S.C. § 1225(b)(1) and for other recent arrivals seeking admission referred to under § 1225(b)(2). This case concerns the detention provisions at §§ 1226(a) and 1225(b)(2).

33. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act ("IIRIRA") of 1996.[6]

[6] Pub. L. No. 119-1, 139 Stat. 3 (2025).

34. Following the enactment of the IIRIRA, EOIR drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225 and that they were instead detained under § 1226(a).[7]

35. Thus, in the decades that followed, most people who entered without inspection and were placed in standard removal proceedings received bond hearing, unless their criminal history rendered them ineligible. That practice was consistent with many more decades of prior practice, in which noncitizens who were not deemed "arriving" were entitled to a custody hearing before an IJ or other hearing officer.[8]

36. Respondents rely on their current interpretation as announced by *Yajure Hurtado* to subject Petitioner to mandatory detention subject to removal proceedings. Respondent's new legal interpretation is contrary to the statutory framework and decades of practice applying § 1226(a) to those similarly situated to the instant Petitioner.

37. Section 1226(a) applies by default to all persons "pending a decision on whether the [noncitizen] is to be removed from the United States." These removal hearings are held under § 1229a. to "decid[e] the inadmissibility or deportability of a[] [noncitizen]."

38. Federal district courts, including in this District have continued to reject this sweeping reclassification. *See e.g. Holguin Velez v. Jamison,* No. 26-1918, 2026 WL 893679, at *1 (E.D. Pa. Apr. 1, 2026) (Scott, J.); *Teletor Jimenez v. Bondi*, No. 26-1698, 2026 WL 800952, at *2 (E.D. Pa. Mar. 20, 2026) (Hodge, J.).

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[7] *See* Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997).

[8] *See* 8 U.S.C. § 1252(a) (1994); *see also* H.R. Rep. No. 104-469, pt. 1, at 229 (1996) (noting that § 1226(a) simply "restates" the detention authority previously found at § 1252(a)).

39. Habeas corpus exists precisely to address this type of structural deprivation of liberty. Where the government's coordinated use of stays, appeals, and binding precedent ensures continued detention regardless of individualized findings or federal court declarations, administrative remedies are not merely inadequate—they are illusory.

EXHAUTION AND FUTILITY OF ADMINISTRATIVE REMEDIES

40. Immigration judges are now uniformly instructed to refuse jurisdiction over custody proceedings despite the district court's ruling. This instruction renders any request for bond before the Immigration Court functionally meaningless. Where adjudicators are instructed in advance that they lack jurisdiction and must deny relief, exhaustion is excused because the outcomes is foreordained.[9]

41. Any appeal by Petitioner to the Board of Immigration Appeals is equally futile. The Board has already articulated its binding position in *Matter of Yajure-Hurtado*, which EOIR continues to enforce nationwide notwithstanding contrary federal district court rulings. There is no indication that the Board is reconsidering or retreating from that holding as it continues to overturn bond orders issued by immigration judges..

42. Thus, even if Petitioner were to navigate the procedural barriers to reach the Board, the governing precedent compels denial of relief. Exhaustion is not required where the agency's controlling precedent forecloses relief as a matter of law.[10]

43. Under these circumstances, further administrative pursuit of relief is not merely inadequate—it is futile.

[9] *See Franco-Gonzalez*, 767 F.Supp. 2d at 1059.
[10] *See El Rescate Legal Servs., Inc. v. EOIR*, 959 F.2d 742, 747 (9th Cir. 1991).

44. Accordingly, this Court should expeditiously grant this petition, and order Petitioner's release from detention.

STATEMENT OF FACTS

45. Petitioner, Jesus Matias Sanchez is a citizen and national of Mexico who has been present in the United States for approximately eighteen (18) years. During this time, Petitioner has established deep family, economic, and community ties. He is the parent of two (2) United States citizen children and has long supported his family through consistent employment.

46. On or about April 15, 2026, Petitioner was apprehended by officers of U.S. Immigration and Customs Enforcement ("ICE"), Enforcement and Removal Operations ("ERO"), shortly after leaving home for work, just three miles from his home in Newark, Delaware. He was taken into immigration custody and is presently being held at the Philadelphia Federal Detention Center.

47. Prior to this arrest, Petitioner had not been the subject of any immigration enforcement action for decades despite his long-term presence in the United States. Petitioner has no criminal history that would render him subject to mandatory detention.

48. He is not subject to mandatory detention under any provision of the Immigration and Nationality Act ("INA"), including INA § 236(c) or INA § 241, 8 U.S.C. §§ 1226(c), 1231.

49. Petitioner's continued detention is not based on any statutory mandate, any criminal history, or any individualized finding of danger or flight risk, but solely on the government's present posture.

CLAIM FOR RELIEF

COUNT I

Violation of the INA:

Violation of the INA 8 U.S.C. § 1226

1. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.
2. Where Respondents have seized and detained a noncitizen whom Respondents have previously released from an initial period of detention pursuant to INA § 1226, Respondents are required by § 1226 to make an individualized determination as to the noncitizen's risk of flight and danger to the community.
3. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. As relevant here, it does not apply to those who previously entered the country and have been residing in the United States prior to being apprehended in the interior. Such noncitizens are detained under § 1226, unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.
4. Respondents' failure to make individualized determinations regarding Petitioner's possible risk of flight, and possible danger to the community violates the Immigration and Nationality Act, 8 U.S.C. § 1226.

COUNT II

Violation of Due Process

1. Petitioner repeats, re-alleges, and incorporates by reference each and every allegation in the preceding paragraphs as if fully set forth herein.
2. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart

of the liberty that the Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690, 121 S.Ct. 2491, 150 L.Ed.2d 653 (2001).

3. Petitioner has a fundamental interest in liberty and being free from official restraint.

4. The government's detention of Petitioner without meaningful access to bond redetermination to determine whether he is a flight risk or danger to others violates his right to due process.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

a. Assume jurisdiction over this matter;

b. Issue an order precluding Respondents from removing Petitioner from the jurisdiction;

c. Issue a writ of habeas corpus requiring that within one day, Respondents release Petitioner;

d. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

e. Grant any other and further relief that this Court deems just and proper.

DATED this 15th of April, 2026.

//s// Antonio A. Maturano, III
ANTONIO A. MATURANO
Attorney for Petitioner

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I, Antonio A. Maturano, III, submit this verification on behalf of the Petitioner as an attorney for Petitioner. I, or immigration counsel, have discussed with Petitioner's family the events described here-in. Based on those discussions, I hereby verify that the statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Date: April 15, 2026

//s// Antonio A. Maturano, III

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10/2024

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DESIGNATION FORM

Place of Accident, Incident, or Transaction: Philadelphia, PA

RELATED CASE IF ANY: Case Number:_____ Judge:_____

1. Does this case involve property included in an earlier numbered suit? Yes ☐
2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit? Yes ☐
3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit? Yes ☐
4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual? Yes ☐
5. Is this case related to an earlier numbered suit even though none of the above categories apply? If yes, attach an explanation. Yes ☐

I certify that, to the best of my knowledge and belief, the within case ☐ **is** / ☑ **is not** related to any pending or previously terminated action in this court.

Civil Litigation Categories

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☐ 9. Labor-Management Relations
- ☐ 10. Civil Rights
- ☒ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. Cases Seeking Systemic Relief ***see certification below***
- ☐ 16. All Other Federal Question Cases. *(Please specify)*:_____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (*Please specify*):_____
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: *(Please specify)*_____

I certify that, to the best of my knowledge and belief, that the remedy sought in this case ☐ **does** / ☑ **does not** have implications beyond the parties before the court and ☐ **does** / ☑ **does not** seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)

I certify that, to the best of my knowledge and belief:

☒ Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of $150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

☐ None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.

JS 44 (Rev. 12/12)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. *(SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)*

I. (a) PLAINTIFFS

JESUS MATIAS SANCHEZ

(b) County of Residence of First Listed Plaintiff PHILADELPHIA
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys *(Firm Name, Address, and Telephone Number)*
Antonio A. Maturano, III
Maturano & Associates, 616 Dekalb St., Norristown, PA 19401
Phone: (610) 313-3120

DEFENDANTS

Brian MCSHANE; Markwayne MULLIN; Todd BLANCHE; U.S. DHS; EOIR; J.L. JAMISON

County of Residence of First Listed Defendant
(IN U.S. PLAINTIFF CASES ONLY)
NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Attorneys *(If Known)*
U.S. Attorney for Eastern District of Pennsylvania
615 Chestnut Street, Philadelphia, PA 19106

II. BASIS OF JURISDICTION *(Place an "X" in One Box Only)*

- ☐ 1 U.S. Government Plaintiff
- ☐ 3 Federal Question *(U.S. Government Not a Party)*
- ☒ 2 U.S. Government Defendant
- ☐ 4 Diversity *(Indicate Citizenship of Parties in Item III)*

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	☐ 1	☐ 1	Incorporated *or* Principal Place of Business In This State	☐ 4	☐ 4
Citizen of Another State	☐ 2	☐ 2	Incorporated *and* Principal Place of Business In Another State	☐ 5	☐ 5
Citizen or Subject of a Foreign Country	☐ 3	☐ 3	Foreign Nation	☐ 6	☐ 6

IV. NATURE OF SUIT *(Place an "X" in One Box Only)*

CONTRACT
- ☐ 110 Insurance
- ☐ 120 Marine
- ☐ 130 Miller Act
- ☐ 140 Negotiable Instrument
- ☐ 150 Recovery of Overpayment & Enforcement of Judgment
- ☐ 151 Medicare Act
- ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans)
- ☐ 153 Recovery of Overpayment of Veteran's Benefits
- ☐ 160 Stockholders' Suits
- ☐ 190 Other Contract
- ☐ 195 Contract Product Liability
- ☐ 196 Franchise

REAL PROPERTY
- ☐ 210 Land Condemnation
- ☐ 220 Foreclosure
- ☐ 230 Rent Lease & Ejectment
- ☐ 240 Torts to Land
- ☐ 245 Tort Product Liability
- ☐ 290 All Other Real Property

TORTS

PERSONAL INJURY
- ☐ 310 Airplane
- ☐ 315 Airplane Product Liability
- ☐ 320 Assault, Libel & Slander
- ☐ 330 Federal Employers' Liability
- ☐ 340 Marine
- ☐ 345 Marine Product Liability
- ☐ 350 Motor Vehicle
- ☐ 355 Motor Vehicle Product Liability
- ☐ 360 Other Personal Injury
- ☐ 362 Personal Injury - Medical Malpractice

PERSONAL INJURY
- ☐ 365 Personal Injury - Product Liability
- ☐ 367 Health Care/ Pharmaceutical Personal Injury Product Liability
- ☐ 368 Asbestos Personal Injury Product Liability

PERSONAL PROPERTY
- ☐ 370 Other Fraud
- ☐ 371 Truth in Lending
- ☐ 380 Other Personal Property Damage
- ☐ 385 Property Damage Product Liability

CIVIL RIGHTS
- ☐ 440 Other Civil Rights
- ☐ 441 Voting
- ☐ 442 Employment
- ☐ 443 Housing/ Accommodations
- ☐ 445 Amer. w/Disabilities - Employment
- ☐ 446 Amer. w/Disabilities - Other
- ☐ 448 Education

PRISONER PETITIONS

Habeas Corpus:
- ☒ 463 Alien Detainee
- ☐ 510 Motions to Vacate Sentence
- ☐ 530 General
- ☐ 535 Death Penalty

Other:
- ☐ 540 Mandamus & Other
- ☐ 550 Civil Rights
- ☐ 555 Prison Condition
- ☐ 560 Civil Detainee - Conditions of Confinement

FORFEITURE/PENALTY
- ☐ 625 Drug Related Seizure of Property 21 USC 881
- ☐ 690 Other

LABOR
- ☐ 710 Fair Labor Standards Act
- ☐ 720 Labor/Management Relations
- ☐ 740 Railway Labor Act
- ☐ 751 Family and Medical Leave Act
- ☐ 790 Other Labor Litigation
- ☐ 791 Employee Retirement Income Security Act

IMMIGRATION
- ☐ 462 Naturalization Application
- ☐ 465 Other Immigration Actions

BANKRUPTCY
- ☐ 422 Appeal 28 USC 158
- ☐ 423 Withdrawal 28 USC 157

PROPERTY RIGHTS
- ☐ 820 Copyrights
- ☐ 830 Patent
- ☐ 840 Trademark

SOCIAL SECURITY
- ☐ 861 HIA (1395ff)
- ☐ 862 Black Lung (923)
- ☐ 863 DIWC/DIWW (405(g))
- ☐ 864 SSID Title XVI
- ☐ 865 RSI (405(g))

FEDERAL TAX SUITS
- ☐ 870 Taxes (U.S. Plaintiff or Defendant)
- ☐ 871 IRS—Third Party 26 USC 7609

OTHER STATUTES
- ☐ 375 False Claims Act
- ☐ 400 State Reapportionment
- ☐ 410 Antitrust
- ☐ 430 Banks and Banking
- ☐ 450 Commerce
- ☐ 460 Deportation
- ☐ 470 Racketeer Influenced and Corrupt Organizations
- ☐ 480 Consumer Credit
- ☐ 490 Cable/Sat TV
- ☐ 850 Securities/Commodities/ Exchange
- ☐ 890 Other Statutory Actions
- ☐ 891 Agricultural Acts
- ☐ 893 Environmental Matters
- ☐ 895 Freedom of Information Act
- ☐ 896 Arbitration
- ☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision
- ☐ 950 Constitutionality of State Statutes

V. ORIGIN *(Place an "X" in One Box Only)*

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District *(specify)* ☐ 6 Multidistrict Litigation

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:
28 USC 2241

Brief description of cause:
Alien detained by Respondents without due process of law.

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND $

CHECK YES only if demanded in complaint:
JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions): JUDGE _____ DOCKET NUMBER _____

DATE
04/15/2026

SIGNATURE OF ATTORNEY OF RECORD
//s// Antonio A. Maturano, III

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____