



SOUTHERN DISTRICT OF CALIFORNIA

Sebastian Pablo Alberto (A# 203-494-959),
Petitioners

v.

WARDEN, Imperial Regional Detention Facility,
Respondent

'26CV2489 JES BLM

Case No.: __ (A# 203-494-959) __

**PETITION FOR WRIT OF HABEAS CORPUS AND REQUEST FOR FEDERAL BOND HEARING
INTRODUCTION**

Petitioners challenge the legality of their continued detention under the Due Process Clause of the Fifth Amendment.

I. JURISDICTION

This Court has jurisdiction pursuant to 28 U.S.C. § 2241 because Petitioners are in custody within this district.

II. CUSTODY STATUS

Petitioners are detained at Eden Detention Center under ICE authority.

III. ARGUMENT

A. Prolonged Immigration Detention Violates Due Process

Under *Zadvydas v. Davis* and *Jennings v. Rodriguez*, prolonged detention raises constitutional concerns.

B. Lack of Individualized Bond Determination

Due process requires a meaningful opportunity to be heard.

C. Petitioners Are Neither a Flight Risk Nor a Danger

Petitioners present verified sponsor and stable housing.

D. Continued Detention Serves No Legitimate Purpose

Continued detention becomes punitive and unconstitutional.

IV. RELIEF REQUESTED

1. Immediate custody review
2. Federal bond hearing
3. Release under appropriate conditions

Respectfully submitted,

Sebastian Pablo Alberto (A# 203-494-959),

CERTIFICATE OF SERVICE

I certify that copies were mailed to all required parties via U.S. Mail.

Executed on this 17 day of April, 2026.

Signature: [signature]

DECLARATION UNDER PENALTY OF PERJURY

I, Alberto Sebastian Pabdo, declare as follows:

1. My name is Alberto Sebastian Pabdo.
2. I am the Petitioner in the above-referenced matter.
3. I am currently detained at
Imperial Regional Detention Facility 1572 Gateway R.
Calif. Co.,
CA
92231
4. I have personal knowledge of the facts stated in my Petition for Writ of Habeas Corpus.
5. The information contained in my Petition is true and correct to the best of my knowledge.
6. I am seeking relief from prolonged detention and request release or a bond hearing.

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

Executed on: April 17 / 2026

Signature: [Signature]

Printed Name: Alberto Sebastian Pabdo