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6 **Angelo Alessandro Codallo-Cambero**

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9 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT

10 Angelo Alessandro Codallo-Cambero,

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12 Petitioner,

13 v.

14 Patrick Divver, Field Office Director of
Enforcement and Removal Operations, San
15 Diego Field Office, Immigration and Customs
Enforcement; et al,

16 Respondents.
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Case No. **'26CV3566 JLS JAC**

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

1 Petitioner Angelo Alessandro Codallo-Camero, through counsel, petitions for a writ of
2 habeas corpus under 28 U.S.C. § 2241 and alleges:

3 I. INTRODUCTION

- 4 1. Petitioner seeks a writ of habeas corpus under 28 U.S.C. § 2241 because he is in federal
5 immigration custody and is being detained in violation of the Constitution and laws of the
6 United States.
- 7 2. Respondents' continued detention of Petitioner without a prompt, meaningful, and
8 individualized custody determination violates the Immigration and Naturalization Act,
9 the Administrative Procedure Act, and the Due Process Clause of the Fifth Amendment.
- 10 3. Petitioner requests expedited issuance of an Order to Show Cause pursuant to 28 U.S.C. §
11 2243; an order directing Respondents to release Petitioner immediately, or, in the
12 alternative, to provide a prompt constitutionally adequate custody hearing before a
13 neutral adjudicator at which the Government bears the burden of justifying continued
14 detention; and any further relief the Court deems just and proper.

15 II. JURISDICTION AND VENUE

- 16 4. This Court has jurisdiction under 28 U.S.C. § 2241 because Petitioner is "in custody"
17 under color of federal authority within this judicial district and alleges that such custody
18 violates the Constitution and laws of the United States.
- 19 5. This Court is authorized to grant habeas relief under 28 U.S.C. §§ 2241–2243.
- 20 6. To the extent Petitioner seeks relief under the Administrative Procedure Act in addition
21 to habeas relief, this Court also has jurisdiction under 28 U.S.C. § 1331.
- 22 7. Venue is proper in this District because Petitioner is detained within the South District of
23 California.

1 8. This Petition does not ask the Court to review the merits of any removal order, decide
2 Petitioner's protection claims, or adjudicate his immigration appeal. It challenges only
3 the legality of Petitioner's ongoing detention and the adequacy of the custody procedures
4 used to maintain that detention.

5 **III. REQUIREMENTS OF 28 U.S.C. §§ 2241 AND 2243**

6 9. Under 28 U.S.C. § 2243, this Court must either grant the writ or issue an Order to Show
7 Cause "forthwith" unless it appears from the petition that Petitioner is not entitled to
8 relief.

9 10. Habeas corpus is a fundamental mechanism for testing the legality of executive detention
10 and provides a swift and imperative remedy for unlawful restraint of liberty.

11 **IV. PARTIES**

12 11. Petitioner Angelo Alessandro Codallo-Camero is detained by the Department of
13 Homeland Security ("DHS"), through U.S. Immigration and Customs Enforcement
14 ("ICE"), at the Otay Mesa Detention Center ("OMDC") in San Diego, California.

15 12. Respondent Patrick Divver is the Field Office Director of ICE Enforcement and Removal
16 Operations, San Diego Field Office. In that official capacity, he is responsible for
17 Petitioner's immigration custody and continued detention within this District. He is sued
18 in his official capacity only.

19 13. Respondent Christopher J. LaRose is the Warden of the Otay Mesa Detention Center,
20 where Petitioner is detained. He has day-to-day physical custody of Petitioner and is sued
21 in his official capacity only.

1 14. Respondent Department of Homeland Security is the federal agency responsible for
2 implementing and enforcing the Immigration and Nationality Act, including the detention
3 and removal of noncitizens.

4 15. This Petition challenges Petitioner's present physical confinement under 28 U.S.C. §
5 2241. Respondents are the officials and agency responsible for Petitioner's custody and
6 continued detention.

7 **V. FACTUAL BACKGROUND**

8 16. Petitioner is a native and citizen of Venezuela.

9 17. Petitioner's full name is Angelo Alessandro Codallo-Cambero. His Alien Registration
10 Number is .

11 18. Petitioner entered the United States as a child (approximately 10 years old) on or about
12 June 2015 by plane, through Miami, Florida.

13 19. Petitioner has lived in the United States since childhood. He had filed Form I-589
14 application prior to detention and received employment authorization through that
15 application.

16 20. Petitioner also previously held Temporary Protected Status. According to DHS records,
17 USCIS approved Petitioner's TPS on or about June 30, 2022, and later withdrew TPS on
18 or about February 28, 2025.

19 21. Petitioner appeared for merits proceedings in Immigration Court on or about March 20,
20 2026. His application was denied, and he is appealing the immigration decision.

21 22. According to DHS records, on or about November 19, 2024, the Tenth Judicial Circuit
22 Court in and for Polk County, Florida, convicted Petitioner of aggravated assault under
23 Florida Statute § 784.021.

1 23. Petitioner was held in county jail for approximately five days and was then released on a
2 \$2,500 bond.

3 24. Petitioner was placed on probation. He had court every two to three months, was given
4 twenty-four months of probation, and was complying with his probation requirements.

5 25. On or about March 6, 2025, after approximately three months of complying with
6 probation, Petitioner's probation officer instructed him to report to address payment-
7 related issues. Petitioner appeared as instructed.

8 26. When Petitioner appeared, two ICE agents were present and detained him.

9 27. At the time ICE detained him, Petitioner was complying with probation and had reported
10 as instructed to address the payment issue.

11 28. Petitioner has remained detained in immigration custody since his arrest by ICE.

12 29. DHS issued Petitioner a Notice to Appear and charged him as removable under section
13 237(a)(1)(B) of the Immigration and Nationality Act.

14 30. Petitioner is not serving a criminal sentence. He is detained solely under federal
15 immigration authority.

16 31. Petitioner is pursuing appellate review of his immigration case and remains in active
17 immigration proceedings.

18 32. Petitioner has not received a constitutionally adequate custody determination before a
19 neutral decisionmaker at which the Government bears the burden of justifying continued
20 detention by clear and convincing evidence.

21 33. Petitioner's continued detention is severe because he entered the United States as a child,
22 has lived in the United States for many years, had a pending asylum application since
23 childhood, previously had TPS, previously had employment authorization, and was taken
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1 into ICE custody after reporting as instructed in connection with probation-related
2 payment issues.

3 34. Petitioner does not pose a danger to the community or a flight risk that would justify
4 continued civil detention without constitutionally adequate process. Any legitimate
5 government interest can be addressed through less restrictive alternatives, including
6 release on bond, supervision, reporting requirements, and compliance with all
7 immigration and criminal-court conditions.

8 35. Less restrictive alternatives are readily available and should have been considered before
9 continued detention was maintained. Those alternatives include release on bond,
10 supervision, periodic reporting, telephonic or electronic monitoring, residence
11 requirements, and continued compliance with all criminal-court and probation conditions.

12 36. Petitioner's pending immigration appeal gives him a concrete reason to appear for future
13 proceedings. He has pursued protection through the legal process, previously held TPS
14 and employment authorization, and has lived in the United States since childhood. These
15 facts are inconsistent with detention based on generalized assumptions about flight risk.

16 37. Those same facts also matter to any asserted danger finding. Petitioner was not serving a
17 criminal sentence when ICE detained him. The criminal court had released him on bond,
18 placed him on probation, and allowed him to remain in the community under supervision.
19 Respondents have not provided a reasoned explanation why immigration detention is
20 necessary despite those existing supervision mechanisms and despite the availability of
21 additional immigration conditions.

22 38. The facts following the conviction weigh heavily against treating Petitioner as a flight
23 risk. He was released from county custody on bond, placed on probation, appeared for
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1 court every two to three months, and complied with probation requirements. When
2 instructed to report to address payment-related issues, he appeared as instructed. ICE
3 detained him at that appointment, while he was complying with the criminal-court
4 process.

5 39. Petitioner's criminal conviction is serious, but it does not end the custody inquiry. Civil
6 immigration detention must be justified by present, individualized necessity. The relevant
7 question is whether Petitioner currently presents a danger or flight risk that cannot
8 reasonably be addressed through conditions of release, not whether Respondents can rely
9 on the existence of a conviction alone.

10 40. Previous Habeas Corpus case (1) 3:26-cv-02906-JES-AHG was dismissed on May 21,
11 2026, as there was a duplicative case (2) 3:26-cv-2559-JES-AHG in which Petitioner was
12 assigned an attorney. In the second petition, (2) 3:26-cv-2559-JES-AHG, the Court
13 denied habeas relief because, although the petitioner originally was detained under 8
14 U.S.C. § 1226(a), his removal order became final on April 21, 2026, after the BIA
15 rejected his attempted appeal, so his detention now falls under 8 U.S.C. § 1231. (3) 3:26-
16 cv-03428-BAS-DDL was dismissed because it was repetitive.

17 41. Since then, Respondent has filed an appeal and is reflected in the EOIR system.

18 42. This petition is not repetitive and addresses concerns regarding missing appeal in the
19 previous case (2) 3:26-cv-2559-JES-AHG.

20 VI. LEGAL FRAMEWORK

21 43. Immigration detention is civil and nonpunitive in nature and may be imposed only to
22 serve legitimate regulatory purposes, such as ensuring appearance at removal proceedings
23 or protecting the community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001); *Reno v.*
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1 *Flores*, 507 U.S. 292, 306 (1993). Detention that is excessive in relation to these
2 purposes, or that lacks adequate procedural safeguards, violates due process.

3 44. Noncitizens in removal proceedings are entitled to the protections of the Due Process
4 Clause of the Fifth Amendment. *Zadvydas*, 533 U.S. at 693; *Demore v. Kim*, 538 U.S.
5 510, 523 (2003). At minimum, due process requires a meaningful opportunity to contest
6 the factual and legal basis for continued civil confinement before a neutral
7 decisionmaker.

8 45. Where detention authority is exercised under 8 U.S.C. § 1226(a), custody determinations
9 must be individualized and must meaningfully assess whether continued detention is
10 necessary to address flight risk or danger to the community. The statute expressly
11 authorizes release on bond or conditional parole, and implementing regulations provide
12 for custody redetermination before an Immigration Judge. 8 U.S.C. § 1226(a); 8 C.F.R.
13 §§ 1236.1(d), 1003.19.

14 46. Because Petitioner is not subject to a final order of removal and is not serving a criminal
15 sentence, his detention must remain discretionary and individualized. Continued
16 detention without a meaningful custody determination is inconsistent with § 1226(a)'s
17 discretionary framework, particularly where Petitioner entered the United States as a
18 child, has lived in this country for many years, has had a pending I-589 application since
19 childhood, previously held TPS and employment authorization, appeared and complied
20 with criminal-court/probation requirements, and was taken into ICE custody after
21 reporting as instructed to address probation-related payment issues. Petitioner has not
22 received a neutral process that meaningfully tests whether detention is actually necessary,
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1 or whether release on bond or other conditions would reasonably address the
2 Government's stated interests.

3 47. *Matter of Guerra* further requires consideration of the individualized factors bearing on
4 custody, including fixed address, length of residence, family ties, employment history,
5 immigration history, criminal record, court appearance history, attempts to flee
6 prosecution, and the manner of entry. *Matter of Guerra*, 24 I. & N. Dec. 37, 40 (B.I.A.
7 2006). Those factors are directly relevant here because Petitioner entered as a child, lived
8 in the United States for many years, had TPS and employment authorization, appeared
9 for criminal-court and probation obligations, and has an ongoing immigration appeal.

10 48. Due process requires more than a formal opportunity to request custody review. Where a
11 noncitizen remains detained under § 1226(a), the custody determination must be neutral,
12 individualized, and supported by reliable evidence. The Government must justify
13 continued civil detention with a constitutionally adequate showing, and the
14 decisionmaker must consider whether bond or other less restrictive alternatives can
15 reasonably address any legitimate concern. See *Mathews v. Eldridge*, 424 U.S. 319
16 (1976); *Singh v. Holder*, 638 F.3d 1196, 1203–05 (9th Cir. 2011).

17 49. This Petition does not ask the Court to review the merits of Petitioner's removal
18 proceedings, decide his protection claims, or supervise the immigration case generally. It
19 challenges only the legality of Petitioner's present physical detention and the adequacy of
20 the custody process used to keep him confined.

21 VII. CLAIMS FOR RELIEF (HABEAS GROUNDS)

22 **Ground One: Violation of the Administrative Procedure Act — Abuse of Discretion**
23 **and Arbitrary and Capricious Continued Detention.**

1 50. Petitioner incorporates by reference all preceding paragraphs.

2 51. This Court has jurisdiction under 28 U.S.C. § 2241 to remedy unlawful federal custody,
3 including immigration custody maintained in violation of the Constitution or laws of the
4 United States. Petitioner also seeks relief under the Administrative Procedure Act, 5
5 U.S.C. § 701 et seq., to the extent Respondents' custody decision constitutes reviewable
6 agency action and no other adequate remedy provides complete relief.

7 52. Under the APA, a reviewing court must "hold unlawful and set aside agency action"
8 found to be "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance
9 with law." 5 U.S.C. § 706(2)(A).

10 53. Agency action is arbitrary and capricious where the agency fails to consider an important
11 aspect of the problem, offers an explanation that runs counter to the evidence, or reaches
12 a decision that is implausible in light of the record. *Motor Vehicle Mfrs. Ass'n of U.S.,*
13 *Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29 (1983); *Nat'l Ass'n of Home Builders*
14 *v. Defs. of Wildlife*, 551 U.S. 644 (2007).

15 54. To satisfy APA review, the agency must provide a reasoned explanation reflecting a
16 rational connection between the facts found and the choice made. *Dep't of Com. v. New*
17 *York*, 139 S. Ct. 2551 (2019).

18 55. Petitioner is not subject to a final order of removal, is not serving a criminal sentence, and
19 Respondents have not identified any valid basis for mandatory detention. His continued
20 confinement therefore must be justified by an individualized and reasoned custody
21 decision tied to legitimate regulatory purposes, not by detention as a default result of a
22 checkpoint arrest.

1 56. Respondents have detained and continued to detain Petitioner without a reasoned,
2 individualized assessment of his actual circumstances. Petitioner entered the United
3 States as a child, has lived in this country for many years, filed his I-589 application,
4 previously held TPS and employment authorization, complied with criminal-court and
5 probation requirements, and was taken into ICE custody only after reporting as instructed
6 to address probation-related payment issues. Those facts bear directly on whether
7 detention is actually necessary, yet Petitioner has not received a neutral custody process
8 that meaningfully weighs his history, compliance, ties to the United States, available
9 conditions of release, and the absence of any individualized finding that he presents a
10 danger or flight risk sufficient to justify continued civil detention.

11 57. Respondents have also failed to meaningfully consider whether any legitimate
12 governmental interest could be satisfied through less restrictive alternatives to detention,
13 including release on recognizance, bond, supervision, reporting requirements, or other
14 noncustodial conditions. This failure is especially unreasonable given Petitioner's deep
15 local ties, long residence, family responsibilities, employment history, and lack of any
16 individualized finding that detention is necessary.

17 58. Respondents likewise failed to explain why available noncustodial conditions would be
18 insufficient. A reasoned decision would address bond, supervision, reporting, electronic
19 or telephonic monitoring, residence requirements, continued probation compliance, and
20 other alternatives. The absence of that analysis renders the detention decision arbitrary as
21 applied to Petitioner.

22 59. Respondents' failure to provide a reasoned custody decision is especially significant
23 because the facts bearing on danger and flight risk point in different directions and
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1 therefore required explanation. Petitioner has a criminal conviction that Respondents may
2 consider, but he was released from criminal custody after approximately five days,
3 complied with probation, attended criminal-court proceedings, and appeared when
4 instructed to address a payment-related issue. A rational custody decision must reconcile
5 those facts before concluding that continued immigration detention is necessary.

6 60. By maintaining Petitioner's custody without a reasoned, individualized decision and
7 without procedures adequate to test the necessity of confinement as applied, Respondents
8 acted arbitrarily and capriciously and abused their discretion in violation of 5 U.S.C. §
9 706(2)(A).

10 61. Petitioner is entitled to habeas and APA relief setting aside Respondents' unlawful
11 custody decision as applied and ordering his immediate release.

12 **Ground Two: Violation of the Administrative Procedure Act — Not in Accordance**
13 **with Law, In Excess of Statutory Authority, and Without Observance of Required**
14 **Procedure.**

15 62. Petitioner realleges and incorporates all preceding paragraphs.

16 63. The APA requires a court to set aside agency action that is “not in accordance with law,”
17 “in excess of statutory jurisdiction, authority, or limitations,” or “without observance of
18 procedure required by law.” 5 U.S.C. § 706(2)(A), 5 U.S.C. § 706(2)(C), 5 U.S.C. §
19 706(2)(D).

20 64. Petitioner is not subject to a final order of removal, is not serving a criminal sentence, and
21 Respondents have not identified a valid basis for mandatory detention. His custody is
22 therefore governed by the discretionary detention framework applicable to noncitizens
23 detained during pending removal proceedings, including 8 U.S.C. § 1226(a).
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1 65. Under 8 U.S.C. § 1226(a), detention is not automatic. The statute authorizes DHS either
2 to detain the person or to release the person on bond or conditional parole. That authority
3 must be exercised within statutory limits and through a lawful, individualized decision
4 that accounts for the person's actual circumstances.

5 66. Respondents have maintained Petitioner's detention without providing a lawful custody
6 process consistent with 8 U.S.C. § 1226(a). On information and belief, Petitioner has not
7 received any written or oral custody determination identifying an individualized basis for
8 continued detention, and he has not received a meaningful opportunity to contest whether
9 his confinement is necessary.

10 67. To the extent Respondents rely on Petitioner's criminal conviction, the law still requires
11 an individualized custody determination. The relevant inquiry is not whether the
12 conviction exists in isolation, but whether the Government can justify present civil
13 detention and show that no reasonable condition or combination of conditions can
14 address any identified concern.

15 68. A custody process consistent with § 1226(a) must do more than acknowledge detention
16 authority. It must apply the discretionary framework Congress provided by considering
17 release on bond or conditional parole, weighing the individual's actual circumstances,
18 and explaining why continued custody is necessary. Treating detention as the default
19 despite Petitioner's compliance history, pending appellate review, prior TPS and
20 employment authorization, and available release conditions is inconsistent with §
21 1226(a)'s individualized structure.

22 69. Respondents' continued detention of Petitioner without a lawful individualized custody
23 determination is not in accordance with law, exceeds the lawful limits of discretionary
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1 detention under 8 U.S.C. § 1226(a), and/or was taken without observance of procedure
2 required by law, in violation of 5 U.S.C. § 706(2)(A), 5 U.S.C. § 706(2)(C), and 5 U.S.C.
3 § 706(2)(D).

4 70. Petitioner is entitled to habeas and APA relief setting aside Respondents' unlawful
5 custody decision as applied and ordering his immediate release.

6 **Ground Three: Violation of the Fifth Amendment Procedural Due Process — As-**
7 **Applied Challenge to Continued Civil Detention Without a Constitutionally**
8 **Adequate Custody Determination).**

9 71. Petitioner realleges and incorporates all preceding paragraphs.

10 72. The Due Process Clause prohibits the federal government from depriving any person of
11 liberty without due process of law. *U.S. Const. amend. V*; *Zadvydas v. Davis*, 533 U.S.
12 678 (2001); *Reno v. Flores*, 507 U.S. 292 (1993).

13 73. The Supreme Court has held that the INA cannot be rewritten by statutory interpretation
14 to impose an automatic schedule of bond hearings. However, *Jennings* does not foreclose
15 as-applied constitutional challenges to immigration detention, and Petitioner brings this
16 claim as an as-applied due process challenge to his continued civil confinement. *Jennings*
17 *v. Rodriguez*, 583 U.S. 131 (2018).

18 74. Petitioner is not subject to a final order of removal, is not serving a criminal sentence, and
19 Respondents have not identified a valid basis for mandatory detention. His detention is
20 therefore discretionary, not automatic, and continued custody must be supported by
21 constitutionally adequate procedures that meaningfully test whether confinement is
22 necessary as applied to him.

1 75. Because immigration detention is civil and nonpunitive, due process requires procedures
2 adequate to ensure that detention remains justified as applied to the individual. At
3 minimum, due process requires a meaningful opportunity to contest the factual and legal
4 basis for continued confinement before a neutral decisionmaker and to obtain an
5 individualized determination of whether detention is necessary to address flight risk or
6 danger. *Mathews v. Eldridge*, 424 U.S. 319 (1976).

7 76. Applying the *Mathews v. Eldridge*, 424 U.S. 319 (1976) balancing framework,
8 Petitioner's private liberty interest is substantial. Petitioner entered the United States at
9 approximately eleven years old and has lived in this country for many years. He
10 previously held TPS and employment authorization, pursued protection in immigration
11 proceedings, complied with criminal-court and probation requirements, and was taken
12 into ICE custody after reporting as instructed to address probation-related payment
13 issues. These facts should have been weighed in an individualized custody determination
14 before continued detention was imposed.

15 77. The risk of erroneous deprivation is high because Petitioner has remained detained
16 without a constitutionally adequate individualized custody determination that accounts
17 for his actual circumstances. Petitioner entered the United States at approximately eleven
18 years old, has lived in this country for many years, previously held TPS and employment
19 authorization, pursued protection in immigration proceedings, complied with criminal-
20 court and probation requirements, and was taken into ICE custody only after reporting as
21 instructed to address probation-related payment issues. On information and belief,
22 Respondents have not meaningfully weighed those facts, have not made a sufficient
23 individualized finding that continued detention is necessary, and have not considered
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1 whether less restrictive alternatives—such as bond, supervision, reporting requirements,
2 and compliance with all immigration and criminal-court conditions—would reasonably
3 address the Government’s interests.

4 78. The Government’s interests do not justify continued detention without adequate process.

5 Any legitimate interest in securing Petitioner’s appearance or protecting the community
6 can be addressed through less restrictive conditions, including release on recognizance,
7 bond, supervision, reporting requirements, or other noncustodial measures.

8 79. The lack of meaningful findings also prevents effective review. A conclusory custody
9 determination that does not address the evidence favoring release, the burden of proof,
10 ability to pay, and alternatives to detention does not provide the meaningful process
11 required by Mathews and Singh. It leaves Petitioner detained without a transparent
12 explanation of why civil confinement remains necessary in his individual case.

13 80. Even if Respondents identify some regulatory concern, due process requires
14 consideration of whether that concern can be addressed through less restrictive conditions
15 short of incarceration. Those conditions include a bond set in light of ability to pay,
16 supervised release, reporting requirements, telephonic or electronic check-ins, residence
17 requirements, continued compliance with criminal-court conditions, and any other
18 reasonable noncustodial measures. Continued detention is not constitutionally justified
19 unless Respondents can show that such alternatives are insufficient as applied to
20 Petitioner.

21 81. A person actively pursuing appellate review of an immigration decision has a concrete
22 incentive to appear and continue litigating his case. Petitioner is not attempting to avoid
23 the legal process; he is seeking review through the legal process. His long residence, prior
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1 lawful immigration-related status, employment authorization history, and demonstrated
2 compliance with court and probation requirements should have been weighed before
3 continued civil confinement was imposed.

4 82. The record also does not support a flight-risk finding. Petitioner lived in the United States
5 since childhood, pursued protection through the immigration system, previously held TPS
6 and employment authorization, and complied with criminal-court and probation
7 requirements. Most importantly, ICE detained him only after he appeared as instructed to
8 address a probation-related payment issue. That compliance history directly undermines
9 any conclusion that he is likely to abscond if released under appropriate conditions.

10 83. The record does not support continued detention based on present dangerousness without
11 a reasoned, individualized explanation. Petitioner's aggravated-assault conviction is
12 serious and relevant to the custody inquiry, but it cannot be treated as a substitute for the
13 required present-tense assessment. A constitutionally adequate custody process must
14 explain how the specific facts of that conviction, Petitioner's subsequent compliance with
15 criminal-court supervision, and the available conditions of release bear on whether he
16 currently presents a danger that cannot reasonably be managed outside detention.

17 84. Where detention is imposed or maintained without procedures sufficient to meaningfully
18 test whether continued confinement remains necessary, continued detention violates due
19 process as applied to Petitioner.

20 85. Petitioner is entitled to habeas relief ordering his immediate release.

21 **VIII. REQUEST FOR RELIEF**

22 86. Petitioner respectfully requests that the Court:
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1 A. Issue an Order to Show Cause under 28 U.S.C. § 2243 requiring Respondents to
2 respond forthwith;

3 B. Grant a writ of habeas corpus under 28 U.S.C. § 2241;

4 C. Order Petitioner released immediately;

5 D. Award Petitioner attorneys' fees and costs to the extent permitted by law; and

6 E. Grant such other and further relief as the Court deems just and proper.

7 DATED this June 15, 2026.

8 /s/ Jose Torres

9 Jose Torres

10 *Counsel for Petitioner*
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