UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA **DIVISION**

§ 2241 HABEAS CORPUS PETITION FORM
TO BE USED BY PRISONERS IN ACTIONS UNDER 28 U.S.C. § 2241 OR IN ACTIONS CHALLENGING REMOVAL PROCEEDINGS

SANDY RICARDO CHAVEZ, as next friend of DANIEL STEVEN GONZALEZ,

Inmate/Alien # Unknown / not provided

Walton County Jail, 40 Sheriff Circle, DeFuniak Springs, FL 32433

(Enter full name of Petitioner,
prison number or alien [A] number, if applicable,
AND address of place of confinement.)

vs.

CASE NO: 3:26-cv-4519-TKW-MAF
(To be assigned by Clerk)

SHERIFF / WARDEN / FACILITY ADMINISTRATOR OF WALTON COUNTY JAIL,

FIELD OFFICE DIRECTOR, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, ERO,

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT,

U.S. DEPARTMENT OF HOMELAND SECURITY,

(Enter name and title of each Respondent.
If additional space is required, use the blank
area below and directly to the right.)

ALL APPLICANTS MUST COMPLETE THIS ENTIRE FORM

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JUL 2 '26 AM 10:37

ANSWER ALL OF THE FOLLOWING:

1. This petition concerns (check where applicable):

   (a). ☐ a conviction
   (b). ☐ a sentence
   (c). ☐ prison disciplinary action or other action resulting in lost gain time credits
   (d). ☐ parole
   (e). ☒ immigration/removal
   (f). ☒ other (explain): ICE hold / immigration detention after state bond was paid

2. Provide the following information regarding the conviction(s) and sentence(s) for which you are presently incarcerated:

   (a). Name(s) and location(s) of court: N/A - immigration custody case; no conviction or sentence challenged.
   (b). Case Number(s): N/A / unknown from available records.
   (c). Charge(s) for which you were convicted: N/A - no conviction challenged; booking entries are allegations only.
   (d). What was your plea? (Check one) N/A - plea not provided; no conviction challenged here.
      (1) Not Guilty ☐
      (2) Guilty ☐
      (3) Nolo contendere ☐

   (e). Did you appeal from the judgment of conviction? Yes ☐ No ☒ N/A.

3. If you did appeal, answer the following:

   (a) Name of Court: N/A - no appeal from a judgment of conviction; this case challenges present custody.

   (b) Result: N/A.

   (c) Date of opinion and mandate (citation, if known): N/A.

4. Claims that challenge your conviction or imposition of sentence can only be raised by motion under 28 U.S.C. § 2255 unless the § 2255 motion is inadequate or ineffective to test the legality of your detention. If any of the grounds raised above challenge your conviction or sentencing:

   (a) Have you filed a motion under 28 U.S.C. § 2255?
   Yes ☐ No ☒

   If yes, please provide the case #, where filed, relevant date(s), and the results: N/A.

   No section 2255 motion applies because no federal conviction or sentence is challenged.

   (b). Explain why the remedy under § 2255 was or is inadequate or ineffective: N/A.

   This petition challenges current immigration-related detention after state bond was paid, not the validity of a federal conviction or sentence.

5. Are you currently represented by counsel in this case or in any other court case?

Yes ☐ No ☒

If yes, please explain: No counsel of record in this federal habeas case; spouse files as next friend.

6. If this case concerns removal proceedings:
(a) Date of final order of removal: None known / no final order provided.
(b) Did you file an appeal with the Board of Immigration Appeals? Yes ☐ No ☒

7. In the spaces below, set forth every ground which supports your claim that you are incarcerated unlawfully. Briefly summarize the specific facts in support of each ground raised. Conclusions that are not supported by specific facts are insufficient. You may attach additional pages if necessary to raise additional grounds or provide additional facts. Do not cite any law in your statement of facts.

(a). Ground one: Continued custody after state bond was paid.

Supporting FACTS (state *briefly* without citing cases or law):

Daniel Steven Gonzalez was booked on or about May 26, 2026. State bond was set and paid. Despite payment, he was not released and remains held at Walton County Jail because of an ICE hold, detainer, or ICE-related custody action.

Exhaustion:

[1] - Have you presented ground one to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s). Include any appeals:

[2]-(Answer only if you are challenging an issue related to removal (immigration) proceedings) - Did you present ground one to the Board of Immigration Appeals? Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s).

No adequate individualized custody hearing.

(b). Ground two:

Supporting FACTS (state *briefly* without citing cases or law):

Petitioner is informed that Mr. Gonzalez has not received a meaningful hearing before a neutral decision-maker to test whether continued detention is needed. The family has not received complete custody documents or a clear explanation of the basis for detention.

Exhaustion:

[1] - Have you presented ground one to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s). Include any appeals: _____

[2]-(Answer only if you are challenging an issue related to removal (immigration) proceedings) - Did you present ground one to the Board of Immigration Appeals? Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s).

ICE hold or detainer cannot justify indefinite local jail custody.

(c). Ground three: _____

Supporting FACTS (state *briefly* without citing cases or law): _____

After the state bond was paid, any continued local jail custody must rest on a valid immigration custody action. Petitioner has not been provided the detainer, warrant, notice to appear, custody decision, or transfer papers that justify continued detention.

Exhaustion:

[1] - Have you presented ground one to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s). Include any appeals: _____

[2]-(Answer only if you are challenging an issue related to removal (immigration) proceedings) - Did you present ground one to the Board of Immigration Appeals? Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s).

Mandatory detention, if claimed, must be supported by real records.

(d). Ground four: _____

Supporting FACTS (state *briefly* without citing cases or law): _____

Available information shows booking entries and pending allegations, not convictions. If the Government claims he must remain detained, it should identify and produce the specific records supporting that claim.

Exhaustion:

[1] - Have you presented ground one to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s). Include any appeals: _____

[2]-(Answer only if you are challenging an issue related to removal (immigration) proceedings) - Did you present ground one to the Board of Immigration Appeals? Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s).

Detention without notice and meaningful review is unlawful and harmful.

(e). Ground five: _____

Supporting FACTS (state *briefly* without citing cases or law): _____

Mr. Gonzalez remains separated from his spouse and cannot effectively gather documents, contact counsel, or prepare his criminal and immigration matters from detention. His spouse is willing to sponsor him at [redacted]

Exhaustion:

[1] - Have you presented ground one to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s). Include any appeals: _____

[2]-(Answer only if you are challenging an issue related to removal (immigration) proceedings) - Did you present ground one to the Board of Immigration Appeals? Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s).

Custody records should be produced and transfer should be prevented.

(f). Ground six: _____

Supporting FACTS (state *briefly* without citing cases or law): _____

Respondents possess the ICE hold, detainer, warrant, custody determination, bond records, and communications with the jail. Those records are needed to show the true basis for detention. Transfer during review could impair access to the Court and family.

Exhaustion:

[1] - Have you presented ground one to the Bureau of Prisons, either through the prison grievance system or other administrative proceeding?

Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s). Include any appeals: _____

[2]-(Answer only if you are challenging an issue related to removal (immigration) proceedings) - Did you present ground one to the Board of Immigration Appeals? Yes ☐ No ☒

If yes, please provide the results of the proceeding(s) and the relevant date(s).

_____

8. WHEREFORE, based upon the grounds raised above, Petitioner prays that the court will grant the following relief: Immediate release; or, alternatively, order to show cause, production of custody records, an expedited individualized custody/bond hearing, no-transfer protection, and any further relief required by law and justice.

I declare under penalty of perjury that I have read the above and the information contained herein is true and correct.

June 30, 2026 (Date)

SANDY RICARDO CHAVEZ, Next Friend

Signature of Petitioner

IF MAILED BY PRISONER:

I declare or state under penalty of perjury that this petition was (check one):

☐ delivered to prison officials for mailing, or ☐ deposited in the prison's internal mail system on:

_____(date).

Sandy Ricardo Ch.

Signature of Petitioner

Notary

Checked via Drivers License

John Nealey 7/1/26

Revised 01/13 admin/forms/jjl

JOHN NEALEY
Notary Public - State of Florida
Commission # HH 515194
My Comm. Expires Apr 14, 2028
Bonded through National Notary Assn.

OCHOA HERNÁNDEZ
ABOGADOS & ASOCIADOS

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

SANDY RICARDO CHAVEZ, as next friend of DANIEL STEVEN GONZALEZ,	Case No.: _____
Petitioner,	**EMERGENCY HABEAS CORPUS** 28 U.S.C. § 2241 28 U.S.C. § 2242 28 U.S.C. § 2243
v.	
SHERIFF / WARDEN / FACILITY ADMINISTRATOR OF WALTON COUNTY JAIL; FIELD OFFICE DIRECTOR, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT, ENFORCEMENT AND REMOVAL OPERATIONS; U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT; and U.S. DEPARTMENT OF HOMELAND SECURITY,	Immigration Detention / ICE Hold Request for Immediate Release or Prompt Hearing
Respondents.	

VERIFIED EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241, FILED BY SPOUSE AS NEXT FRIEND AND REQUEST FOR IMMEDIATE RELEASE, OR ALTERNATIVELY FOR AN ORDER TO SHOW CAUSE AND PROMPT INDIVIDUALIZED CUSTODY HEARING

Petitioner Sandy Ricardo Chavez, Colombian Citizenship Identification No. [redacted] residing at [redacted] respectfully files this Verified Emergency Petition for Writ of Habeas Corpus as next friend of her husband, Daniel Steven Gonzalez. Petitioner seeks immediate judicial review of Mr. Gonzalez's present custody at Walton County Jail, 40 Sheriff Circle, DeFuniak Springs, Florida 32433, following the payment of state criminal bond and the continuation of custody based on an immigration hold, detainer, request, transfer, or other asserted authority of U.S. Immigration and Customs Enforcement ("ICE").

This Petition does not ask this Court to decide the merits of any pending immigration charge, any removal defense, or any state criminal allegation. It asks a narrower and urgent constitutional question: whether the Government and/or the jail may continue to restrain Daniel Steven Gonzalez's liberty after state bond has been satisfied, without a lawful custody determination, without a constitutionally adequate and individualized assessment of flight risk or danger, and without prompt judicial review of the authority under which he is being held.

Petitioner requests immediate release. In the alternative, Petitioner requests that this Court forthwith issue an order to show cause, require Respondents to produce and certify the true legal basis for detention, require production of the relevant immigration custody documents, and set an expedited hearing at which the Court or the appropriate neutral decision-maker may determine whether continued detention is lawful, necessary, and constitutionally proportionate.

I. NATURE OF THE ACTION AND EMERGENCY RELIEF REQUESTED

1. This is a petition for a writ of habeas corpus under 28 U.S.C. § 2241, filed by a spouse as next friend under 28 U.S.C. § 2242, challenging the present restraint on the liberty of Daniel Steven Gonzalez.

2. The immediate problem is not the existence of a prior arrest or booking. The immediate problem is that Mr. Gonzalez, after being granted state bond and after that bond was paid, remains confined because of an ICE hold, immigration detainer, federal custody assumption, or other immigration-related restraint whose factual and legal basis must be tested by habeas review.

3. The petition is emergency in nature because continued physical confinement is the most severe civil restraint the Government can impose short of criminal punishment. Every day of unauthorized detention causes irreparable harm to the detained person and to his family, including his spouse, who brings this Petition to secure meaningful access to the Court.

4. Petitioner seeks: (a) immediate release from unlawful custody; (b) in the alternative, a prompt order to show cause under 28 U.S.C. § 2243; (c) production of the detainee and all records supporting custody; (d) a prompt individualized hearing before a neutral decision-maker; (e) an order prohibiting transfer outside this District without prior notice to the Court and Petitioner while this Petition is pending; and (f) any further relief that law and justice require.

5. This Petition is drafted on information and belief based on the facts available to the spouse. If Respondents contend that any fact is incomplete or disputed, the proper remedy is not summary rejection but a prompt return, production of the custody file, and a hearing, because the Government possesses the material documents necessary to explain the actual legal basis for continued detention.

II. PARTIES

A. PETITIONER AND NEXT FRIEND

6. Petitioner Sandy Ricardo Chavez is the lawful spouse of Daniel Steven Gonzalez. She identifies herself with Colombian Citizenship Identification No. [redacted] and resides at [redacted]

7. Ms. Chavez files this action as next friend because Mr. Gonzalez is detained, has materially limited access to court, documents, communication, and legal resources, and is not in a practical position to prepare, verify, and file an emergency habeas petition on his own without assistance.

8. Ms. Chavez does not purport to act as a licensed attorney. She invokes the statutory next-friend mechanism recognized by 28 U.S.C. § 2242 and the common-law habeas doctrine governing next-friend standing, and she acts solely to protect her husband's liberty and preserve access to judicial review.

B. DETAINED PERSON

9. Daniel Steven Gonzalez is a male detainee whose booking information reflects a booking date of May 26, 2026. Available records identify charges or booking entries including: "hold ICE," "public order crimes - state emergency - engage contracting business without certification," and "fraud - imperson contractor during state of emergency."

10. Petitioner expressly pleads these matters as booking entries and allegations, not as convictions and not as admissions of guilt. The state criminal case is not the object of this habeas petition except insofar as state bond was granted and paid, thereby removing state criminal bond as the continuing justification for confinement.

11. On information and belief, Mr. Gonzalez is presently confined at Walton County Jail, 40 Sheriff Circle, DeFuniak Springs, Florida 32433.

C. RESPONDENTS

12. Respondent Sheriff, Warden, or Facility Administrator of Walton County Jail is the immediate physical custodian of Mr. Gonzalez and is the person or office that can produce the body of the detainee and implement a release order or show the authority for continued custody.

13. Respondent Field Office Director, U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations, is included because the continued restraint appears to arise from an ICE hold, ICE detainer, ICE custody request, ICE warrant, ICE charging decision, or ICE custody determination.

14. Respondents U.S. Immigration and Customs Enforcement and the U.S. Department of Homeland Security are included to the extent they are asserting federal immigration authority as the basis for the continued restraint.

15. If Respondents contend that a different official is the proper immediate custodian, Petitioner respectfully requests substitution, joinder, or amendment rather than dismissal, because the petition plainly challenges the present restraint and identifies the facility where the detainee is being held.

III. JURISDICTION AND VENUE

16. This Court has jurisdiction under 28 U.S.C. § 2241 because Mr. Gonzalez is in custody within the territorial jurisdiction of the United States District Court for the Northern District of Florida, and the Petition challenges the legality of that custody.

17. Under 28 U.S.C. § 2242, an application for a writ of habeas corpus may be signed and verified by the person for whose relief it is intended or by someone acting on his behalf. Ms. Chavez files as someone acting on behalf of her detained husband and provides the factual basis for next-friend standing below.

18. Under 28 U.S.C. § 2243, the writ or an order to show cause must be directed to the person having custody of the person detained, and the custodian must certify the true cause of detention. This Petition therefore names the jail custodian and the federal immigration officials whose asserted authority is causing or maintaining the restraint.

19. Venue is proper in the Northern District of Florida, Pensacola Division, because Mr. Gonzalez is confined at Walton County Jail in Walton County, Florida, and Walton County is served by the Pensacola Division of this District.

20. This Petition does not seek review of a final order of removal. It challenges the present detention and the asserted authority to keep Mr. Gonzalez imprisoned after state bond was paid. It therefore falls within the core function of habeas corpus: testing the legality of custody.

21. To the extent Respondents invoke 8 U.S.C. § 1226(e), Petitioner does not ask the Court to second-guess a discretionary bond amount or discretionary weighing of evidence. Petitioner challenges the legal and constitutional authority to detain Mr. Gonzalez without a valid custody basis, without a prompt individualized hearing, and without the procedural safeguards required by due process.

IV. STATEMENT OF RELEVANT FACTS

22. Daniel Steven Gonzalez was booked on or about May 26, 2026. Booking information provided to Petitioner identifies a male detainee and includes entries reflecting state criminal allegations and an ICE hold.

23. The state criminal allegations reflected in the booking information include alleged public order crimes related to engaging in contracting business without certification during a state emergency, and an alleged fraud or impersonation contractor charge during a state of emergency.

24. Petitioner understands that a state bond was set in relation to the state criminal charges and that the bond was paid. Payment of the state bond means that, as to the state criminal case, Mr. Gonzalez satisfied the monetary condition imposed for release by the state court, subject to any ordinary state court conditions that may exist.

25. Notwithstanding payment of the state bond, Mr. Gonzalez was not released to his family. Instead, he remained in custody or was taken into immigration custody as a result of an ICE hold, immigration detainer, federal immigration request, or related immigration action.

26. On information and belief, the present restraint is not based on an unpaid state bond. The restraint is based on ICE-related custody, an ICE hold, an ICE detainer, an immigration warrant, or an alleged immigration custody determination.

27. Petitioner has not been provided a complete and adequate explanation of the legal basis for continued custody, including whether ICE is relying on 8 U.S.C. § 1226(a), § 1226(c), § 1225(b), § 1231, an administrative warrant, a Notice to Appear, a Form I-247 detainer, a Form I-200 warrant, a Form I-203 order to detain or release, a Form I-286 custody determination, or some other document.

28. Petitioner is informed and believes that Mr. Gonzalez has not received a constitutionally adequate individualized hearing in which a neutral decision-maker considered whether continued detention is necessary based on current evidence of danger or flight risk.

29. Petitioner is further informed and believes that the Government has not made a court-tested showing that Mr. Gonzalez falls within any mandatory detention category that would foreclose a custody or bond hearing. Booking entries and charges are not the same as convictions, and the Government must identify the precise statutory basis if it claims mandatory detention.

30. Mr. Gonzalez has a spouse willing to appear, assist, receive notices, support compliance, and facilitate any conditions of release. Ms. Chavez resides at [redacted] within practical reach of the district where he is confined.

31. The continued detention separates a husband from his spouse, prevents him from preparing his defense and immigration case from liberty, restricts access to documents and witnesses, and imposes a severe deprivation of liberty that requires immediate judicial scrutiny.

32. Because the Government and the jail possess the custody paperwork and Petitioner does not, the petition requests that Respondents be ordered to file a prompt return identifying every document, statute, regulation, warrant, detainer, and custody decision on which they rely.

V. THE WIFE'S AUTHORITY TO PROCEED AS NEXT FRIEND

A. STATUTORY BASIS UNDER 28 U.S.C. § 2242

33. The federal habeas statute expressly contemplates that a petition may be filed by a person acting on behalf of the detainee. 28 U.S.C. § 2242 states that an application for a writ of habeas corpus shall be in writing and signed and verified by the person for whose relief it is intended "or by someone acting in his behalf."

34. This language is important. It reflects the historic function of habeas corpus as a swift remedy for unlawful restraint, and it recognizes that a detained person may be physically unable, practically unable, or materially obstructed from preparing and filing the petition personally.

35. Here, Ms. Chavez is not a stranger to the litigation. She is the detained person's spouse. Her purpose is not ideological, speculative, or academic; it is direct, familial, immediate, and grounded in her husband's personal liberty.

B. CONSTITUTIONAL AND COMMON-LAW NEXT-FRIEND REQUIREMENTS

36. The Supreme Court's next-friend doctrine requires a proposed next friend to show, in substance, two things: first, an adequate explanation why the real party in interest cannot appear on his own behalf, such as inaccessibility, mental incapacity, lack of access to court, or similar disability; and second, that the next friend is truly dedicated to the best interests of the person on whose behalf relief is sought and ordinarily has a significant relationship with that person. Whitmore v. Arkansas, 495 U.S. 149, 163-64 (1990).

37. Both requirements are met here. First, Mr. Gonzalez is incarcerated at a county jail under an asserted ICE hold or immigration custody basis. Detention materially limits communication, access to legal materials, access to documents, ability to prepare pleadings, ability to verify facts, and ability to file an emergency petition quickly.

38. Second, Ms. Chavez is Mr. Gonzalez's wife. A spouse is among the strongest possible next-friend relationships because marriage ordinarily establishes a close, continuing, personal, legally recognized, and fiduciary-like relationship of trust and care.

39. Ms. Chavez's interests are aligned with Mr. Gonzalez's liberty interests. She seeks release, or at minimum a prompt neutral review of custody, not any relief adverse to him. She has no conflict of interest and is not attempting to waive any substantive defense, immigration defense, or criminal defense on his behalf.

40. Ms. Chavez is also the person with practical ability to obtain documents, communicate with family members, contact counsel, provide a residence, and support compliance with any release conditions. These facts show dedication to Mr. Gonzalez's best interests and practical necessity for next-friend intervention.

C. DETENTION CREATES PRACTICAL INABILITY TO FILE DIRECTLY

41. The inability requirement does not require a showing that the detained person is permanently incompetent. It is enough that circumstances materially prevent meaningful direct access to the Court in the urgent posture of habeas corpus.

42. In this case, Mr. Gonzalez is physically confined. He is dependent on jail communication systems. He may not have immediate access to a printer, scanner, legal forms, law library resources, immigration documents, state bond receipts, booking records, or federal court filing procedures. He also may not know the correct custodian or the legal theory under which ICE claims authority to detain him.

43. Those limitations are not theoretical. They are precisely the conditions that make the next-friend device necessary in emergency custody litigation. Requiring a detained person to personally draft and file a legally sufficient habeas petition while the Government controls the custody records would elevate form over the Great Writ's core purpose.

44. Ms. Chavez therefore satisfies the first Whitmore requirement because detention, limited access to court, limited access to legal resources, and the emergency nature of the liberty deprivation create a real and substantial barrier to Mr. Gonzalez filing on his own behalf.

D. SIGNIFICANT RELATIONSHIP, GOOD FAITH, AND BEST INTERESTS

45. Ms. Chavez satisfies the second Whitmore requirement because she is Mr. Gonzalez's wife and seeks relief entirely consistent with his best interests: release from unlawful custody, or at minimum a prompt hearing at which the Government must justify detention.

46. Her relationship is not merely social or remote. It is marital, immediate, and legally recognized. As spouse, she is a natural person to seek judicial protection when her husband's liberty is restrained and he cannot effectively access the court himself.

47. Ms. Chavez acts in good faith. She does not seek damages. She does not seek to interfere with the merits of any criminal or immigration proceeding. She seeks only to require the custodian to justify the restraint and to obtain the release or hearing that due process requires.

48. If the Court believes additional factual detail is required, Petitioner respectfully requests leave to supplement with a declaration, marriage certificate, identification documents, bond receipt, booking printout, or any additional document the Court considers necessary. Next-friend defects, if any, should be cured by supplementation rather than dismissal where the detained person's liberty is at stake and the spouse has made a substantial showing of relationship and necessity.

E. ALTERNATIVE REQUEST TO CURE SIGNATURE OR REPRESENTATION ISSUES

49. Petitioner recognizes that a non-attorney next friend may invoke habeas under § 2242 but may face limits on litigating as counsel. Accordingly, if the Court determines that Mr. Gonzalez must personally sign, verify, or ratify the Petition, Petitioner requests an order directing the jail to provide immediate confidential access for signature or ratification, or permitting amendment after the Court issues an order to show cause.

50. If the Court determines that counsel admitted in this District must appear for further litigation, Petitioner requests that the Petition not be dismissed at the threshold. The Court should preserve the habeas filing, order the custodian to respond, and allow reasonable time for counsel to appear or for the detained person to ratify the petition personally.

VI. LEGAL FRAMEWORK GOVERNING IMMIGRATION DETENTION AND HABEAS REVIEW

A. HABEAS CORPUS UNDER 28 U.S.C. § 2241

51. Section 2241 authorizes federal courts to grant habeas relief to a person in custody in violation of the Constitution, laws, or treaties of the United States. The writ is designed to provide a prompt judicial inquiry into the legal basis of confinement.

52. The relevant inquiry is not whether the Government has some immigration interest in Mr. Gonzalez. The inquiry is whether the present custody is lawful under the particular statute and regulation being invoked, and whether continued detention satisfies the Due Process Clause.

53. A person held in immigration custody is "in custody" for purposes of § 2241. Physical confinement in a county jail based on an ICE hold, ICE detainer, or ICE custody decision is a paradigmatic custody restraint.

B. IMMEDIATE CUSTODIAN AND DISTRICT OF CONFINEMENT

54. Habeas practice generally requires naming the immediate custodian and filing in the district of confinement. Because Mr. Gonzalez is held at Walton County Jail, the jail custodian is an appropriate respondent and this District is the proper forum.

55. Immigration detention cases sometimes also include federal immigration officials who control the legal basis for confinement. That is appropriate here because the continued restraint appears to be caused by ICE, even though the physical place of confinement is a county jail.

56. Naming both the immediate jail custodian and the federal immigration officials avoids procedural confusion and ensures that the official with physical control and the officials with legal control can each be ordered to justify the detention.

C. ICE DETAINERS, HOLDS, AND CUSTODY DETERMINATIONS

57. An immigration detainer is not itself a criminal sentence and is not a substitute for a lawful custody determination. Federal regulation describes a detainer as a notice or request advising another law enforcement agency that DHS seeks custody for immigration purposes.

58. Under 8 C.F.R. § 287.7(d), when DHS requests temporary detention of a person not otherwise detained by a criminal justice agency, the requested detention period may not exceed 48 hours, excluding Saturdays, Sundays, and holidays, to permit DHS to assume custody. If the state basis for custody has ended by payment of bond, continued holding must be justified by valid federal authority, not by an indefinite detainer label.

59. Under 8 C.F.R. § 287.3(d), immigration authorities must make a custody determination within 48 hours of arrest, except in emergency or extraordinary circumstances, as to whether the person will be continued in custody, released on bond, released on recognizance, and whether a Notice to Appear and warrant of arrest will issue.

60. Thus, if the jail is still holding Mr. Gonzalez after the state bond was paid, Respondents must identify whether the jail is holding him temporarily on a detainer, whether ICE has assumed custody, whether an immigration warrant exists, whether a Notice to Appear exists, whether a Form I-286 custody determination was served, and whether any bond or recognizance decision has been made.

D. DETENTION PENDING REMOVAL PROCEEDINGS UNDER 8 U.S.C. § 1226

61. If Mr. Gonzalez is detained pending a decision on whether he is to be removed, the likely statutory framework is 8 U.S.C. § 1226, unless Respondents prove that some other statute governs.

62. Section 1226(a) provides discretionary authority to arrest and detain a noncitizen pending removal proceedings and permits release on bond or conditional parole. If § 1226(a) governs, detention should be accompanied by an individualized custody determination and meaningful opportunity to seek release.

63. Section 1226(c) creates mandatory detention for specified categories of noncitizens, generally tied to particular criminal grounds. If Respondents claim § 1226(c), they must identify the exact subsection and factual predicate. A booking charge, by itself, is not the same as a qualifying conviction or mandatory detention predicate.

64. Petitioner does not concede that § 1226(c) applies. Based on the facts presently known to the spouse, the record reflects charges and an ICE hold, not a qualifying conviction. If Respondents rely on mandatory detention, the Court should require them to prove that the statutory predicate exists and to provide the records on which they rely.

65. Even when Congress authorizes civil immigration detention, due process limits arbitrary, punitive, or unreasonably prolonged confinement. The Government must connect detention to a legitimate regulatory purpose and must provide adequate procedures for testing whether that purpose actually justifies custody in the individual case.

E. HABEAS REVIEW REMAINS AVAILABLE FOR CONSTITUTIONAL AND LEGAL CHALLENGES

66. The Government may not avoid habeas review by labeling the detention decision discretionary. Section 1226(e) limits review of discretionary judgments regarding detention or release, but it does not bar legal or constitutional challenges to the statutory framework or to detention beyond lawful authority.

67. This Petition challenges the legality of custody, the absence of adequate process, and the lack of a demonstrated statutory basis after state bond was paid. Those are core habeas questions.

68. At minimum, the Court should require Respondents to make a return explaining the true cause of detention, including the precise statute and documents relied upon, so that the Court may determine whether the custody is lawful.

VII. CONSTITUTIONAL RIGHTS CONCULCATED AND VIOLATED

A. FIFTH AMENDMENT LIBERTY INTEREST AND SUBSTANTIVE DUE PROCESS

69. The Fifth Amendment protects persons within the United States from deprivation of liberty without due process of law. Physical detention is the clearest deprivation of liberty.

70. Civil immigration detention is not criminal punishment. Its permissible purpose is regulatory: to ensure appearance in immigration proceedings, protect the community where legally supported, and effectuate removal where removal is legally authorized. When detention becomes automatic, unsupported, indefinite, or divorced from individualized necessity, it violates substantive due process.

71. Mr. Gonzalez's state bond was paid. The state court's bond decision indicates that the state criminal process did not require his continued incarceration on an unpaid bond. If the federal Government now claims a separate civil immigration basis to hold him, it must provide a lawful and individualized basis for that restraint.

72. Continued confinement solely because an ICE hold exists, without a valid custody determination and without testing whether Mr. Gonzalez is a current danger or flight risk, is arbitrary and excessive in relation to the civil purposes of immigration detention.

73. The Supreme Court has repeatedly recognized that immigration detention raises serious constitutional concerns when it is not reasonably limited and reasonably related to its purpose. The Constitution does not permit a person physically present in the United States to be imprisoned under a conclusory label without meaningful process.

B. FIFTH AMENDMENT PROCEDURAL DUE PROCESS

74. Procedural due process requires notice, a meaningful opportunity to be heard, and a neutral decision-maker before the Government may continue a severe liberty deprivation, unless a narrowly justified emergency exists and prompt post-deprivation review is provided.

75. Petitioner alleges that Mr. Gonzalez has not received a constitutionally adequate individualized custody hearing at which the Government identified the legal basis for detention and proved that detention remains necessary.

76. The procedural defect is especially serious because the state bond was paid. Once state criminal custody no longer independently justifies confinement, the federal immigration basis must stand on its own. Respondents should not be allowed to rely on ambiguity between state custody and immigration custody to keep a person jailed.

77. A meaningful hearing must address the actual reasons for detention, including whether Mr. Gonzalez is subject to mandatory detention, whether he is eligible for bond or recognizance, whether he is a danger, whether he is a flight risk, whether there are less restrictive alternatives, whether he has a stable address and spouse support, and whether the Government has served the required immigration documents.

78. If the Government has not provided notice of the custody determination, the Notice to Appear, the warrant, the detainer, or the statutory basis for mandatory detention, Mr. Gonzalez cannot meaningfully challenge his confinement. Lack of notice and lack of a hearing are classic procedural due process violations.

C. SUSPENSION CLAUSE AND THE FUNDAMENTAL RIGHT TO HABEAS REVIEW

79. The Suspension Clause preserves the privilege of the writ of habeas corpus except in narrow circumstances not present here. Habeas exists to test the legality of executive detention.

80. The writ is especially important where a detainee is held by a combination of local jail custody and federal immigration authority, because without judicial review the detainee may be passed between systems without any court requiring a clear answer to the question: by what authority is this person held?

81. The Court should therefore exercise habeas jurisdiction to require Respondents to show the true cause of detention and to release Mr. Gonzalez unless that cause is lawful, documented, and constitutionally sufficient.

D. RIGHT OF ACCESS TO COURTS

82. Detention cannot be administered in a way that eliminates practical access to court. Mr. Gonzalez's physical confinement, communication limits, and lack of immediate access to documents make it necessary for his spouse to invoke the Court's jurisdiction as next friend.

83. The right of access to court supports accepting this next-friend filing, ordering a prompt response, and allowing amendment or ratification if the Court requires additional formalities. The Great Writ should not be defeated by the practical obstacles that detention itself creates.

E. PROTECTION AGAINST PUNITIVE CIVIL DETENTION

84. The continued custody is civil if it is immigration custody. Civil custody cannot be used as punishment for pending state charges, and it cannot be used to nullify the state court's bond decision without an independent federal basis.

85. If ICE has concerns about appearance or public safety, those concerns must be tested in an individualized proceeding and can often be addressed by less restrictive alternatives, including bond, reporting, electronic monitoring where lawful, sponsor supervision, address verification, and compliance conditions.

86. A categorical refusal to release or even to provide a hearing, particularly where the available information reflects charges rather than convictions, is disproportionate and constitutionally suspect.

F. FAMILY INTEGRITY AND PRACTICAL EQUITIES

87. The principal constitutional right asserted belongs to Mr. Gonzalez: liberty from unlawful custody. Nevertheless, the Court may consider the real-world harm to family unity and marital support when assessing urgency and the availability of less restrictive alternatives.

88. Ms. Chavez is ready to support release, receive him, assist with court appearances, help secure counsel, and facilitate compliance with all lawful conditions. Her presence reduces flight risk and supports a finding that detention is not necessary if reasonable conditions can be imposed.

VIII. GROUNDS FOR RELIEF

GROUND ONE: CONTINUED CUSTODY AFTER PAYMENT OF STATE BOND REQUIRES AN INDEPENDENT FEDERAL LEGAL BASIS

89. The state bond was paid. Therefore, continued custody cannot be justified by the mere fact of state charges if the state court's release condition was satisfied.

90. If Mr. Gonzalez is now held because of ICE, Respondents must show the independent federal legal basis for detention. That basis must be more than the words "ICE hold." It must identify a statute, regulation, warrant, detainer, custody decision, and factual predicate.

91. A federal immigration hold cannot operate as an indefinite substitute for a lawful custody determination. If ICE has not assumed lawful custody and if no valid federal warrant or custody decision supports continued detention, Mr. Gonzalez must be released immediately.

92. If ICE has assumed custody, then the Government must prove under which statutory authority it detains him and whether he has received the process required by that authority and by the Due Process Clause.

GROUND TWO: IF DETAINED UNDER 8 U.S.C. § 1226(A), MR. GONZALEZ IS ENTITLED TO A MEANINGFUL CUSTODY DETERMINATION AND RELEASE UNLESS DETENTION IS NECESSARY

93. Section 1226(a) permits detention pending removal proceedings but also permits release on bond or conditional parole. Where § 1226(a) applies, detention is not mandatory in the same sense as § 1226(c).

94. The Government should be required to provide a prompt individualized bond or custody hearing, and the decision-maker should consider whether Mr. Gonzalez presents a current danger or flight risk, whether a state judge already allowed release on bond, whether he has a stable residence, whether his spouse can serve as sponsor, and whether less restrictive alternatives can secure appearance.

95. Petitioner requests immediate release because the continued detention appears unsupported and because state bond was paid. Alternatively, Petitioner requests an expedited hearing at which the Government must justify detention.

GROUND THREE: IF RESPONDENTS CLAIM MANDATORY DETENTION UNDER 8 U.S.C. § 1226(C), THEY MUST PROVE THE STATUTORY PREDICATE

96. Petitioner does not concede that § 1226(c) applies. The available information shows booking entries and charges, not convictions or established statutory predicates.

97. If Respondents assert § 1226(c), they must identify the precise statutory subsection and produce the records establishing that Mr. Gonzalez falls within it. A bare booking description is not enough.

98. If the Government relies on an alleged qualifying conviction, it must provide the judgment of conviction, statute of conviction, charging document, plea or verdict, sentence, and any categorical or modified categorical analysis necessary to establish the immigration consequence.

99. If the Government cannot establish mandatory detention, Mr. Gonzalez must receive a custody hearing or be released under reasonable conditions.

GROUND FOUR: ICE DETAINER PRACTICE CANNOT JUSTIFY INDEFINITE LOCAL JAIL CUSTODY AFTER STATE BOND IS PAID

100. If the jail is holding Mr. Gonzalez only on an ICE detainer after state bond was paid, the detention must comply with the limits and purpose of the detainer regulation.

101. An ICE detainer is designed to give DHS a limited opportunity to assume custody. It is not an open-ended authorization for a local jail to continue detention indefinitely after the state custody basis ends.

102. If more than the limited detainer period has elapsed after satisfaction of state bond and ICE has not lawfully assumed custody, continued detention is unlawful and release is required.

103. If ICE has assumed custody but uses the county jail as the place of confinement, Respondents must provide the federal custody documents and identify the federal officer responsible for the detention.

GROUND FIVE: THE LACK OF PROMPT REVIEW VIOLATES DUE PROCESS AND REQUIRES HABEAS RELIEF

104. Due process requires a fair procedure proportionate to the liberty interest at stake. Mr. Gonzalez's physical confinement is severe, ongoing, and irreparable.

105. The Government's generalized interest in immigration enforcement does not eliminate the need for individualized process. The Government must show that continued detention is necessary for this person, based on current facts and lawful criteria.

106. A prompt hearing is particularly necessary because Mr. Gonzalez has already satisfied state bond. That fact materially changes the custody posture and undermines any assumption that state custody independently supports confinement.

107. Habeas relief should therefore issue, either in the form of immediate release or an order requiring Respondents to justify custody and provide a prompt individualized hearing.

GROUND SIX: THE COURT SHOULD ORDER PRODUCTION OF CUSTODY RECORDS

108. Petitioner cannot fully plead the custody basis because Respondents possess the relevant records. Those records likely include the ICE detainer, administrative warrant, custody determination, Notice to Appear, transfer or hold paperwork, jail booking record, state bond record, and communications between ICE and the jail.

109. A habeas return must certify the true cause of detention. The Court should require Respondents to produce all records necessary to determine whether custody is lawful.

110. Without these records, the detained person and his spouse are forced to litigate in the dark while the Government continues to control the body of the detainee. Habeas does not permit such opacity.

IX. REQUESTED STANDARD FOR ANY HEARING

111. Petitioner requests immediate release because the available facts show that state bond was paid and no adequate immigration custody process has been provided.

112. If the Court does not order immediate release, Petitioner requests an expedited hearing at which Respondents must:

- identify the precise statutory authority for detention;
- produce the detainer, warrant, Notice to Appear, custody determination, and any mandatory detention records;
- explain whether custody is under § 1226(a), § 1226(c), § 1225(b), § 1231, or another authority;
- prove that continued detention is lawful and constitutionally adequate;
- show why less restrictive alternatives cannot address any asserted risk;

- explain why payment of state bond did not result in release; and
- permit Ms. Chavez to present evidence of residence, marital relationship, sponsorship, community ties, and ability to support compliance.

113. Petitioner requests that any custody hearing be meaningful, individualized, prompt, and before a neutral decision-maker. The hearing should not be a mere paperwork review or conclusory approval of an ICE hold.

114. Petitioner further requests that Respondents bear the burden of justifying continued detention. A person whose liberty is restrained should not bear the impossible burden of disproving reasons that the Government has not disclosed.

X. REQUEST FOR IMMEDIATE RELEASE

115. Immediate release is warranted because the state bond was paid, the continuing basis for detention appears to be an ICE hold or immigration custody action, and Respondents have not provided a court-tested legal basis for continued confinement.

116. Release may be ordered under reasonable conditions, including appearance obligations, address reporting, compliance with immigration notices, and any other lawful condition the Court deems appropriate.

117. Ms. Chavez is willing to serve as sponsor, provide a stable address, assist with transportation and court appearances, maintain communication with counsel, and support compliance with any conditions of release.

118. Continued detention is not the least restrictive means to secure immigration objectives. Reasonable conditions can address appearance and public safety while respecting the constitutional presumption against unnecessary civil incarceration.

XI. ALTERNATIVE REQUEST FOR ORDER TO SHOW CAUSE AND PROMPT JUDICIAL VERIFICATION

119. If the Court does not grant immediate release upon initial review, it should issue an order to show cause forthwith under 28 U.S.C. § 2243.

120. The order should require Respondents to file a return within three days, or within another expedited period set by the Court, certifying the true cause of detention and attaching the relevant records.

121. The Court should then set a prompt hearing and require production of the detainee unless the issues are purely legal and the Court finds production unnecessary.

122. Petitioner specifically requests that a federal judge verify the legality of the detention. At minimum, Mr. Gonzalez should not remain imprisoned merely because one agency lodged a hold and another agency continues to house him without judicial examination of the underlying authority.

XII. REQUEST FOR NO-TRANSFER PROTECTION

123. Petitioner requests an order prohibiting transfer of Mr. Gonzalez outside the Northern District of Florida while this Petition is pending without at least 72 hours' notice to the Court and Petitioner, unless Respondents demonstrate emergency circumstances.

124. A no-transfer order is appropriate because transfer can frustrate habeas jurisdiction, disrupt access to counsel and family, impair next-friend communication, and prevent effective adjudication of the petition.

125. If Respondents contend transfer is necessary, they should be required to identify the proposed destination, legal authority, reason for transfer, and effect on the Court's jurisdiction before moving the detainee.

XIII. PRAYER FOR RELIEF

WHEREFORE, Petitioner Sandy Ricardo Chavez, as next friend of Daniel Steven Gonzalez, respectfully requests that this Court grant the following relief:

1. Assume jurisdiction over this Petition under 28 U.S.C. § 2241;
2. Recognize Sandy Ricardo Chavez as next friend for purposes of filing this habeas petition under 28 U.S.C. § 2242, or alternatively permit prompt supplementation, ratification, or amendment;
3. Issue the writ of habeas corpus and order the immediate release of Daniel Steven Gonzalez from unlawful custody;
4. Alternatively, issue forthwith an order to show cause under 28 U.S.C. § 2243 requiring Respondents to certify the true cause of detention;
5. Require Respondents to produce all custody records, including any ICE detainer, administrative warrant, Notice to Appear, custody determination, order to detain or release, bond determination, state bond record, and communications between ICE and Walton County Jail;
6. Set an expedited hearing before this Court to determine whether Mr. Gonzalez's continued detention is lawful;
7. Alternatively, order Respondents to provide Mr. Gonzalez with a prompt individualized custody or bond hearing before a neutral decision-maker at which the Government bears the burden of justifying continued detention;
8. Declare that continued detention based solely on an ICE hold, after state bond has been paid and without a valid federal custody basis and adequate process, violates the Due Process Clause of the Fifth Amendment and the federal habeas statutes;
9. Order that Mr. Gonzalez not be transferred outside this District while the Petition is pending without prior notice and leave of Court;
10. Award reasonable costs if permitted by law; and
11. Grant such other and further relief as law and justice require.

XIV. VERIFICATION OF PETITION BY NEXT FRIEND

I, Sandy Ricardo Chavez, declare under penalty of perjury under the laws of the United States of America that I am the spouse of Daniel Steven Gonzalez, that I am filing this Petition as his next friend because he is detained and cannot meaningfully prepare and file this emergency habeas petition on his own, and that the factual statements made in this Petition are true and correct to the best of my personal knowledge, information, and belief. I understand that statements made under penalty of perjury must be truthful.

Executed on: JUNE 30, 2026

Respectfully submitted,

Sandy Ricardo Chávez

SANDY RICARDO CHAVEZ
Colombian Citizenship Identification No. [redacted]

OCHOA HERNÁNDEZ
ABOGADOS & ASOCIADOS

[redacted]
Next Friend of Daniel Steven Gonzalez

CERTIFICATE OF SERVICE

I certify that on JUNE 30 , 2026, a true and correct copy of this Petition and any supporting exhibits was served, or will be served as directed by the Court, on the appropriate Respondents and government counsel, including the United States Attorney's Office for the Northern District of Florida, counsel for the Department of Homeland Security, U.S. Immigration and Customs Enforcement, and the Walton County Jail custodian.

Sandy Ricardo Chávez

SANDY RICARDO CHAVEZ

PROPOSED ORDER

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION

Upon consideration of the Verified Emergency Petition for Writ of Habeas Corpus filed by Sandy Ricardo Chavez as next friend of Daniel Steven Gonzalez, and good cause appearing, it is ORDERED:

1. Respondents shall show cause why the writ should not be granted and why Daniel Steven Gonzalez should not be immediately released from custody.
2. Respondents shall file a return certifying the true cause of detention no later than _____, 2026, and shall attach all documents on which they rely to justify custody, including any immigration detainer, administrative warrant, Notice to Appear, custody determination, order to detain or release, bond determination, and state bond records.
3. A hearing is set for _____, 2026, at _____ _.m., before the United States District Court for the Northern District of Florida, Pensacola Division.
4. Respondents shall ensure that Daniel Steven Gonzalez is available for the hearing in person, by video, or as otherwise ordered by the Court.
5. Respondents shall not transfer Daniel Steven Gonzalez outside this District while this Petition is pending without prior notice to the Court and Petitioner, unless emergency circumstances are shown.
6. The Court reserves ruling on immediate release pending the return and hearing, unless Respondents fail to timely show lawful authority for continued custody.

DONE AND ORDERED this ___ day of _____, 2026.

_____
UNITED STATES DISTRICT JUDGE

ATTACHMENT A: DECLARATION OF SANDY RICARDO CHAVEZ IN SUPPORT OF NEXT-FRIEND STANDING

I, Sandy Ricardo Chavez, declare as follows:

1. My name is Sandy Ricardo Chavez. I am an adult and I reside at [redacted]

2. I am the wife of Daniel Steven Gonzalez. I file the accompanying Petition as his next friend because he is detained and cannot meaningfully prepare, verify, and file an emergency habeas petition on his own.

3. Daniel Steven Gonzalez is presently detained at Walton County Jail, 40 Sheriff Circle, DeFuniak Springs, Florida 32433, according to the information available to me.

4. I understand that he was booked on or about May 26, 2026, and that the booking information includes an ICE hold and state criminal allegations. I do not state that he is guilty of any allegation. I understand these are allegations or booking entries.

5. I understand that a state bond was set for the state criminal charges and that the bond was paid. Despite payment of the state bond, he remains in custody because of ICE-related action or hold.

6. Because he remains detained, his ability to communicate, gather documents, contact counsel, access legal materials, and file a petition in federal court is materially limited.

7. I act in good faith and in Daniel Steven Gonzalez's best interests. I seek his release from unlawful custody, or at minimum a prompt hearing before a judge or neutral decision-maker to determine whether his continued detention is lawful.

8. I am willing to support his release, provide a stable address, assist him in attending court and immigration hearings, help him communicate with counsel, and support compliance with any lawful conditions of release.

9. I have no conflict of interest with Daniel Steven Gonzalez. I do not seek to waive any of his rights, defenses, or claims. I seek only to protect his liberty and ensure access to court.

10. I request that the Court allow me to proceed as next friend, or allow me to supplement this declaration with additional documents if required.

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

Executed on: June 30, 2026

Sandy Ricardo Chávez

SANDY RICARDO CHAVEZ

ATTACHMENT B: INDEX OF EXHIBITS TO BE FILED

The following exhibits are identified for filing with the Petition or for supplementation upon production of the custody file:

1. Proof of marriage or marital relationship between Sandy Ricardo Chavez and Daniel Steven Gonzalez;

2. Identification document of Sandy Ricardo Chavez;

3. Booking record showing Daniel Steven Gonzalez, booking date of May 26, 2026, and ICE hold entry;

4. State bond order or bond receipt showing bond was set and paid;

5. Any ICE detainer, Form I-247, Form I-200, Form I-203, Form I-286, Notice to Appear, or related custody document;

6. Proof of current detention at Walton County Jail;

7. Proof of proposed residence and sponsor support at [redacted]

8. Any evidence of family ties, employment history, community ties, medical issues, or other factors relevant to release conditions.

ATTACHMENT C: PRINCIPAL AUTHORITIES CITED

1. 28 U.S.C. § 2241 - federal habeas jurisdiction and power to grant the writ.
2. 28 U.S.C. § 2242 - habeas application may be signed and verified by the detained person or by someone acting on his behalf.
3. 28 U.S.C. § 2243 - writ or order to show cause, return by custodian, hearing, and disposition as law and justice require.
4. 28 U.S.C. § 1746 - unsworn declarations under penalty of perjury.
5. 8 U.S.C. § 1226 - detention and release pending removal proceedings.
6. 8 C.F.R. § 287.3(d) - custody determination after immigration arrest.
7. 8 C.F.R. § 287.7 - immigration detainer provisions and temporary detention period.
8. Whitmore v. Arkansas, 495 U.S. 149 (1990) - next-friend standing requirements.
9. Rumsfeld v. Padilla, 542 U.S. 426 (2004) - immediate custodian and district-of-confinement principles in habeas.
10. Zadvydas v. Davis, 533 U.S. 678 (2001) - due process concerns with indefinite immigration detention and habeas review.
11. Demore v. Kim, 538 U.S. 510 (2003) - immigration detention during removal proceedings, limits of § 1226(e), and constitutional review.
12. Jennings v. Rodriguez, 583 U.S., 138 S. Ct. 830 (2018) - statutory interpretation of immigration detention provisions and preservation of constitutional questions.
13. Nielsen v. Preap, 586 U.S., 139 S. Ct. 954 (2019) - interpretation of § 1226(c) mandatory detention timing and covered categories.

Respectfully submitted,

Sandy Ricardo Chávez

SANDY RICARDO CHAVEZ
Colombian Citizenship Identification No. [redacted]
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Alford, Florida 32420
Petitioner and Next Friend of Daniel Steven Gonzalez