**UNITED STATES DISTRICT COURT**
**SOUTHERN DISTRICT OF CALIFORNIA**

**VICENTE JAVIER PEREZ-CONCHAMBAY**
**A-Number:** [redacted]
**Petitioner, Pro Se**

v.

WARDEN, OTAY MESA DETENTION CENTER
**Respondent**

Case No.: '26CV4030 AGS MMP

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

JUL 13 2026
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
DEPUTY

I, Vicente Javier Perez-Conchambay, A-Number [redacted] am currently detained at the Otay Mesa Detention Center. I file this Petition for Writ of Habeas Corpus on my own behalf, without an attorney, and proceeding pro se.

I respectfully ask this Court to review the legality and constitutionality of my continued immigration detention. I was detained after voluntarily appearing before ICE in Newark, New Jersey, in compliance with a notice that I received with very little advance notice. Since my detention, I have been transferred far away from my wife and my two stepdaughters, and my support network.

I have not received a meaningful and individualized bond hearing where I can present my personal circumstances and demonstrate that I am not a danger to the community, that I am not a flight risk, and that I am willing to comply with my immigration obligations and any reasonable conditions of supervision.

## I. PERSONAL BACKGROUND AND DETENTION

1. My name is Vicente Javier Perez-Conchambay. My A-Number is [redacted] I am a native and citizen of Ecuador [redacted]

2. I entered the United States on or about November 14, 2022. I have a pending immigration process and I am pursuing asylum and related immigration relief. I have an Employment Authorization Document and a Social Security number.

3. I have no criminal record. I live with my wife and her two daughters, who are my stepdaughters and are eighteen (18) and ten (10) years old. I have lived with my wife for approximately two and a half years, and we have built a home and family together.

4. Before my detention, I contributed to the financial support and stability of our household. My detention has caused financial and emotional hardship for my wife and stepdaughters.

5. I did not have an immigration court hearing scheduled for July 3, 2026. With very little advance notice, I received a notice directing me to appear before ICE in Newark, New Jersey, on July 3, 2026, at approximately 8:00 a.m. I received the notice essentially from one day to the next.

6. Despite the short notice, I voluntarily complied and appeared at the date, time, and place stated in the notice. I did not flee, hide, or attempt to avoid immigration authorities. When I appeared to comply with the notice, ICE officers detained me inside the facility.

7. After my detention, I was separated from my wife and my two stepdaughters and transferred from New Jersey to California. I am now detained at Otay Mesa Detention Center, 7488 Calzada de la Fuente, San Diego, California 92154.

8. My transfer has placed me thousands of miles away from my wife, my stepdaughters, and the people who can help me with my immigration process. The distance has made it more difficult to communicate with my family, obtain documents, gather evidence, and prepare my pending immigration case.

9. I have not received a meaningful and individualized bond hearing. I have not had a meaningful opportunity to demonstrate before a neutral decision-maker that I am not a danger to the community and that I am not a flight risk.

10. I am willing to comply with all reasonable conditions of release. If released, I am willing to report to ICE as required, attend all immigration proceedings, comply with electronic monitoring if required, and obey any other lawful condition of supervision.

## II. JURISDICTION AND VENUE

11. I file this Petition under 28 U.S.C. § 2241 because I am in federal immigration custody and ask this Court to review the legality and constitutionality of my continued physical detention.

12. This Court has jurisdiction under 28 U.S.C. § 2241 and 28 U.S.C. § 1331.

13. I am physically detained within the Southern District of California. Venue is therefore proper in this Court. The Respondent is the Warden of the Otay Mesa Detention Center, my immediate custodian.

## III. DUE PROCESS CLAIM

14. The Fifth Amendment protects every person from being deprived of liberty without due process of law. Immigration detention is civil in nature.

15. I respectfully ask this Court to review whether my continued detention without a meaningful and individualized bond hearing violates due process.

16. My individual circumstances include my lack of criminal history, voluntary appearance before ICE despite very short notice, pending asylum process, employment authorization, family ties, stable residence, community support, and willingness to comply with reasonable conditions of supervision.

17. I am not asking this Court to decide my asylum application or resolve my immigration case. I ask this Court to review my continued physical detention and give me a meaningful opportunity to show that detention is not necessary based on my individual circumstances.

## IV. HARDSHIP CAUSED BY DETENTION AND TRANSFER

18. My wife and two stepdaughters remain in New Jersey, thousands of miles from the place where I am detained. My sudden detention and transfer have affected the financial and emotional stability of my family.

19. The distance makes communication, collection of documents, preparation of evidence, and assistance with my immigration case more difficult.

20. If released, I will return to my family and have a stable place to live. I also have a sponsor and other people willing to support me and help me comply with my immigration obligations.

## V. REQUEST FOR RELIEF

For these reasons, I respectfully ask this Court to: (A) accept jurisdiction over this Petition; (B) order Respondent to explain and legally justify my continued detention; (C) order a prompt, meaningful, and individualized bond hearing before a neutral decision-maker; (D) require consideration of my lack of criminal history, voluntary appearance before ICE, short-notice reporting letter, pending asylum process, employment authorization, wife, two stepdaughters, family ties, stable residence, sponsor support, and alternatives to detention; (E) alternatively, order my release under reasonable conditions of supervision if the Government cannot lawfully justify my continued detention; (F) protect my reasonable ability to communicate with family and supporters, access legal materials, gather evidence, and prepare my immigration case; and (G) grant any other relief the Court considers fair and appropriate.

[redacted]

**VICENTE JAVIER PEREZ-CONCHAMBAY**
A-Number [redacted]
Petitioner, Pro Se
Otay Mesa Detention Center
7488 Calzada de la Fuente
San Diego, CA 92154

Date: 07-11-2026

**VERIFICATION AND DECLARATION UNDER PENALTY OF PERJURY**

I, Vicente Javier Perez-Conchambay, A-Number 246-230-406, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I am the Petitioner in this action, that I have read this Petition for Writ of Habeas Corpus, and that the factual statements contained in it are true and correct to the best of my knowledge.

Executed on:

[redacted]

**VICENTE JAVIER PEREZ-CONCHAMBAY**
A-Number: [redacted]