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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
VALDOSTA DIVISION

BRYAN ALAN MEDINA-ANGEL, Petitioner,	**CASE NO.:**
v.	
CODY YOUGHN, in his official capacity as Sheriff of Irwin County; **LADEON FRANCIS**, in his official capacity as Field Office Director, ICE ERO Atlanta; **DAVID J. VENTURELLA**, in his official capacity as Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement; **MARKWAYNE MULLIN**, in his official capacity as Secretary of the Department of Homeland Security; **TODD BLANCHE**, in his official capacity as Acting Attorney General of the United States,	
Respondents.	

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

Petitioner Bryan Alan Medina-Angel, proceeding pro se, respectfully petitions this Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241 and alleges as follows:

I. INTRODUCTION

1. Petitioner Bryan Alan Medina-Angel has been continuously confined in civil immigration custody since January 28, 2026.
2. At the time of filing, Petitioner has been detained for nearly six months. His detention remains ongoing, and no definite date has been identified by which the administrative proceedings concerning his case will conclude.

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3. This is not Petitioner's first habeas action. On April 3, 2026, through prior counsel, he filed a verified petition in this Court challenging Respondents' contention that he was subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A).
4. On May 13, 2026, this Court determined that Petitioner's custody is governed by 8 U.S.C. § 1226(a), not § 1225(b)(2)(A).
5. The Court ordered Respondents to provide an individualized custody hearing within seven days. It further ordered that DHS bear the burden of establishing, by clear and convincing evidence, that Petitioner was either a danger to the community or a flight risk.
6. A copy of the Court's May 13, 2026 Order is attached as **Exhibit A.**
7. According to Petitioner's personal recollection, the custody hearing ordered by this Court was held on or about May 20, 2026.
8. Petitioner's request for release was denied.
9. Petitioner recalls being informed that the Immigration Judge considered him a flight risk. He does not recall being informed that the Immigration Judge found him to be a danger to the community.
10. Petitioner has not received and does not presently possess a written custody decision, bond memorandum, or other written explanation identifying the particular evidence and findings supporting the denial.
11. Petitioner does not allege that no written decision exists. He states only that no such decision has been provided to him or is presently available to him.
12. Petitioner also does not ask this Court to function as an appellate immigration bond tribunal.
13. He does not ask this Court to set a bond amount, substitute its judgment for the discretionary judgment of the Immigration Judge, or decide that particular evidence should have been given more weight during the prior hearing.
14. Petitioner does not challenge the Immigration Judge's decision concerning his applications for relief from removal, and he does not ask this Court to decide the merits of the administrative appeal pending before the Board of Immigration Appeals.
15. The present Petition challenges only the legality of Petitioner's continuing physical confinement after the custody procedure previously ordered by this Court has already occurred.

16. The constitutional question is whether the continued deprivation of Petitioner's liberty remains reasonably related to a lawful civil purpose under the totality of the circumstances now existing.
17. Those circumstances include nearly six months of continuous detention; the completion of the court-ordered custody proceeding; the continued pendency of administrative review; the absence of any known history of failing to appear; the absence of any dangerousness finding communicated to Petitioner; and the availability of a fixed, verified family residence to which he can return immediately.
18. Petitioner's supporting evidence is not submitted so that this Court may conduct a new bond-weighing exercise.
19. The evidence is submitted to establish the factual circumstances of the continuing detention, to demonstrate that the relief requested is concrete and capable of immediate implementation, and to show that release would not terminate or obstruct the immigration proceedings.
20. Petitioner asks the Court to grant the writ and order his prompt release from civil immigration detention.
21. Petitioner requests another custody proceeding only as alternative relief if the Court concludes that direct release is unavailable on the present record.

II. JURISDICTION

22. This Court has habeas corpus jurisdiction pursuant to 28 U.S.C. § 2241(c)(3) because Petitioner is in custody under authority of the United States and alleges that his continuing detention violates the Constitution and laws of the United States.
23. This action also arises under the Fifth Amendment to the United States Constitution and the federal statutes governing civil immigration detention. See 28 U.S.C. § 1331.
24. Under 28 U.S.C. § 2243, a habeas court must hear and determine the facts and dispose of the matter "as law and justice require."
25. The traditional function of habeas corpus is to test the legality of physical custody and to secure release when that custody is unlawful. *Dep't of Homeland Security v. Thuraissigiam*, 591 U.S. 103, 117 (2020); *Munaf v. Geren*, 553 U.S. 674, 693–94 (2008).

26. Petitioner is physically confined at the Irwin County Detention Center in Ocilla, Georgia, within the Middle District of Georgia.

27. His immediate physical custodian is located within this District.

A. This Petition does not challenge a removal order

28. Petitioner does not ask this Court to determine whether he is removable from the United States.

29. He does not ask the Court to grant asylum, withholding of removal, adjustment of status, or any other immigration benefit.

30. He does not ask the Court to overturn the Immigration Judge's merits ruling or to decide the appeal pending before the Board of Immigration Appeals.

31. A decision ordering Petitioner's release would not terminate the removal proceedings, confer immigration status, or prevent the responsible immigration authorities from continuing those proceedings.

32. If released, Petitioner would remain subject to all lawful appearance, reporting, address-update, and administrative requirements applicable to him.

33. The Supreme Court has recognized that a challenge to detention is not necessarily a challenge to the removal proceedings themselves. See *Jennings v. Rodriguez*, 583 U.S. 281, 292–95 (2018).

B. Section 1226(e) does not eliminate review of constitutional questions

34. Petitioner acknowledges that 8 U.S.C. § 1226(e) limits judicial review of discretionary custody judgments made under § 1226.

35. For that reason, Petitioner does not ask this Court to reassess whether individual facts presented at the custody hearing established or disproved flight risk.

36. Petitioner does not ask the Court to determine whether the Immigration Judge assigned the correct weight to his residence, marriage, parenthood, employment, pending appeal, community connections, or other traditional custody considerations.

37. Petitioner instead raises an as-applied constitutional challenge to the legality of his continuing detention after the procedure ordered in the prior federal action has already occurred.

38. Section 1226(e) does not bar constitutional claims or questions of law concerning the statutory framework authorizing detention. *Jennings*, 583 U.S. at 295–96.

39. The distinction is significant A request for this Court to reconsider the Immigration Judge's weighing of individual bond factors would constitute prohibited review of a discretionary judgment.

40 A claim that continuing physical confinement has become constitutionally excessive or insufficiently related to a lawful civil purpose challenges the legality of custody itself.

III. VENUE

41 Venue is proper in the Middle District of Georgia, Valdosta Division, because Petitioner remains confined at the Irwin County Detention Center in Ocilla, Georgia.

42. Petitioner's immediate custodian is located within this District.

43. This Court also presided over Petitioner's prior habeas action concerning the statutory authority governing the same continuous detention.

IV. PARTIES

44. Petitioner Bryan Alan Medina-Angel, A-Number A[redacted] is a civil immigration detainee presently confined at:

Irwin County Detention Center

132 Cotton Drive

Ocilla, Georgia 31774.

45. Petitioner proceeds pro se and seeks only prospective habeas and equitable relief. He does not seek monetary damages.

46. Respondent Cody Youghn is the Sheriff of Irwin County and Petitioner's immediate physical custodian. He is sued only in his official capacity.

47. Respondent LaDeon Francis is the Field Office Director for U.S. Immigration and Customs Enforcement, Enforcement and Removal Operations, Atlanta Field Office. He exercises official authority concerning immigration detention within the relevant field-office area and is sued only in his official capacity.

48. Respondent David J. Venturella is the Senior Official Performing the Duties of the Director of U.S. Immigration and Customs Enforcement. He is sued only in his official capacity.

49. Respondent Markwayne Mullin is the Secretary of the Department of Homeland Security. He is sued only in his official capacity.

50. Respondent Todd Blanche is the Acting Attorney General of the United States. He is sued only in his official capacity.

51. Petitioner recognizes that the immediate custodian is the principal respondent to the habeas claim. The federal officials are named in their official capacities to permit effective prospective relief concerning the custody implemented by their respective agencies.

V. FACTUAL AND PROCEDURAL HISTORY

A. Entry, parole, and removal proceedings

52. Petitioner arrived near Eagle Pass, Texas, on August 19, 2022.

53. The immigration records include an Interim Notice Authorizing Parole dated October 19, 2022.

54. Petitioner does not treat those two dates as interchangeable. August 19, 2022 is the date associated with his arrival or initial immigration processing, while October 19, 2022 is the date appearing on the parole document.

55. The parole documentation and related immigration records are attached as **Exhibit M.**

56. DHS placed Petitioner in removal proceedings under section 240 of the Immigration and Nationality Act.

57. Petitioner later established his home in Charlotte, North Carolina, with his wife and child.

B. Appearance before the Charlotte Immigration Court

58. On July 9, 2025, the Charlotte Immigration Court issued written notice requiring Petitioner to appear for a Master Calendar Hearing on January 20, 2026.

59. Petitioner appeared as directed on January 20, 2026.

60. Following that appearance, the Immigration Court issued written notice scheduling Petitioner's Individual Hearing for February 29, 2028.

61. The notice reflected the Charlotte address known to the Immigration Court.

62. A copy of the hearing notice is attached as **Exhibit D.**

63. Petitioner had not failed to attend that hearing.

64. He had not abandoned the address known to the Immigration Court.

65. He had not concealed his residence or location from immigration authorities.

C. Arrest on January 28, 2026

66. On January 28, 2026, eight days after his appearance before the Charlotte Immigration Court, ICE officers arrested Petitioner in a Walmart parking area in Charlotte, North Carolina.
67. Petitioner was seated in his vehicle and was working as a delivery driver when he was encountered and arrested.
68. Petitioner was not arrested while attempting to cross a border.
69. He was not arrested while attempting to leave the jurisdiction, evade a scheduled hearing, or conceal himself from immigration authorities.
70. He was engaged in ordinary work in the community where he lived with his family.
71. Petitioner was initially taken into immigration custody and was later transferred to the Irwin County Detention Center in Ocilla, Georgia.
72. He has remained continuously confined since January 28, 2026.

D. Scheduling after detention

73. After Petitioner's detention and transfer to Georgia, the scheduling reflected in EOIR's automated system changed.
74. As of April 3, 2026, the automated system reflected a Master Calendar Hearing scheduled for April 23, 2026, before Immigration Judge Andrew Hewitt.
75. Petitioner does not allege, without documentary support, why the scheduling changed.
76. He includes this history only to explain that the February 2028 notice existed before his arrest and that the subsequent detained proceedings followed a different schedule after he was taken into custody.

E. Prior federal habeas proceeding

77. On April 3, 2026, Petitioner, through prior counsel, filed a Verified Petition for Writ of Habeas Corpus and Complaint for Declaratory and Injunctive Relief in this Court.
78. The prior case was docketed as *B.A.M.A. v. Warden, Irwin County Detention Center*, Case No. 7:26-cv-00095-WLS-ALS.
79. The prior petition challenged, among other matters, Respondents' contention that Petitioner was subject to mandatory detention under 8 U.S.C. § 1225(b)(2)(A).
80. On May 13, 2026, this Court held that § 1225(b)(2)(A) did not govern Petitioner's interior detention.

81. The Court concluded that Petitioner was an "applicant for admission" but was not "seeking admission" when ICE arrested him while he was sitting in his vehicle in Charlotte.
82. The Court determined that Petitioner's custody is governed by 8 U.S.C. § 1226(a).
83. The Court ordered Respondents to provide Petitioner with a bond hearing under § 1226(a)(2) within seven days.
84. The Court ordered that the hearing comply with due process, including the requirement that DHS bear the burden of proving by clear and convincing evidence that Petitioner was either a danger to the community or a flight risk.
85. The Court further stated that once the bond hearing was provided, Petitioner would have received the remedy that the Court was then authorized to order, and Petitioner should file a notice of dismissal.
86. Petitioner acknowledges that language and does not contend that the prior Court failed to provide the relief it considered proper in the controversy then before it.
87. The present Petition concerns the detention and circumstances that continued after entry of the May 13 Order and after the custody hearing was held.

F. Administrative appeal

88. Following an adverse decision in his removal proceedings, Petitioner pursued administrative review before the Board of Immigration Appeals.
89. The Board received Petitioner's appeal on May 18, 2026.
90. The BIA issued a filing receipt dated May 19, 2026.
91. The filing receipt is attached as **Exhibit C**.
92. Petitioner relies on the dates appearing on that receipt and does not attempt to characterize any undocumented or uncertain portion of the sequence leading to the BIA filing.
93. According to the records presently available to Petitioner, the administrative appeal remains pending.
94. Petitioner does not contend that the filing of the appeal guarantees a favorable result.
95. The receipt is offered to establish that Petitioner continued pursuing the legal process rather than abandoning it.

G. The court-ordered custody hearing

96. According to Petitioner's personal recollection, the custody hearing ordered by this Court was held on or about May 20, 2026.

97. Petitioner's request for release was denied.

98. Petitioner recalls being informed that the Immigration Judge considered him a flight risk.

99. He does not recall being informed that he was found to be a danger to the community.

100. Petitioner has not received and does not presently possess a written custody decision, bond memorandum, or other written explanation identifying the evidence, findings, or reasoning supporting the denial.

101. Petitioner does not allege, without documentation, that the Immigration Judge ignored particular evidence, applied an incorrect burden, or failed to prepare a written record.

102. He states only what he personally recalls and what documentation is presently available to him.

103. Petitioner's sworn declaration concerning the custody hearing and his continued confinement is attached as **Exhibit B**.

104. Petitioner has remained continuously detained since that hearing.

VI. PETITIONER'S PRESENT CIRCUMSTANCES

A. Duration of detention

105. Petitioner has been continuously detained since January 28, 2026.

106. As of the filing of this Petition, he has been detained for nearly six months.

107. Petitioner does not contend that the passage of nearly six months, standing alone, automatically establishes a constitutional violation.

108. The duration is relevant as part of the totality of the circumstances, including the fact that the custody process ordered by this Court has already occurred, the administrative appeal remains unresolved, and the detention continues without an identified end date.

109. Each additional day of detention represents a continuing deprivation of physical liberty.

B. Appearance history

110. Petitioner is not aware of ever failing to appear for a scheduled immigration court hearing.

111. He appeared for the January 20, 2026 proceeding before the Charlotte Immigration Court.

112. Following that appearance, he received the notice scheduling the Individual Hearing for February 29, 2028.

113. ICE arrested him eight days later while he was working openly in Charlotte.

114. After an adverse decision in the detained removal proceedings, Petitioner pursued review before the BIA.

115. These facts are not submitted so that this Court may independently decide the question of flight risk.

116. They provide factual context for the continuing detention and demonstrate that Petitioner's release would not terminate his participation in the immigration process.

C. Family and residence

117. Before his detention, Petitioner resided with his wife, Claudia Suyapa Gonzalez Serna, and their young son at:

[redacted]

118. Claudia is a United States citizen.

119. Petitioner and Claudia were married on December 27, 2024.

120. The certified marriage record is attached as **Exhibit G.**

121. Their son, D[redacted] is a United States citizen.

122. D[redacted] certified birth certificate identifies Petitioner as his father and is attached as **Exhibit H.**

123. Claudia has provided a sworn declaration explaining the family relationship, Petitioner's role in the household, the effects of his detention, and the support she will provide if he is released.

124. Claudia's declaration is attached as **Exhibit E.**

125. The family residence remains available to Petitioner.

126. Selected records corroborating the family's residence are attached as **Exhibit K.**

127. Petitioner therefore has a specific, stable, and verifiable address to which he can return immediately upon release.

D. Pending family petition

128. Claudia filed a Form I-130 petition on Petitioner's behalf.

129. The receipt notice is attached as **Exhibit L.**

130. Petitioner does not contend that the petition will necessarily be approved.

131. He does not contend that the pending petition presently confers immigration status or guarantees eligibility for adjustment of status.

132. The receipt is submitted only as evidence of the documented marital relationship and an additional immigration process that Petitioner and his wife are pursuing through lawful channels.

E. Employment and taxes

133. Before detention, Petitioner worked in Charlotte, including as a delivery driver.

134. Selected employment, tax, and work-authorization documents are attached as **Exhibit N.**

135. Those records corroborate that Petitioner lived and worked openly in the Charlotte community.

136. The documents are not offered to establish any immigration benefit beyond what appears on their face.

F. Supporting declarations and photographs

137. Relatives, friends, former coworkers, and members of the community have provided statements based upon their personal experiences with Petitioner.

138. Those statements describe Petitioner's work habits, reliability, family involvement, participation in community activities, and the support available to him after release.

139. The declarations and letters are collected in **Exhibit J.**

140. Selected family and community photographs are attached as **Exhibit O.**

141. The photographs are offered as limited corroboration of the family and community relationships described in the sworn statements and civil records.

142. They are not presented as independent proof that Petitioner is legally entitled to release.

G. Mecklenburg County record search

143. Petitioner is not aware of any criminal conviction.

144. A certified criminal and infraction record search limited to Mecklenburg County, North Carolina, located no defendant records under Petitioner's name and date of birth.

145. The certified search is attached as **Exhibit I.**

146. Petitioner does not characterize that search as a national criminal-history search or as proof concerning every jurisdiction.

H. Post-release support

147. Petitioner has submitted a written post-release family support and compliance plan, attached as **Exhibit F**.

148. The plan identifies the residence to which Petitioner will return, transportation arrangements, access to telephone and mail, and practical assistance with hearings, appointments, correspondence, and deadlines.

149. The plan is not offered as an admission that Petitioner requires electronic monitoring, an unaffordable monetary bond, intensive supervision, or another extraordinary restriction.

150. It demonstrates that the requested release is capable of immediate and orderly implementation.

151. Upon release, Petitioner will comply with all lawful appearance and reporting obligations applicable to him.

VII. LEGAL FRAMEWORK

A. Civil immigration detention remains subject to the Fifth Amendment

152. The Due Process Clause of the Fifth Amendment protects every "person" within the United States from deprivation of liberty without due process of law. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001); *Mathews v. Diaz*, 426 U.S. 67, 77 (1976).

153. Immigration detention is civil rather than criminal.

154. Its constitutionally permissible purposes are regulatory, not punitive. *Zadvydas*, 533 U.S. at 690; *Demore v. Kim*, 538 U.S. 510, 527–28 (2003).

155. A civil detention measure must remain reasonably related to the nonpunitive purpose asserted to justify it. *Zadvydas*, 533 U.S. at 690.

156. The Government has legitimate interests in assuring appearances and protecting the community where an individualized basis for such concerns exists.

157. Those interests do not make every period of civil confinement automatically constitutional, nor do they eliminate the requirement that continued custody remain connected to a lawful regulatory need.

B. Section 1226(a) governs Petitioner's detention

158. Section 1226(a) permits the arrest and detention of a noncitizen pending a decision on whether the person is to be removed.

159. Unlike the mandatory detention provisions applicable in other circumstances, § 1226(a) also expressly authorizes release on bond or conditional parole.

160. This Court has already conclusively determined, for purposes of Petitioner's custody, that § 1226(a) governs his detention.

161. The present Petition does not seek to relitigate that holding.

162. The issue is whether continued incarceration under that discretionary civil authority remains constitutionally permissible under the circumstances now presented.

C. The Court may review the legality of continuing custody

163. Petitioner recognizes that § 1226(e) protects discretionary judgments concerning the application of § 1226 from ordinary appellate reweighing.

164. Petitioner therefore does not ask this Court to independently decide the same individual bond question decided by the Immigration Judge.

165. The Petition instead challenges the continuing deprivation of liberty as a constitutional matter.

166. A habeas court retains authority to consider constitutional claims and questions of law concerning the legal authority and framework under which a person remains confined. See *Jennings*, 583 U.S. at 295–96.

167. The relief requested—release from allegedly unconstitutional physical custody—falls within the traditional office of habeas corpus.

VIII. GROUND FOR RELIEF

PETITIONER'S CONTINUING CIVIL DETENTION VIOLATES THE DUE PROCESS CLAUSE UNDER THE TOTALITY OF THE PRESENT CIRCUMSTANCES

A. This claim is distinct from the statutory claim resolved in the prior action

168. The prior federal action presented the question whether Respondents could detain Petitioner under § 1225(b)(2)(A) without providing access to a custody determination under § 1226(a).

169. This Court answered that question and ordered a custody hearing.

170. The hearing was subsequently held.

171. Petitioner does not contend that the May 13 Order was erroneous or inadequate when entered.

172. The present Petition concerns the period of detention and circumstances that continued after that Order and after the custody hearing occurred.

173. The present injury is Petitioner's ongoing physical confinement under circumstances that have continued to develop with the passage of time.

B. Petitioner does not seek review of the Immigration Judge's discretionary weighing

174. Petitioner does not ask this Court to decide that the Immigration Judge should have assigned greater weight to his marriage, child, residence, employment, community relationships, or pending appeal.

175. Petitioner does not ask this Court to set a bond amount.

176. Petitioner does not ask the Court to review the custody-hearing record and independently decide whether DHS carried its evidentiary burden.

177. Petitioner also does not allege, without a written record, that the Immigration Judge ignored evidence or deliberately disobeyed this Court's Order.

178. Those would be challenges to the individualized custody determination.

179. Petitioner instead asks whether continuing incarceration, considered as a present and ongoing deprivation of liberty, remains constitutionally connected to a lawful civil objective.

C. Duration is relevant but is not the sole basis of the claim

180. Petitioner has been confined continuously since January 28, 2026.

181. His detention has now lasted nearly six months.

182. Petitioner does not ask the Court to establish a categorical rule that every detention of this duration is unconstitutional.

183. He asks the Court to consider the duration together with the completed custody process, the unresolved administrative appeal, his documented appearance history, the nature of the concern communicated to him, and the concrete availability of release to a verified residence.

184. The constitutional concern arises from the cumulative circumstances, not from a calendar calculation alone.

D. The lack of an available written explanation is a relevant circumstance, not an independent claim

185. Petitioner does not contend that the absence of a written decision in his possession automatically requires release.

186. He does not contend that no written record exists.

187. He states only that he has not received and does not presently possess a document identifying the particular evidence and findings supporting continued detention.

188. Because no written explanation is presently available to him, Petitioner does not know the precise grounds upon which the Immigration Judge concluded that continued confinement was warranted.

189. Petitioner does not speculate that particular evidence was ignored.

190. The lack of an available explanation is relevant because Petitioner remains confined after the court-ordered proceeding while lacking a written account of the basis for that continuing deprivation.

E. The immigration proceedings can continue outside detention

191. Release would not terminate the removal proceedings.

192. It would not resolve the BIA appeal or confer immigration status.

193. Petitioner would remain subject to the jurisdiction of DHS, EOIR, and the BIA.

194. He would remain required to attend proceedings, maintain current contact information, respond to lawful notices, and comply with applicable reporting obligations.

195. Petitioner has an established family address to which he can return.

196. His wife has confirmed the availability of housing and practical support.

197. The requested relief is therefore concrete and capable of immediate implementation.

198. The exhibits establish the practical feasibility of release; they are not offered as an invitation for the Court to conduct an independent bond redetermination.

F. Continued detention imposes a substantial and increasing deprivation

199. Physical incarceration is among the most serious restraints the Government can impose upon a person.

200. Petitioner's confinement separates him from his wife and young child and prevents him from participating in ordinary family and community life.

201. Those hardships do not independently establish a constitutional violation.

202. They demonstrate the practical severity of the liberty deprivation that must remain justified by a legitimate and sufficiently related civil purpose.

203. The longer detention continues, the more substantial that deprivation becomes.

204. The administrative appeal remains unresolved, and the record presently available to Petitioner identifies no definite date on which his custody or appeal must conclude.

G. The cumulative circumstances warrant habeas relief

205. Petitioner relies upon the combined circumstances presently before the Court:

a. his continuous civil confinement since January 28, 2026;

b. this Court's prior determination that his custody is discretionary under § 1226(a);

c. completion of the custody hearing ordered by the Court;

d. nearly six months of continuing detention;

e. an administrative appeal that remains pending;

f. no known history of failing to appear for a scheduled immigration hearing;

g. his appearance on January 20, 2026, followed by his arrest eight days later while working openly in Charlotte;

h. no dangerousness finding communicated to him;

i. the absence of a written custody explanation presently available to him;

j. a certified Mecklenburg County search that located no defendant records under his name and date of birth;

k. a fixed and verified family residence;

l. a United States-citizen wife and child;

m. documented family and community support; and

n. an immediate and workable post-release support plan.

206. No single circumstance is presented as dispositive.

207. Taken together, however, the circumstances demonstrate that Petitioner's continuing incarceration has become excessive in relation to the civil purpose asserted to justify it.

208. The detention therefore violates the Due Process Clause of the Fifth Amendment.

IX. IMMEDIATE RELEASE IS THE APPROPRIATE HABEAS REMEDY

209. The primary relief Petitioner requests is release from the physical custody challenged in this action.

210. Petitioner does not principally seek another bond hearing.

211. The first habeas action resulted in the custody procedure this Court considered appropriate based on the controversy then presented.

212. That procedure has now occurred.

213. The present Petition challenges the detention that continued after the hearing and that remains ongoing.

214. Ordering Petitioner's release would provide complete relief from the allegedly unconstitutional custody without deciding the merits of the removal proceedings.

215. Petitioner would return to the established family residence in Charlotte.

216. He would remain subject to all lawful immigration obligations.

217. Petitioner does not ask the Court to require electronic monitoring, impose an unaffordable monetary bond, or prescribe a particular intensive supervision program.

218. He respectfully asks the Court to order his release from civil immigration detention.

219. If a brief administrative period is required to arrange release and transportation, Petitioner requests that the period be no longer than reasonably necessary to carry out the Court's order.

220. Only if the Court concludes that immediate release cannot be ordered on the present record does Petitioner request alternative constitutionally sufficient relief.

221. Any alternative custody proceeding should be prompt and should preserve the clear-and-convincing burden previously imposed upon DHS.

222. Petitioner should receive reasonable access to the evidence relied upon to justify continued custody.

223. Petitioner should be permitted to present relevant evidence and proposed alternatives to detention.

224. Any alternative decision should include individualized written findings sufficient to explain the basis for continued confinement and why available release arrangements would be inadequate.

225. The alternative request is subordinate to the principal request for immediate release.

X. PRAYER FOR RELIEF

WHEREFORE, Petitioner Bryan Alan Medina-Angel respectfully requests that this Court:

226. Accept jurisdiction over this Verified Petition pursuant to 28 U.S.C. § 2241;

227. Direct Respondents to show cause promptly why the writ should not be granted;

228. Review this Petition on an expedited basis because Petitioner remains continuously deprived of physical liberty;

229. Grant the Petition for Writ of Habeas Corpus;

230. Order Respondents to release Petitioner promptly from civil immigration detention;

231. Allow only the brief administrative period reasonably necessary to effectuate release and arrange transportation;

232. Direct Respondents to file prompt notice confirming compliance with the Court's release order;

233. Preserve the Court's jurisdiction while this Petition is pending and require prompt notice of any non-emergency transfer of Petitioner outside the Middle District of Georgia;

234. Only if the Court declines to order release on the present record, order prompt alternative relief that satisfies the requirements of due process, including DHS's clear-and-convincing burden and individualized written findings; and

235. Grant such other and further relief as law and justice require pursuant to 28 U.S.C. § 2243.

XI. VERIFICATION

I, Bryan Alan Medina-Angel, declare under penalty of perjury under the laws of the United States of America that I am the Petitioner in this action; that I have read this Verified Petition for Writ of Habeas Corpus, or that it has been read and explained to me in a language I understand; that the factual statements based upon my personal knowledge are true and correct; and that, as to matters derived from records or information provided to me, I believe them to be true and correct.

Executed on July 17, 2026, in Ocilla, Georgia.

BRYAN ALAN MEDINA ANGEL
Petitioner, Pro Se



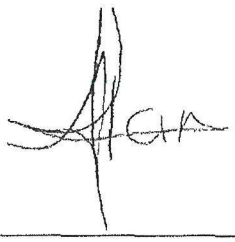
XII. CERTIFICATE OF SERVICE

I, Bryan Alan Medina-Angel, certify that on July 17, 2026, I caused the original of the foregoing Verified Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241, together with its supporting exhibits, to be sent for filing with the Court by UPS, with tracking. I further certify that on the same date, I caused true and correct copies of the Petition and supporting exhibits to be sent by UPS, with tracking, to the remaining recipients listed below.

ORIGINAL — CLERK OF COURT Clerk of Court United States District Court Middle District of Georgia Valdosta Division 401 North Patterson Street Valdosta, Georgia 31601	**1. IMMEDIATE CUSTODIAN** Cody Youghn, Sheriff Irwin County Sheriff's Office 400 South Irwin Avenue Ocilla, Georgia 31774
2. UNITED STATES ATTORNEY Civil-Process Clerk Office of the United States Attorney Middle District of Georgia Gateway Plaza 300 Mulberry Street, 4th Floor Macon, Georgia 31201	**3. ATTORNEY GENERAL** Attorney General of the United States U.S. Department of Justice 950 Pennsylvania Avenue, NW Washington, DC 20530-0001

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

Executed on July 17, 2026, in Ocilla, Georgia.



BRYAN ALAN MEDINA-ANGEL
Petitioner, Pro Se
Irwin County Detention Center
132 Cotton Drive
Ocilla, Georgia 31774
A-Number: A[redacted]