IN THE UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF GEORGIA · COLUMBUS DIVISION

28 U.S.C. § 2241

Case No. _____

ALEXANDER JOSE TORRES CARDENAS, *Petitioner,* **v.** **FACILITY WARDEN,** Stewart Detention Center; **MARKWAYNE MULLIN,** Secretary, U.S. Department of Homeland Security; **TODD BLANCHE,** U.S. Attorney General; **ACTING DIRECTOR,** U.S. Immigration and Customs Enforcement; and **FIELD OFFICE DIRECTOR,** Director, Atlanta Field Office, Enforcement and Removal Operations, *Respondents*	**PETITION FOR WRIT OF HABEAS CORPUS** *Pursuant to 28 U.S.C. § 2241* **AND EMERGENCY REQUEST FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION** **A-Number:** [redacted] Stewart Detention Center 146 CCA Road Lumpkin, GA 31815 **EMERGENCY**

SUBMITTED PRO SE BY: ALEXANDER JOSE TORRES CARDENAS — PETITIONER, APPEARING *PRO SE* | A-NUMBER [redacted]
STEWART DETENTION CENTER · 146 CCA ROAD · LUMPKIN, GA 31815

IN THE UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF GEORGIA · COLUMBUS DIVISION *28 U.S.C. § 2241*

PRELIMINARY STATEMENT

Alexander Jose Torres Cardenas is a native and citizen of Venezuela who presented himself for inspection at the Calexico West Land Port of Entry on December 2, 2024, pursuant to a scheduled CBP One appointment, and was paroled into the United States pursuant to INA § 212(d)(5)(A), 8 U.S.C. § 1182(d)(5)(A). His Form I-94 Arrival/Departure Record confirms his lawful parole. The government itself made the affirmative decision to admit him through this orderly, government-designed process and to release him into the community. For more than fourteen months thereafter, he honored every condition that release placed upon him.

Throughout that period, Petitioner pursued protection through precisely the lawful channels Congress created. His Form I-589 Application for Asylum and for Withholding of Removal is pending before the Executive Office for Immigration Review, having been timely filed within the one-year statutory deadline of 8 U.S.C. § 1158(a)(2)(B). USCIS thereafter granted him an Employment Authorization Document under Category C08 — the category expressly reserved for applicants with pending asylum claims — confirming both the pendency of his claim and the government's own recognition of his lawful presence pending adjudication. He established residence at [redacted] Raleigh, North Carolina, the address reflected on his Notice to Appear, and appeared at every scheduled proceeding. He is a person with every incentive to appear and no history of failing to do so.

On July 2, 2026, following a June 2, 2026 arrest by local police in Wake County, North Carolina — charges that the Wake County District Attorney has since dismissed in full for insufficient evidence — Petitioner was transferred into the custody of U.S. Immigration and Customs Enforcement, where he remains detained at the Stewart Detention Center. To date, no neutral adjudicator has conducted any hearing, and no individualized determination has been made that his confinement serves any legitimate purpose. He has not been afforded a bond hearing of any kind.

This Petition respectfully asks the Court to do something narrow and time-honored: to ensure that a person held by the government is not detained without the most basic process the Constitution guarantees. Petitioner seeks, under 28 U.S.C. § 2241, an order directing his release or, in the alternative, a prompt and individualized bond hearing before a neutral Immigration Judge at which the government bears the burden of establishing, by **clear and convincing evidence**, that he presents a danger to the community or a risk of flight. He also requests a limited order preserving the status quo, so that the Court's jurisdiction is not defeated before it can rule. The relief sought is modest and procedural: the opportunity to be heard.

I. PARTIES

1. **Petitioner Alexander Jose Torres Cardenas** is a native and citizen of Venezuela, born [redacted], in Barquisimeto, Estado Lara, Venezuela. His Alien Registration Number is

[redacted]. He is presently detained at the Stewart Detention Center, 146 CCA Road, Lumpkin, Georgia 31815.

2. Petitioner brings this Petition *pro se*. He is detained and proceeds without the assistance of counsel, and his filings are therefore entitled to liberal construction. *Haines v. Kerner*, 404 U.S. 519, 520 (1972) (per curiam).

3. Respondent **Facility Warden** of the Stewart Detention Center is Petitioner's immediate physical custodian and the proper primary respondent in this action. *Rumsfeld v. Padilla*, 542 U.S. 426, 435 (2004).

4. Respondent **Markwayne Mullin**, Secretary of the U.S. Department of Homeland Security, is named in his official capacity as the head of the agency exercising legal custody over Petitioner.

5. Respondent **Todd Blanche**, U.S. Attorney General, is named in his official capacity in accordance with standard practice in immigration habeas proceedings.

6. Respondent **Acting Director, U.S. Immigration and Customs Enforcement**, is named in his official capacity as the head of the component agency responsible for Petitioner's detention.

7. Respondent **Field Office Director**, Director of the Atlanta Field Office, Enforcement and Removal Operations, exercises supervisory authority over custody decisions affecting Petitioner at the Stewart Detention Center.

II. JURISDICTION AND VENUE

8. This Court has subject-matter jurisdiction under 28 U.S.C. § 2241(c)(3), which authorizes the writ of habeas corpus for a person held "in custody in violation of the Constitution or laws or treaties of the United States." The Supreme Court has long confirmed that § 2241 is the proper vehicle for challenging the lawfulness of immigration detention. *INS v. St. Cyr*, 533 U.S. 289, 305 (2001); *Zadvydas v. Davis*, 533 U.S. 678, 687-88 (2001).

9. The availability of habeas review in these circumstances is reinforced by the constitutional guarantee that the privilege of the writ may not be suspended. *Boumediene v. Bush*, 553 U.S. 723, 745 (2008). This Petition does not challenge a final order of removal; it challenges the lawfulness of Petitioner's detention. Accordingly, the jurisdiction-channeling provisions of 8 U.S.C. § 1252 are not implicated.

10. 8 U.S.C. § 1226(e) does not deprive this Court of jurisdiction. By its terms, that provision insulates only the Executive's *discretionary* judgments from review; it does not bar a court from deciding whether detention comports with the Constitution. *See Jennings v. Rodriguez*, 583 U.S. 281, 293-95 (2018); *Demore v. Kim*, 538 U.S. 510, 516-17 (2003).

10.a This Court is the only forum in which Petitioner can obtain relief. If Respondents treat Petitioner as an "arriving alien" subject to detention under 8 U.S.C. § 1225, then an Immigration Judge has no jurisdiction to conduct a bond hearing or to consider his release 8 C.F.R. § 1003.19(h)(2)(i)(B) In that event, no administrative custody remedy exists, and habeas review under § 2241 is the sole avenue available to test the constitutionality of his confinement. If, on the other hand, Petitioner is properly detained under 8 U.S.C. § 1226(a), then he is entitled to an individualized bond hearing that he has not received. Under either characterization, judicial intervention is necessary, and this Petition is neither premature nor subject to any unexhausted remedy

11. Venue is proper in this District under 28 U.S.C. § 2241(d) because Petitioner is physically confined at the Stewart Detention Center in Lumpkin, Stewart County, Georgia, which lies within the Columbus Division of the Middle District of Georgia, and his immediate custodian is located here. *Rumsfeld v. Padilla*, 542 U.S. at 442-43.

III. STATEMENT OF FACTS

A. Petitioner's Apprehension, Detention, and Release on Parole Under INA § 212(d)(5)(A)

12. On **December 2, 2024**, Petitioner presented himself for inspection at the Calexico West Land Port of Entry in Calexico, California, pursuant to a scheduled appointment through U.S. Customs and Border Protection's CBP One application, and was thereafter **paroled into the United States** pursuant to INA § 212(d)(5)(A), 8 U.S.C. § 1182(d)(5)(A). His Form I-94 Arrival/Departure Record (Admission No. [redacted]) confirms his admission on parole, and the Department's own Notice to Appear (Event No. [redacted], File No. [redacted]), issued the same day at Calexico, California, documents his lawful inspection, processing, and release.

13. Petitioner's release was the product of an affirmative governmental determination. After he was inspected and processed at a Land Port of Entry pursuant to an appointment scheduled through a government-designed and government-administered application, the Department exercised its authority to parole him into the United States and to release him into the community. He proceeded to his declared destination in North Carolina, established a residence there, and complied with every condition of his release.

B. More Than Fourteen Months of Compliance and Established Community Presence

14. On **December 2, 2024**, following his release, Petitioner proceeded to his declared address in Raleigh, North Carolina, and remained continuously subject to the jurisdiction of the Executive Office for Immigration Review. He has remained in compliance with every condition of his parole and with every EOIR requirement continuously since December 2024.

15. Petitioner appeared at every immigration proceeding scheduled for him and met every reporting obligation imposed upon him. There is no allegation — and no fact in this record —

that he ever absconded, failed to report, missed a hearing, or violated any condition of his release during the more than fourteen months he was at liberty.

16. During that period, Petitioner built a documented presence in Raleigh, North Carolina. The Department itself issued him an Employment Authorization Document under Category C08 — the classification reserved by regulation for applicants with a pending asylum application, see 8 C.F.R. § 274a.12(c)(8) — confirming both the pendency of his I-589 and the government's own recognition of his lawful presence pending adjudication. His declared residence at [redacted] Raleigh, North Carolina 27604, is the address reflected on his Notice to Appear and the address at which he received all subsequent immigration notices. These are the hallmarks of a person with established community presence and a powerful incentive to appear — not of a flight risk.

C. Petitioner's Pending Pursuit of Protection Before the Immigration Court

17. Petitioner filed a **Form I-589 Application for Asylum and for Withholding of Removal** with the Executive Office for Immigration Review, within the one-year statutory deadline of 8 U.S.C. § 1158(a)(2)(B). His application remains pending before the Immigration Court. In parallel, USCIS granted him an Employment Authorization Document under Category C08 — the classification exclusively reserved for applicants with a pending asylum application thereby corroborating the pendency of his claim and confirming his authorized presence in the United States while his asylum application is adjudicated.

18. Petitioner is now also in **removal proceedings** before the New York City Immigration Court, 26 Federal Plaza, 12th Floor, Room 1237, New York, New York 10278, where he intends to pursue asylum, withholding of removal, and protection under the Convention Against Torture. According to EOIR's automated case information, his next hearing is a master calendar hearing scheduled for **March 31, 2027 at 9:00 a.m.**, before Immigration Judge Lori Adams. Petitioner therefore has an active, ongoing pursuit of protection before the Immigration Court — and every reason to appear and prosecute his claims to conclusion.

D. The July 2, 2026 Detention — Without Any Individualized Determination or Hearing

19. On **June 2, 2026**, Petitioner was arrested by local police in Wake County, North Carolina, and charged with two misdemeanor offenses (Assault on a Female and a Misdemeanor Crime of Domestic Violence) in Case No. 26CR323103-910 in the General Court of Justice, District Court Division, Wake County. On June 30, 2026, the Wake County District Attorney, through Assistant District Attorney Jay Brocker, dismissed both charges in full, expressly citing insufficient evidence. Notwithstanding that dismissal, Petitioner was transferred into ICE custody the day after his initial arrest, on July 2, 2026, and has since been detained at the Stewart Detention Center.

20. Petitioner has **no criminal conviction**. The matter referenced above resulted in no conviction whatsoever: the Wake County District Attorney formally dismissed both charges in full for

insufficient evidence. A dismissed charge is not a conviction, cannot serve as a finding of fact against Petitioner, and cannot support any inference of dangerousness. Even had the charges not been dismissed, misdemeanor charges of Assault on a Female and a Misdemeanor Crime of Domestic Violence are not aggravated felonies, and they are not among the offenses that subject a noncitizen to mandatory detention under 8 U.S.C. § 1226(c). *See Leocal v. Ashcroft*, 543 U.S. 1, 11-13 (2004).

21. From the date of his transfer into immigration custody on July 2, 2026, to the date of this filing, **no bond hearing of any kind has been held**. No Immigration Judge has made any individualized determination of whether Petitioner poses a danger to the community or a risk of flight. He has been held in civil immigration detention without any hearing, without any individualized finding, and without the process the Fifth Amendment requires.

IV. ARGUMENT

A. Freedom From Physical Restraint Is a Core Liberty Interest, and Civil Detention Is Permissible Only With Adequate Process

22. The Fifth Amendment guarantees that no person shall "be deprived of life, liberty, or property, without due process of law." That guarantee protects all persons within the United States, citizens and noncitizens alike. *Zadvydas*, 533 U.S. at 693. Freedom from physical restraint "has always been at the core of the liberty protected by the Due Process Clause." *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992).

23. Because of the weight of that interest, civil detention is constitutionally permissible only in narrow circumstances and only when accompanied by adequate procedural safeguards. Civil confinement must bear a reasonable relation to a legitimate, non-punitive governmental purpose, and it may never be imposed as punishment. *United States v. Salerno*, 481 U.S. 739, 746-48 (1987); *Bell v. Wolfish*, 441 U.S. 520, 535-37 (1979); *Zadvydas*, 533 U.S. at 690.

24. Where the government seeks to detain a person on the basis of dangerousness or risk of flight, due process ordinarily requires that the predicate for detention be established before a neutral decisionmaker and by **clear and convincing evidence**. *Addington v. Texas*, 441 U.S. 418, 432-33 (1979); *Foucha*, 504 U.S. at 81-83. Petitioner has received none of this process: no hearing, no neutral adjudicator, and no finding of any kind.

B. The Mathews Balancing Factors Each Favor an Individualized Hearing

25. When evaluating what process is due, courts weigh (1) the private interest affected; (2) the risk of erroneous deprivation under the procedures used and the probable value of additional safeguards; and (3) the government's interest, including the burdens that added process would entail. *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976). All three considerations point the same way here.

26. **First,** Petitioner's private interest is at its constitutional apex. He faces the most severe deprivation civil law permits — the loss of physical liberty. He was paroled and released into the community by the government itself, complied with every condition of that release for more than fourteen months, and is actively pursuing protection before the Immigration Court. The interest at stake is not merely significant; it is fundamental.

27. **Second,** the risk of erroneous deprivation is total. Where no hearing has occurred, there is no mechanism by which error can be identified or corrected. No neutral adjudicator has assessed whether Petitioner presents any danger or flight risk; the government's position rests on no individualized finding at all. The probable value of a single, prompt bond hearing is therefore enormous, while its cost to the government is minimal — such hearings are a routine feature of immigration practice. *Cf. Aliaga Zamora v. Bondi*, No. SA-26-CA-00447-XR, 2026 WL 693054, at *13 (W.D. Tex. Mar. 10, 2026).

28. **Third,** the government's interest in detaining this particular individual without a hearing is slight. The legitimate purposes of immigration detention — ensuring appearance and protecting the community — are already well served by Petitioner's demonstrated record of compliance, his ongoing applications for relief, and his established community ties. To the extent the government believes any such interest remains, it can readily present that position at a hearing. The government has no legitimate interest in detention *without* process.

C. Petitioner Is Properly Detained, If at All, Under 8 U.S.C. § 1226(a) and Is Entitled to a Bond Hearing

29. The immigration laws distinguish among categories of custody. Section 1225 addresses applicants for admission; § 1226 governs noncitizens in removal proceedings present within the United States — subsection (a) authorizing discretionary detention with release on bond, and subsection (c) requiring detention only for noncitizens who have committed specifically enumerated criminal offenses; and § 1231 governs detention after a final order of removal.

30. Petitioner falls within § 1226(a). He was paroled and physically released into the interior of the United States on December 2, 2024, established residence in Raleigh, North Carolina, and is now in removal proceedings under INA § 240. He is therefore eligible for release on bond and entitled to an individualized custody determination before an Immigration Judge. 8 C.F.R. §§ 1003.19, 1236.1(d).

31. To the extent Respondents may characterize Petitioner as an "arriving alien" subject to mandatory detention under § 1225(b), that characterization cannot be reconciled with the facts or with due process. Petitioner is not standing at the border seeking initial admission; he was inspected and paroled into the interior more than fourteen months before his re-detention, established residence in Raleigh, and remained continuously compliant with his obligations. The Supreme Court has made clear that the constitutional concern with prolonged, unreviewed detention applies with equal force to noncitizens treated as seeking admission. *Clark v.*

Martinez, 543 U.S. 371, 378-82 (2005). The government cannot have it both ways. If Respondents maintain that Petitioner is an arriving alien under § 1225, the regulations strip the Immigration Judge of any authority to set bond or order release. 8 C.F.R. § 1003.19(h)(2)(i)(B). That position does not justify detention without process; it confirms that the only forum capable of providing any custody review is this Court. A reading of the statutes under which a long-released parolee may be detained indefinitely, with no bond hearing available before any tribunal, is precisely the result the Fifth Amendment forbids and that the doctrine of constitutional avoidance counsels against. *Zadvydas v. Davis*, 533 U.S. 678, 689-90 (2001); *Clark v. Martinez*, 543 U.S. 371, 380-82 (2005).

32. *Demore v. Kim* does not counsel otherwise. *Demore* sustained the brief mandatory detention of a noncitizen who conceded that he fell within the criminal-detention provision of § 1226(c). 538 U.S. at 513, 531. Petitioner is not within § 1226(c): he has no qualifying conviction — indeed, no conviction at all. The premise of *Demore* is therefore absent, and the discretionary, bond-eligible framework of § 1226(a) governs.

33. Finally, even if § 1225(b) were thought to supply the statutory authority for detention, that would not answer the constitutional question. *Jennings v. Rodriguez* resolved only a question of statutory interpretation and expressly remanded the detainees' constitutional due-process claims for decision. 583 U.S. at 313-14. The constitutional floor remains intact: prolonged civil detention, with no individualized hearing and no foreseeable end, cannot be squared with the Fifth Amendment. *Zadvydas*, 533 U.S. at 690-91.

D. Dismissed Criminal Charges Cannot Justify Detention Without a Hearing

34. As set forth above, the only criminal matter of record against Petitioner — the Wake County charges in Case No. 26CR323103-910 — has been dismissed in full for insufficient evidence. Even had the charges not been dismissed, they are misdemeanor charges that are not aggravated felonies, and it is not among the offenses enumerated in § 1226(c). *Leocal*, 543 U.S. at 11-13. It does not subject Petitioner to mandatory detention.

35. Nor can an arrest, standing alone, supply a constitutional basis for civil confinement without a hearing. An arrest is not a conviction; the charge here is unadjudicated, no conviction has entered, and the presumption of innocence applies. An unproven allegation cannot be treated as a finding of dangerousness. *Foucha*, 504 U.S. at 80. Whether the matter bears at all on custody is precisely the kind of individualized question reserved to a neutral Immigration Judge on an evidentiary record — not one that may be resolved without any hearing at all.

E. Continued Detention Without a Hearing Serves No Legitimate, Non-Punitive Purpose

36. The only constitutionally legitimate purposes of immigration detention are to secure the noncitizen's appearance and to protect the community. *Zadvydas*, 533 U.S. at 690-91. Both purposes are already addressed here: Petitioner's years of compliance and supervision, his pending applications for relief, and his fixed residence and community ties all confirm that he

will appear, and nothing in this record suggests that he poses a danger. Detention that bears no reasonable relation to these purposes risks operating as punishment, which civil detention may not be. *Bell v. Wolfish*, 441 U.S. at 535; *Salerno*, 481 U.S. at 746-47.

37. Consistent with these principles, the government should bear the burden of justifying continued detention, and should be required to do so by clear and convincing evidence before a neutral Immigration Judge. *Addington*, 441 U.S. at 432-33; *Foucha*, 504 U.S. at 81-83; *see also Rojas v. Noem*, 2025 WL 3038262, at *4 (W.D. Tex. Oct. 30, 2025).

F. Courts Have Granted Relief on Materially Similar Facts

38. Federal courts have repeatedly granted habeas relief to noncitizens who were paroled into the United States, released into the community, and later re-detained without an individualized bond hearing. *See Longoria Mendoza v. Noem*, No. 5:26-CV-0728-JKP, 2026 WL 809441 (W.D. Tex. Feb. 26, 2026); *Aliaga Zamora v. Bondi*, 2026 WL 693054 (W.D. Tex. Mar. 10, 2026); *Rojas v. Noem*, 2025 WL 3038262 (W.D. Tex. Oct. 30, 2025).

39. As one court observed, absent evidence of a change in a detainee's individualized circumstances, re-detention without a hearing serves no permissible purpose. *Aliaga Zamora*, 2026 WL 693054, at *13. Petitioner's circumstances fit that principle squarely. He is a lawfully paroled individual, released and compliant for more than fourteen months, actively pursuing protection through a timely-filed asylum application, whose only criminal matter of record has been dismissed for insufficient evidence, and who was placed in immigration custody without any hearing or individualized finding. The Constitution requires that he be heard.

V. EXHAUSTION OF ADMINISTRATIVE REMEDIES IS EXCUSED

40. Any exhaustion requirement applicable here is prudential rather than jurisdictional, and is excused where (1) administrative remedies would be futile; (2) irreparable harm would result from delay, or (3) the question presented is purely legal. *McCarthy v. Madigan*, 503 U.S. 140, 144-48 (1992); *Bowen v. City of New York*, 476 U.S. 467, 482-86 (1986). Each condition is satisfied.

41. **Futility.** No administrative remedy is available to Petitioner. If Respondents treat him as an arriving alien under § 1225, an Immigration Judge is expressly forbidden from conducting a bond hearing or ordering his release, 8 C.F.R. § 1003.19(h)(2)(i)(B), so there is no custody process for him to pursue or exhaust. And if he is instead detained under § 1226(a), the bond hearing to which he is entitled has not been provided and no mechanism exists to compel one on the emergency timeline his continued confinement requires. Under either view, resort to the agency would be futile.

42. **Irreparable Harm.** Each additional day of detention without process is itself a constitutional injury that cannot later be undone. Removal would extinguish Petitioner's pending claims for

protection and could moot this Petition, and transfer outside this District would frustrate the Court's jurisdiction.

43. **Pure Question of Law.** Whether the Fifth Amendment requires an individualized bond hearing for a person in Petitioner's circumstances is a legal question this Court is fully competent to resolve on the present record.

VI. EMERGENCY REQUEST FOR TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

44. To preserve the Court's ability to grant meaningful relief, Petitioner respectfully requests a temporary restraining order and preliminary injunction. The familiar four factors are satisfied. *Winter v. Natural Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008)

45. **Likelihood of Success.** For the reasons stated above, Petitioner's due-process claim is well founded and well supported. He was paroled and released into the community by the government itself; he complied with every condition of release for more than fourteen months; he is pursuing protection before the Immigration Court through a timely-filed I-589; he is detained, if at all, under § 1226(a) and is bond-eligible; the only criminal matter of record has been dismissed for insufficient evidence and does not constitute a § 1226(c) predicate; and no hearing has been held.

46. **Irreparable Harm.** The deprivation of a constitutional right constitutes irreparable harm. *Elrod v. Burns*, 427 U.S. 347, 373 (1976). Removal would extinguish Petitioner's pending claims and could moot this Petition; transfer outside the District would defeat the Court's jurisdiction.

47. **Balance of Equities and the Public Interest.** Preserving the status quo imposes no meaningful burden on the government, while it prevents an irreparable loss of rights and protects the Court's jurisdiction. The public interest is served by faithful adherence to the Constitution and by orderly judicial review of executive detention. These factors merge where, as here, the government is the opposing party.

48. Petitioner specifically requests: (a) an order prohibiting Respondents from transferring him outside the Middle District of Georgia without leave of Court; (b) an order prohibiting Respondents from removing him from the United States while this Petition is pending; and (c) an order requiring Respondents to notify the Court and Petitioner immediately of any attempt to transfer or remove him.

VII. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

Petitioner seeks his release; he requests an individualized bond hearing only as alternative relief, in recognition that such a hearing is, at minimum, the irreducible process the Constitution requires.

1. Issue a writ of habeas corpus pursuant to 28 U.S.C. § 2241,
2. Order Respondents to show cause within 48 hours why Petitioner's continued detention, without any individualized bond hearing, is consistent with the Constitution;
3. Order Petitioner's release from immigration detention on his own recognizance or under reasonable conditions of supervision;
4. In the alternative, order Respondents to provide Petitioner a constitutionally adequate bond hearing within 72 hours, before a neutral Immigration Judge, at which the government bears the burden of demonstrating by clear and convincing evidence that Petitioner presents a danger to the community or a risk of flight;
5. Enter a temporary restraining order and preliminary injunction prohibiting Respondents from transferring Petitioner outside the Middle District of Georgia or removing him from the United States while this Petition is pending, without leave of Court;
6. Order Respondents to notify the Court and Petitioner immediately of any attempt to transfer or remove Petitioner; and
7. Grant such other and further relief as the Court deems just and proper.

VIII. VERIFICATION

I, **ALEXANDER JOSE TORRES CARDENAS**, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I am the Petitioner in this action; that I am detained at the Stewart Detention Center, 146 CCA Road, Lumpkin, Georgia 31815; that I am filing this Petition *pro se*; and that the factual statements set forth in this Petition are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

ALEXANDER TORRES

Date: 07/21/2026, 2026

ALEXANDER JOSE TORRES CARDENAS
Petitioner, Pro Se
Stewart Detention Center
146 CCA Road, Lumpkin, GA 31815
A-Number: [redacted]