Christiam José Contreras Rodríguez
Country of Birth: Venezuela
A-Number: [redacted]
Current Detention Facility: STEWART DETENTION CENTER
146 CCA Road, Lumpkin, Georgia 31815
Visitor Information: (229) 838-5000
Pro Se

**UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF GEORGIA COLUMBUS DIVISION**

Christiam José Contreras Rodríguez
A-Number: [redacted]
Proceeding Pro Se,
*Petitioner,*
v.
**_____, WARDEN, Stewart Detention Center; _____, FIELD OFFICE DIRECTOR, ICE Enforcement and Removal Operations, Atlanta Field Office; DAVID J. VENTURELLA, Acting Director, United States Immigration and Customs Enforcement; MARKWAYNE MULLIN, Secretary, Department of Homeland Security; TODD BLANCHE, Acting Attorney General, United States,**
*Respondents.*

Civil Action No.: 4:26-cv-1061-CDL-CHW

PETITION FOR WRIT OF HABEAS CORPUS

Petitioner Christiam José Contreras Rodríguez files this Petition pro se. He respectfully requests that the Court construe his pleadings liberally.

**NATURE OF THE CASE**

1. This is a Petition for a Writ of Habeas Corpus under 28 U.S.C. § 2241 seeking Petitioner Christiam José Contreras Rodríguez's immediate release from unlawful civil immigration detention at the Stewart Detention Center in Lumpkin, Georgia.
2. This Petition does not request that this Court review the merits of Petitioner's asylum claim, determine his removability, or reconsider the discretionary weighing of bond factors. It challenges whether Respondents possess any coherent statutory and constitutional authority to maintain Petitioner's present physical custody.

3. On April 2, 2024, DHS issued Petitioner a Form I-286 under INA § 236 authorizing his release on his own recognizance, and formalized his release through a Form I-220A. His release was expressly governed by INA § 236 (8 U.S.C. § 1226), not by parole or § 1225(b). Petitioner was placed in ordinary removal proceedings under INA § 240.
4. Petitioner thereafter remained openly in the community for approximately 780 days—from April 2, 2024 until May 22, 2026—maintained a stable residence in North Carolina, reported monthly to ICE, worked in construction, supported his U.S. citizen son and his partner, and incurred no criminal history.
5. On May 22, 2026, Petitioner voluntarily appeared for his scheduled monthly ICE check-in at the Charlotte, North Carolina ICE office. Without prior notice, without a warrant, without a neutral pre-deprivation hearing, without identifying any material changed circumstance, without producing a formal revocation of the liberty previously granted under the I-220A, and without clearly identifying whether custody rests upon 8 U.S.C. §§ 1225(b), 1226, or 1231, ICE agents arrested Petitioner, handcuffed him, transported him in chains to the Stewart Detention Center in Lumpkin, Georgia.
6. On June 30, 2026, Immigration Judge Bianca H. Brown denied Petitioner's request for a custody redetermination, finding that she lacked jurisdiction under *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025). The Immigration Judge did not evaluate Petitioner's dangerousness, flight risk, compliance history, family ties, employment, community connections, or alternative conditions of release. The denial was exclusively jurisdictional.
7. Petitioner's detention is therefore unlawful from its inception. The Immigration Judge's jurisdictional ruling rests upon a statutory interpretation that the Eleventh Circuit has since rejected. The appropriate habeas remedy is immediate release and restoration of the status

quo that existed before the unlawful redetention.

**JURISDICTION AND VENUE**

8. This Court has subject matter jurisdiction to grant a writ of habeas corpus pursuant to 28 U.S.C. § 2241(a), which provides that "[w]rits of habeas corpus may be granted by . . . the district courts . . . within their respective jurisdictions." Petitioner is in the custody of Respondents and challenges his detention as being in violation of the Constitution and laws of the United States. See *Jennings v. Rodriguez*, 138 S. Ct. 830, 842 (2018) (recognizing habeas corpus as the vehicle for challenging immigration detention)
9. Venue is proper in the United States District Court for the Middle District of Georgia, Columbus Division, because Petitioner is physically confined at the Stewart Detention Center, located at 146 CCA Road, Lumpkin, Georgia 31815, in Stewart County, which lies within the Columbus Division of the Middle District of Georgia. See 28 U.S.C. § 90(a)(2).
10. This Petition challenges only the legality of Petitioner's present physical detention. Petitioner does not seek review of the merits of his asylum application or any potential removal order.

**PARTIES**

11. Petitioner **CHRISTIAM JOSÉ CONTRERAS RODRÍGUEZ** is a native and citizen of Venezuela, born on [redacted] in Tovar, State of Mérida, Venezuela. His Alien Registration Number is [redacted]. He is currently detained by Respondents at the Stewart Detention Center.
12. Respondent _____, **WARDEN** of the Stewart Detention Center, is the individual with immediate physical custody of Petitioner.
13. Respondent _____, **FIELD OFFICE DIRECTOR** of ICE Enforcement and Removal

Operations, Atlanta Field Office, is the ICE official responsible for detention operations in the region where Petitioner is detained.

14. Respondent **DAVID J. VENTURELLA, Acting Director of United States Immigration and Customs Enforcement**, is responsible for the administration and enforcement of federal immigration laws, including the detention of noncitizens.

15. Respondent **MARKWAYNE MULLIN, Secretary of the U.S. Department of Homeland Security**, is responsible for the administration and enforcement of federal immigration laws, including the detention of noncitizens.

16. Respondent **TODD BLANCHE, Acting Attorney General of the United States**, is the chief law enforcement officer of the United States and has authority over the Executive Office for Immigration Review.

**STATEMENT OF FACTS**

17. Petitioner is a Venezuelan citizen who left Venezuela on January 15, 2024, fleeing political persecution and violence. He arrived near El Paso, Texas, on approximately April 1, 2024.

18. On April 2, 2024, CBP served Petitioner with a Notice to Appear ("NTA") under INA § 240, charging him as inadmissible under INA § 212(a)(6)(A)(i). Petitioner was placed in ordinary removal proceedings — not expedited removal.

19. On the same date, April 2, 2024, DHS issued a Form I-286 (Notice of Custody Determination) that expressly invoked INA § 236 and 8 C.F.R. Part 236 as the authority for Petitioner's custody determination. The I-286 ordered Petitioner's release on his own recognizance, without monetary bond.

20. Also on April 2, 2024, DHS issued a Form I-220A (Order of Release on Recognizance) that confirmed Petitioner's release under INA § 236. The conditions of release included:

appearing before DHS and EOIR; surrendering for removal if ordered; reporting personally to ICE as directed; not changing residence without authorization, not violating any laws; and assisting DHS in obtaining travel documents.

21. Petitioner's release was not parole. It was a release on own recognizance under § 236 through the I-286 and I-220A.

22. After his release, Petitioner established his life in North Carolina. He resided at multiple addresses in the state, including [redacted] Liberty, North Carolina 27229, and later [redacted] Asheboro, North Carolina 27203.

23. Petitioner reported monthly to ICE at the Charlotte, North Carolina ICE office, located at 3411 St. Vardell Lane, Suite B, Charlotte, North Carolina 28217. He appeared for every scheduled check-in during approximately 780 days of liberty.

24. On September 9, 2024, Petitioner filed a Form I-589 application for asylum, withholding of removal, and protection under the Convention Against Torture ("CAT"). The application was filed within one year of entry, as required. The application is based on Petitioner's political opinion and fear of torture if returned to Venezuela. [redacted] The asylum application remains pending.

25. On December 6, 2024, the Miami Immigration Court granted Petitioner's change of venue request, transferring his case to the Charlotte Immigration Court.

26. Petitioner worked for [redacted] beginning approximately March 2026. His employer, Antonio Calis, described Petitioner as punctual, reliable, and skilled in construction, vehicle repair, and software.

27. On [redacted] Petitioner's son, C[redacted] was born at Chatham Hospital UNC Health in Siler City, Chatham County, North Carolina. C[redacted] is a U.S. citizen by birth. Paternity is confirmed by both the birth certificate and an Affidavit of Parentage. At the time of Petitioner's arrest, C[redacted] was approximately three months old.

28. Petitioner's partner, Yasmin Andrea Zambrano Posadas, was financially dependent on Petitioner. She did not work and cared for their infant son. Petitioner was the primary economic and emotional support for his family

29. Petitioner has no criminal record. A certified search by the Clerk of Superior Court of Randolph County, North Carolina, conducted on May 27, 2026, found no criminal records or infractions under Petitioner's name. Petitioner's I-589 application likewise reports no arrests, charges, or convictions in the United States.

30. On May 22, 2026, after 780 days of continuous liberty and compliance, Petitioner voluntarily appeared for his scheduled monthly ICE check-in at the Charlotte, North Carolina ICE office. The employee who normally processed his check-in was not present. Another official led Petitioner to an office where four agents were waiting. They informed him: "Hola Christiam, queda arrestado" ("Hello Christiam, you are under arrest"). Petitioner was handcuffed, taken through a back door, and transported to an unidentified immigration holding facility in Charlotte. That night, he was transported in chains—hands and feet shackled—to the Stewart Detention Center in Lumpkin, Georgia.

31. ICE has not produced: a Form I-200 or arrest warrant; a new Form I-286; a notice of revocation of the I-220A; a document identifying § 1225, § 1226, or any other statutory basis for the new custody; or any written explanation of a violation, danger, flight risk, or

material change in circumstances.

32. On June 30, 2026, Immigration Judge Bianca H. Brown denied Petitioner's request for a custody redetermination. The denial was based exclusively on *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), in which the BIA held that an Immigration Judge lacks jurisdiction to redetermine bond for certain noncitizens detained under § 1225(b). The Immigration Judge did not find Petitioner to be dangerous. She did not find him to be a flight risk. She did not evaluate whether reasonable conditions could ensure his appearance. She did not consider his 780 days of compliance, his U.S. citizen son, his partner's dependence, his employment, his community ties, or any alternative conditions of release.

33. DHS waived appeal. Petitioner reserved appeal. The deadline for the BIA to receive the appeal is July 30, 2026. As of July 27, 2026, the BIA has not received an appeal.

34. Petitioner's immigration case remains pending before the Stewart Immigration Court. A master hearing is scheduled for August 10, 2026, at 10:00 a.m. before Immigration Judge Jerrica A. Harness. No final order of removal has been issued.

35. Petitioner has been in continuous custody since May 22, 2026—66 complete days as of July 27, 2026.

36. Petitioner has not filed any previous federal habeas corpus petition. The only prior custody proceeding is the June 30, 2026 bond redetermination that was denied on jurisdictional grounds.

**EXHAUSTION OF ADMINISTRATIVE REMEDIES**

37. Petitioner has pursued available administrative remedies. He appeared before Immigration Judge Bianca H. Brown on June 30, 2026, and requested a custody redetermination. The Immigration Judge denied the request on jurisdictional grounds without reaching the

merits. Petitioner reserved appeal, and the deadline is July 30, 2026.

38. To the extent Respondents contend that an Immigration Judge lacks custody jurisdiction under *Matter of Q. Li*, administrative review would be futile or inadequate. The Immigration Judge has already declared that she lacks jurisdiction. An appeal to the BIA would require the BIA to reconsider its own precedent in *Matter of Q. Li* in light of binding Eleventh Circuit authority, which the BIA may be institutionally reluctant to do.

39. The immigration court also lacks authority to adjudicate the constitutional claims raised herein, including Petitioner's Fifth Amendment right to due process before deprivation of his liberty interest in remaining at liberty.

40. Requiring Petitioner to exhaust remedies that have already been denied or that cannot provide the relief sought, while he suffers ongoing deprivation of liberty and irreparable harm to his family, would serve no legitimate purpose. Accordingly, any exhaustion requirement should be excused on grounds of futility, irreparable harm, and the inherently constitutional nature of the claims presented.

**STATEMENT OF CLAIMS**

**FIRST CLAIM FOR RELIEF**

**Unlawful Redetention Without Notice, Revocation, or Materially Changed Circumstances**

41. Petitioner possessed a substantial liberty interest arising from the Government's own decision to release him on his own recognizance under INA § 236, formalized through the I-286 and I-220A, and to allow him to live openly in the community for 780 days. See *Ortiz Vargas v. Jennings*, No. 19-cv-07430-DMR, 2020 U.S. Dist. LEXIS 152814, at *16–17 (N.D. Cal. Aug. 23, 2020) (finding a noncitizen released on bond has a "protectable liberty interest in remaining out of custody"); *Rosales-Garcia v. Holland*, 238 F.3d 704, 720 (6th

Cir. 2001) ("[A]liens—even excludable aliens—are 'persons' entitled to the Constitution's most basic protections and strictures.").

42. That liberty could not be revoked arbitrarily. Before redetaining Petitioner, Respondents were required to identify what circumstance had materially changed, what condition Petitioner had violated, what evidence justified renewed custody, and what statutory authority permitted the detention. See *Morrissey v. Brewer*, 408 U.S. 471, 482 (1972) (liberty interest in remaining at liberty requires due process before revocation).

43. Respondents provided no advance notice, no formal revocation, no individualized explanation, and no pre-deprivation process before agents arrested Petitioner during a voluntary ICE check-in and deprived him of his liberty.

44. Respondents have identified no missed hearing, violation of release conditions, new criminal conduct, or other material event arising after Petitioner's April 2, 2024 release.

45. Respondents therefore revoked an existing liberty interest without constitutionally sufficient process, in violation of the Fifth Amendment. See *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976) (due process requires balancing the private interest affected, the risk of erroneous deprivation, and the government's interest).

**SECOND CLAIM FOR RELIEF**

**Wrong Statutory Basis for Custody: Section 1226(a) Governs, Not Section 1225(b)(2)(A)**

46. Respondents have not established whether Petitioner is presently detained under 8 U.S.C. § 1225(b)(2)(A), § 1226(a), § 1226(c), or § 1231(a). However, the documentary evidence overwhelmingly establishes that § 1226(a) governs Petitioner's custody.

47. The Form I-286 issued on April 2, 2024, expressly cites INA § 236 (codified at 8 U.S.C. § 1226) as the authority for the custody determination. The Form I-220A of the same date

likewise confirms release under § 236.

48. Petitioner was placed in ordinary removal proceedings under INA § 240, not expedited removal. He was charged under INA § 212(a)(6)(A)(i).

49. Petitioner was released on his own recognizance—not parole, not expedited removal, and not mandatory detention under § 1225(b)

50. Section 1226(c) does not apply because Petitioner has no criminal convictions, no criminal charges, and no terrorism-related category that would trigger mandatory detention.

51. Section 1231(a) does not apply because no final order of removal exists. Petitioner's case is pending before the Stewart Immigration Court with a master hearing scheduled for August 10, 2026.

52. The Immigration Judge's reliance on *Matter of Q. Li* to deny jurisdiction was predicated on the theory that § 1225(b)(2)(A) governs Petitioner's custody. However, Petitioner's own custody documents—issued by DHS itself—expressly invoke § 236 (§ 1226). The Government cannot now contradict its own documents to impose a more restrictive statutory framework.

53. Under the principle that an agency must follow its own rules and procedures, Respondents may not disregard the governmental actions and reliance interests created by the I 286 and I-220A without a reasoned and lawful decision. See *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 285–86 (1954) (agencies are bound by their own regulations); *Shaughnessy v. United States ex rel. Accardi*, 349 U.S. 280 (1955).

54. Because § 1226(a) governs Petitioner's custody, the Immigration Judge possessed jurisdiction to conduct a bond redetermination. The Immigration Judge's contrary ruling was legally erroneous.

**THIRD CLAIM FOR RELIEF**

**The Immigration Judge's Jurisdictional Denial Contradicts Binding Authority**

55. The Immigration Judge denied custody redetermination on June 30, 2026, exclusively because she believed she lacked jurisdiction under *Matter of Q. Li*. She did not reach the merits.

56. The Eleventh Circuit has issued binding authority directly contrary to the expansive application of § 1225(b)(2)(A) that *Matter of Q. Li* represents. In *Hernandez Alvarez v. Warden*, Nos. 25-14065 and 25-14075 (11th Cir. May 6, 2026), the Eleventh Circuit held that § 1225(b)(2)(A) does not govern the custody of noncitizens who, though not formally admitted, are simply present in the interior of the United States. The court confirmed that their custody falls under § 1226(a), which affords the right to a bond hearing.

57. Petitioner's case is indistinguishable from *Hernandez Alvarez* in all material respects. Petitioner was released under § 236, remained in the interior for 780 days, was redetained at an interior ICE office, and has a pending case under § 240. His custody documents invoke § 236, not § 1225(b).

58. Moreover, the Middle District of Georgia has issued Standing Order 2026-01, which requires bond hearings within seven (7) days for individuals detained at the Stewart Detention Center whose custody is governed by § 1226(a) under the *Hernandez Alvarez* interpretation.

59. The Immigration Judge's denial of jurisdiction under *Matter of Q. Li* directly contradicts this binding Eleventh Circuit authority. A published decision of the Eleventh Circuit controls over an incompatible BIA interpretation in this Circuit.

60. Because the Immigration Judge erroneously denied jurisdiction, Petitioner has never

received an individualized assessment of his custody. No adjudicator has evaluated his dangerousness, flight risk, family ties, employment, compliance history, community connections, or alternative conditions of release. This deprivation of individualized process violates the Fifth Amendment. See *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976).

**FOURTH CLAIM FOR RELIEF**

**Habeas Requires Immediate Release Because a Later Hearing Cannot Cure the Violation**

61. The constitutional violation was complete when Respondents redetained Petitioner without notice, a lawful revocation, a neutral pre-deprivation process, or proof of materially changed circumstances.

62. A hearing held only after Petitioner was arrested, incarcerated, and transported 500 miles from his home and family cannot retroactively validate the original deprivation of liberty. See *Preiser v. Rodriguez*, 411 U.S. 475, 500 (1973) ("[W]hen a state prisoner is challenging the very fact or duration of his physical imprisonment, and the relief he seeks is a determination that he is entitled to immediate release . . . , his sole federal remedy is a writ of habeas corpus.").

63. A later bond or custody proceeding would address whether Petitioner should remain detained prospectively. It would not remedy the Government's unlawful seizure of a person whom it had previously released on his own recognizance and who had complied with all conditions for 780 days.

64. The traditional function of habeas corpus is release from unlawful physical custody. See *Jennings v. Rodriguez*, 138 S. Ct. 830, 842 (2018) (recognizing habeas corpus as the vehicle for challenging immigration detention); *Preiser v. Rodriguez*, 411 U.S. 475, 500 (1973).

65. Because Respondents have failed to establish a lawful basis for the original redetention, the Court should restore the *status quo ante* and order Petitioner's immediate release under the conditions that governed his liberty before May 22, 2026. The *status quo ante* was Petitioner's physical liberty in the community, subject to the immigration reporting and court-appearance obligations that lawfully applied before May 22, 2026.

66. Any lesser remedy would permit the Government to obtain the benefit of an unconstitutional detention and would leave Petitioner vulnerable to repeated redetention under the same unexplained theory

**FIFTH CLAIM FOR RELIEF**

**Absence of Dangerousness, Flight Risk, and Availability of Alternative Conditions**

67. Petitioner has no criminal record. A certified search by the Clerk of Superior Court of Randolph County, North Carolina, found no criminal records or infractions under his name.

68. Petitioner demonstrated 780 days of continuous compliance with all release conditions, including monthly ICE check-ins. He was arrested while voluntarily appearing for a check-in, which demonstrates that he was not evading immigration authorities.

69. Petitioner has a U.S. citizen son, C[redacted] born [redacted] who depends on him for economic and emotional support. Petitioner's partner, Yasmin Andrea Zambrano Posadas, does not work and relies on Petitioner's support.

70. Petitioner has a pending asylum application based on political persecution in Venezuela, giving him every incentive to appear for all immigration proceedings.

71. Petitioner has community ties in North Carolina, including his partner, his U.S. citizen son, his employer, and his church community. Letters of support have been provided by his partner, his employer, a pastor, U.S. citizen military veterans, and coworkers.

72. No adjudicator has ever found Petitioner to be dangerous or a flight risk. The Immigration Judge's denial was exclusively jurisdictional.

73. Petitioner is willing to comply with any reasonable conditions of release, including: regular ICE reporting; attendance at all immigration court hearings; electronic monitoring or GPS; travel restrictions; notification of any change of address; and any other reasonable nonmonetary condition.

74. Under due process principles, the Government must bear the burden of proving by clear and convincing evidence that continued detention is justified, and must consider alternative conditions of release. See *Dubon Miranda v. Barr*, No. 20-cv-01140 (D. Md. May 29, 2020) (requiring consideration of ability to pay and alternative conditions of release); *Xochitl Hernandez v. Jefferson Sessions*, 872 F.3d 976, 991 (9th Cir. 2017) (bond determination must consider financial circumstances and alternative release conditions); see also *Maxi Dinga Sopo v. U.S. Attorney General*, 825 F.3d 1199, 1215 (11th Cir. 2016) (Pryor, J., concurring) (government should bear burden of proving necessity of continued detention by clear and convincing evidence).

**ARGUMENT**

Respondents cannot convert their own unexplained administrative actions into authority for executive custody. DHS expressly released Petitioner under INA § 236, as memorialized in the Form I-286 and Form I-220A. It allowed him to establish a life, raise a U.S. citizen child, and comply with all conditions of supervision for 780 days.

Respondents then arrested Petitioner during a voluntary ICE check-in, an act of compliance, without identifying any new offense, violation, failure to appear, change in dangerousness, increased risk of flight, formal revocation, or any other material circumstance arising after the

Government's April 2024 decision to grant him liberty. This arbitrary redetention violated the fundamental constitutional principle that a liberty interest, once granted, cannot be taken away without due process.

The subsequent denial of a bond hearing was based on a manifest legal error. The Immigration Judge's jurisdictional denial under *Matter of Q. Li* directly contradicts the Eleventh Circuit's binding decision in *Hernandez Alvarez v. Warden*, which held that § 1226(a) governs the custody of noncitizens present in the interior, not the more restrictive § 1225(b)(2)(A). Petitioner's facts—initial release under § 236, redetention in the interior, and placement in § 240 proceedings—fall squarely within the protective scope of *Hernandez Alvarez*. This Court's own Standing Order 2026-01 further confirms the right to a bond hearing within seven days for detainees at Stewart whose custody is governed by § 1226(a). The Immigration Judge's ruling was contrary to controlling law in this jurisdiction.

The constitutional violation occurred at the moment Petitioner was deprived of the liberty the Government had previously granted, without notice, reasoned explanation, or constitutionally adequate process. A future custody or bond hearing, while necessary as an alternative, cannot retroactively cure that completed deprivation. The proper and traditional remedy in habeas corpus is to correct the unlawful custody by returning the petitioner to the state in which he was before the unlawful act.

The Court should therefore restore the *status quo ante* by ordering Petitioner's immediate release under the same or comparable noncustodial conditions that existed before May 22, 2026.

Petitioner seeks immediate release because Respondents lacked lawful authority and constitutionally adequate process when they redetained him. Any subsequent custody proceeding would be a post-deprivation procedure incapable of curing the completed violation.

**PRAYER FOR RELIEF**

WHEREFORE, Petitioner respectfully requests that this Court:

A. **Grant Habeas Corpus Relief.** Grant the Petition for Writ of Habeas Corpus;

B. **Declare Unlawful Detention.** Declare that Respondents' redetention and continued custody of Petitioner violate 28 U.S.C. § 2241, the Immigration and Nationality Act, and the Due Process Clause of the Fifth Amendment;

C. **Order Immediate Response.** Require Respondents to show cause within seven (7) days why the writ should not issue, and to file any response within that period;

D. **Order Immediate Release.** Order Respondents to release Petitioner immediately from physical custody and restore him to the noncustodial status and conditions that existed before his May 22, 2026 redetention;

E. **Prohibit More Restrictive Conditions.** Prohibit Respondents from imposing new or more restrictive conditions as a substitute for detention without a reasoned written determination;

F. **Prohibit Unlawful Re-Arrest.** Prohibit Respondents from redetaining Petitioner based solely on facts and legal theories known to DHS in April 2024, absent materially changed circumstances, adequate written notice, and constitutionally sufficient pre-deprivation process, except where Respondents demonstrate a genuine and documented emergency;

G. **Order Production of Records.** Order Respondents to produce or lodge the custody records necessary to establish the legal basis for detention, including any Form I-200, I-213, I-286, I-220A revocation, custody determination from May 22, 2026, and records relating to the statutory basis for redetention;

H. **Prohibit Transfer or Removal.** Prohibit Respondents from removing Petitioner from the

United States or transferring him outside this District until the Court resolves this Petition or issues further order;

I. **Order Notice of Compliance.** Require Respondents to serve the release order directly upon the Stewart Detention Center and file a notice of compliance within twenty-four hours,

J. **Retain Jurisdiction.** Retain jurisdiction until Respondents demonstrate full compliance;

K. **Alternative Relief: Mandate Bond Hearing.** Only if the Court declines to order immediate release, order Respondents to provide Petitioner with a bond hearing before an Immigration Judge with jurisdiction within seven (7) days, at which the Government bears the burden of proving by clear and convincing evidence that Petitioner is dangerous or a flight risk, and at which the Immigration Judge must consider alternative conditions of release; and

L. **Grant All Other Just Relief.** Grant such other relief as the Court deems just and proper.

Dated: July 27, 2026

Respectfully submitted,

/S/ Christiam Contreras

Christiam José Contreras Rodríguez
Country of Birth: Venezuela
A-Number: [redacted]
Current Detention Facility: STEWART DETENTION CENTER
146 CCA Road, Lumpkin, Georgia 31815
Visitor Information: (229) 838-5000
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