

FILED - USDC - FL MD - FTM  
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AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

# UNITED STATES DISTRICT COURT

for the  
Middle District of Florida

Alfredo, Jorge Juarez

*Petitioner*

v.

Officer Josil, Deportation Officer, Miami Field Office and  
Warden of Glades County Detention Center.

*Respondent*

(name of warden or authorized person having custody of petitioner)

Case No. **2:25-CN-610-SPC-KCD**  
(Supplied by Clerk of Court)

## PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

### Personal Information

1. (a) Your full name: **Alfredo, Jorge Juarez**  
(b) Other names you have used: **N/A**
2. Place of confinement:  
(a) Name of institution: **Glades County Detention Center**  
(b) Address: **1297 FL-78, Moore Haven, FL 33471**  
(c) Your identification number: **A# [REDACTED]**
3. Are you currently being held on orders by:  
☐ Federal authorities ☒ State authorities ☐ Other - explain:
4. Are you currently:  
☐ A pretrial detainee (waiting for trial on criminal charges)  
☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime  
If you are currently serving a sentence, provide:  
(a) Name and location of court that sentenced you:  
(b) Docket number of criminal case:  
(c) Date of sentencing:  
☒ Being held on an immigration charge  
☐ Other (explain): **Held by ICE in Civil Immigration detention, pending Removal Proceedings.**

AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

**Decision or Action You Are Challenging**

5. What are you challenging in this petition:
- ☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)
  - ☐ Pretrial detention
  - ☒ Immigration detention
  - ☐ Detainer
  - ☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
  - ☐ Disciplinary proceedings
  - ☐ Other (explain): See, the attach documents
6. Provide more information about the decision or action you are challenging:
- (a) Name and location of the agency or court: ICE – Miami Field Office 865 SW 78th Avenue, Suite 101 Plantation FL 33324 and Glades County Detention Center 1297 E SR 78 Moore Haven, FL 33471
  - (b) Docket number, case number, or opinion number: No Docket Number Assigned.
  - (c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):  
ICE has failed to provide a bond hearing or bring me before an immigration judge, violating due process.
  - (d) Date of the decision or action: 06/04/2025

**Your Earlier Challenges of the Decision or Action**

7. **First appeal**
- Did you appeal the decision, file a grievance, or seek an administrative remedy?
- ☐ Yes ☒ No
- (a) If "Yes," provide:
- (1) Name of the authority, agency, or court:
  - (2) Date of filing:
  - (3) Docket number, case number, or opinion number:
  - (4) Result:
  - (5) Date of result:
  - (6) Issues raised:

AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

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(b) If you answered "No," explain why you did not appeal: There was no final decision to appeal.  
There was no final decision to appeal. ICE failed to bring me before an immigration judge and has not provided a  
any hearing or written decision regarding my detention. Therefore, I have not had the opportunity to appeal.

**8. Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☐ Yes ☒ No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court:
- (2) Date of filing:
- (3) Docket number, case number, or opinion number:
- (4) Result:
- (5) Date of result:
- (6) Issues raised:

(b) If you answered "No," explain why you did not file a second appeal: There was no final decision  
to appeal.

**9. Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☐ Yes ☒ No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court:
- (2) Date of filing:
- (3) Docket number, case number, or opinion number:
- (4) Result:
- (5) Date of result:
- (6) Issues raised:

A0 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

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(b) If you answered "No," explain why you did not file a third appeal: **There was no final decision to appeal.**

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes ☒ No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☐ Yes ☐ No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes ☒ No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

- (c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence:

11. Appeals of immigration proceedings

Does this case concern immigration proceedings?

☒ Yes ☐ No

If "Yes," provide:

- (a) Date you were taken into immigration custody: 05/09/2025  
(b) Date of the removal or reinstatement order:  
(c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes ☒ No

If "Yes," provide:

- (1) Date of filing:  
(2) Case number:  
(3) Result:  
(4) Date of result:  
(5) Issues raised:

- (d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes ☒ No

If "Yes," provide:

- (1) Name of court:  
(2) Date of filing:  
(3) Case number:

AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

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- (4) Result:
- (5) Date of result:
- (6) Issues raised:

**12. Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☐ Yes ☒ No

If "Yes," provide:

- (a) Kind of petition, motion, or application:
- (b) Name of the authority, agency, or court:
- (c) Date of filing:
- (d) Docket number, case number, or opinion number:
- (e) Result:
- (f) Date of result:
- (g) Issues raised:

**Grounds for Your Challenge in This Petition**

- 13.** State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground.

**GROUND ONE:** Facts: Petitioner has been detained for a prolonged period without a bond hearing and without a bond hearing and without meaningful judicial review. The government has failed to justify continued detention through individualized assessment, in violation of due process protections guaranteed by the Fifth Amendment of the U.S. Constitution.

AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

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(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

Denied Due Process:

I have been held in ICE custody for weeks without a bond hearing or a court date. I was not brought to my last scheduled hearing, and it was changed to a virtual hearing without notice. I've been left waiting without knowing when I will see a judge. This is unfair and has kept me locked up with no explanation or chance to defend myself.

(b) Did you present Ground One in all appeals that were available to you?

☐ Yes ☒ No

**GROUND TWO:** Petitioner is not subject to mandatory detention, has no criminal convictions, and poses no danger to the community or flight risk. ICE has continued detention without legal justification, violating governing immigration statutes and Supreme Court precedent (*Zadvydas v. Davis*, 533 U.S. 678).

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

No Criminal Record or Danger:

I have no criminal record. I have never been convicted of any crime. I have a long-term partner and family in the U.S. and have never been a danger to the community. Still, I'm being held without any review or explanation of why I must stay in detention.

(b) Did you present Ground Two in all appeals that were available to you?

☐ Yes ☒ No

**GROUND THREE:** Despite repeated efforts, petitioner has not been afforded reasonable access to legal counsel. The detention setting and lack of transportation to court proceedings have made it impossible to obtain representation, thereby undermining petitioner's right to a fair process and access to the courts.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

No Access to a Lawyer:

I have tried to get legal help, but most lawyers refused to take my case because I am detained. A legal representative came to court with a motion, but they were not allowed to speak or help me because they are not accredited yet. I've had no one to help me fight my case.

(b) Did you present Ground Three in all appeals that were available to you?

☐ Yes ☒ No

AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

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**GROUND FOUR:** While in civil custody, petitioner has endured inhumane conditions, extended separation from family, and psychological distress with no clear timeline or resolution. Although this is a civil matter, the punishment of indefinite detention amounts to a violation of the Eighth Amendment's protection from cruel and unusual punishment.

(a) Supporting facts *(Be brief. Do not cite cases or law.):*

Being locked up like this is hurting me. I feel anxious and afraid. I have been sick and don't get proper treatment. My partner is struggling without me. I don't know when this will end, and it's causing emotional damage and suffering to me and my family.

(b) Did you present Ground Four in all appeals that were available to you?

☐ Yes ☒ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

#### **Request for Relief**

15. State exactly what you want the court to do: I respectfully request that the Court order my immediate release from immigration detention under reasonable supervision, including electronic monitoring if necessary, while my T-Visa application is being processed. I am not a danger or flight risk and have strong community ties.

I also request any other relief the Court deems just and proper.



AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

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**Declaration Under Penalty Of Perjury**

If you are incarcerated, on what date did you place this petition in the prison mail system:

07/01/2025

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 07/01/2025

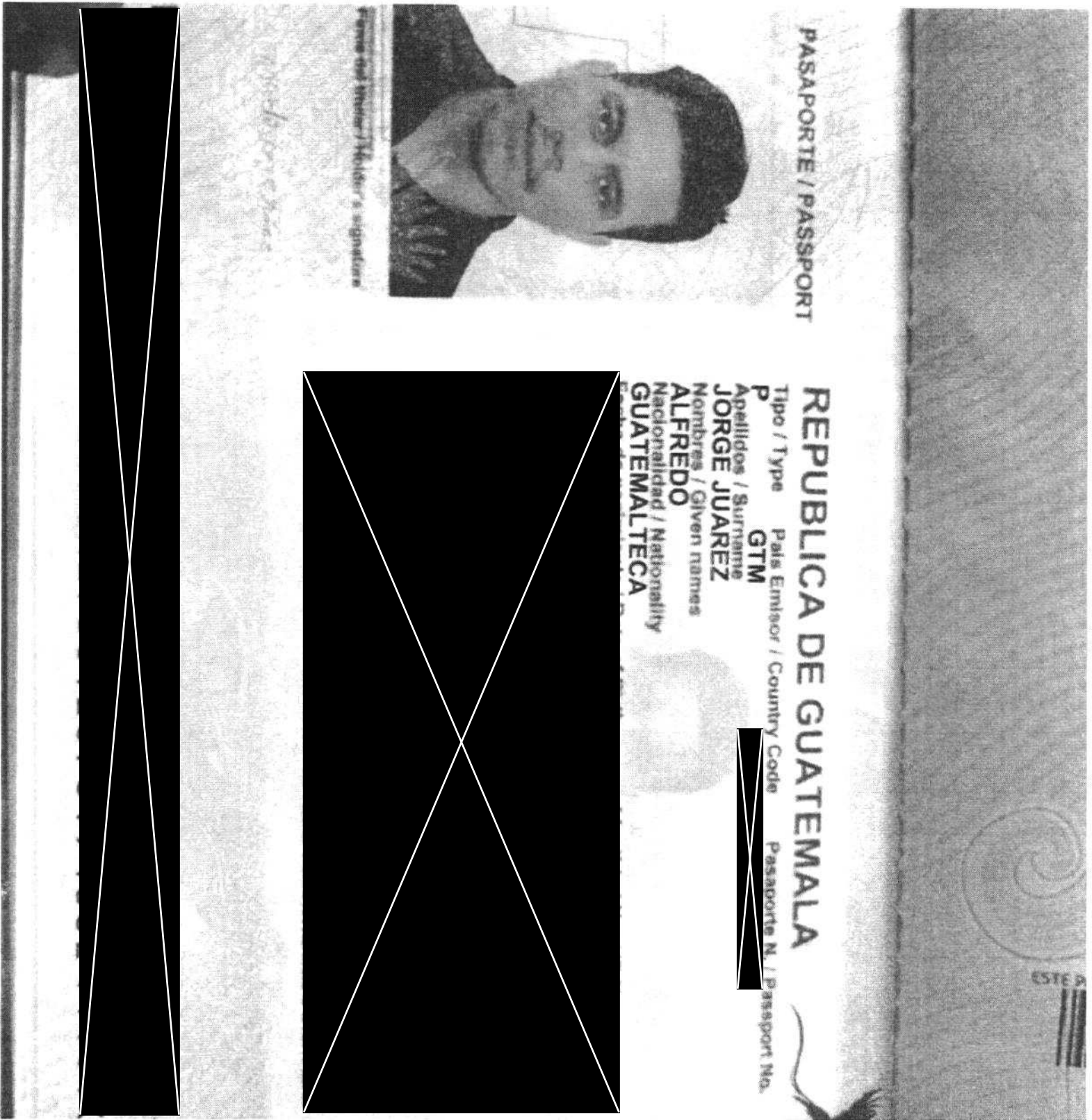
*In Custody.*

*Signature of Petitioner*

*Valery Loeb*

*Signature of Attorney or other authorized person, if any*

FUNDACION PARA LA  
DIGNIDAD DEL INMIGRANTE  
VALERY LOEB  
PARALEGAL / EXC DIRECTOR



Fundación para la Dignidad del Inmigrante  
1386 Rainbow avenue West Palm Beach, FL 33406  
Phone: (850)610-0303  
Email: val@fundignidadinmigrante.com

**07/16/2025**

Clerk of Court  
U.S. District Court  
Middle District of Florida  
2110 First Street  
Fort Myers, FL 33901

**RE: Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241**

Petitioner: Alfredo Jorge Juárez

A# [REDACTED] - Detained at Glades County Detention Center

Dear Clerk of Court,

Please find enclosed a **pro se Petition for Writ of Habeas Corpus** submitted on behalf of **Mr. Alfredo Jorge Juárez**, a detainee currently held at the Glades County Detention Center.

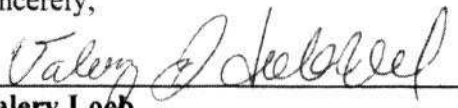
I am a **paralegal and director of Fundación para la Dignidad del Inmigrante**, a nonprofit organization that provides legal support to immigrants in detention. I am currently in the process of obtaining full DOJ accreditation to represent individuals before the Executive Office for

Immigration Review (EOIR). I am not submitting this petition in the capacity of legal counsel or attorney. I have simply facilitated the preparation of this document by transcribing the facts and requests made directly by Mr. Juárez, who is **acting pro se** in asserting his right to judicial review of his ongoing detention. Mr. Juárez is also in the process of preparing an application for **T nonimmigrant status (Visa T)** due to factors related to trafficking and exploitation, and we are actively working on that case as of today.

We respectfully request that this Petition be filed and reviewed by the appropriate judicial officer. Enclosed you will find all relevant supporting documentation, including the petition, exhibits, and a proof of service to the U.S. Attorney's Office.

Please do not hesitate to contact me should you need additional information or clarification.

Sincerely,

  
\_\_\_\_\_  
**Valery Loeb**  
Paralegal, Fundación para la Dignidad del Inmigrante

FUNDACION PARA LA  
DIGNIDAD DEL INMIGRANTE  
VALERY LOEB  
PARALEGAL / EXCDIRECTOR