

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

FILED SEP 15 25 AM 8:10
MDG-CDL

JIDIER ANTONIO SAAVEDRA

DETAINED

A# 

Petitioner,

Case No: 4:25-CV-00244-CDL-CHW

v.

PAM BONDI et al

Attorney General;

WARDEN,

STEWART DETENTION CENTER

Respondents.

**" TRAVERSE IN RESPONSE TO OPPOSITION"
BY DHS/ICE ON HABEAS CORPUS RELIEF**

Petitioner, JIDIER ANTONIO SAAVEDRA, hereby petitions this Court with a "Traverse" due to the opposition by DHS/ICE in granting his Habeas Corpus as untimely and states as follows:

As noted on the face of the record and documents, and Declaration submitted to the Court by Michael P. Morill Assistant U.S. Attorney, Traci Horrach Assistant Field Office Director and DHS, that are contrary to the statements made to this Court. Petitioner re alleges his claim stating that his claim is not premature as he has surpassed the mandatory detention period of 90 days and if taken into account the time he spent detained after his final order of removal dated August 8, 2018 which was appealed and denied/dismissed by the BIA on January 4, 2019. Petitioner remained detained by DHS/ICE the whole time and on August 21, 2019 the BIA granted the Motion to terminate removal proceedings due the petitioner vacating his conviction in criminal court due to ineffective assistance of counsel.

From January 4, 2019 to August 21, 2019 alone is **229 days** which is well over the 180 days to file a Habeas Corpus all of which the petitioner has served detained. From there the Petitioner entered a new plea negotiation with the 15th Judicial Circuit on October 4, 2019 that was supposed to cure any Immigration/deportation matter, but ultimately still had deportation consequences unknown to the Petitioner or the State Attorney handling the Criminal conviction/case.

Upon accepting the new charges that were restructured for Immigration matters the Petitioner

was transferred back to face DHS/ICE yet again at K.R.O.M.E. S.P.C. located in Miami Florida.

While at KROME S.P.C. On January 9, 2020 the Petitioner appeared in Immigration Court before Honorable Judge Jorge Pereira for a Plea agreement/individual Merits hearing where it was agreed by all parties that if the Petitioner agreed to be removed on paper, but not actually removed to Cuba he would be allowed to Re-open his Immigration Case at any time from outside with-out any objection from anyone and he would be released within 10 days, following an expedited order signed from the Judge issued to Petitioners Deportation Officer on that day. The deportation officer gave his word to Judge Jorge Pereira and to Petitioner that he would release the petitioner in 10 days if the Judge signed the expedited order and if the Petitioner agreed to withdrawing all forms of relief until he was released.

If this Court is to take into account the 12 days from January 9, 2020 to the day he was released on January 21, 2020 he would have 241 days detained by DHS/ICE not to mention the time he is doing now. Also contrary to the statement made by DHS/ICE Petitioner was encountered by DHS/ICE on March 7, 2025 and not on March 17, 2025

(See Exhibit A) Traffic Summons by the Coweta County Sheriff's Office. Dated 3-7-2025

(See Exhibit B) Form issued to Dept of Motor Vehicles Dated 3-7-2025

(See Exhibit C) Notice to Detainee by DHS/ICE form I-247 A Dated 3-8-2025

Petitioner was then transferred to Robert A. Deyton Detention Facility and processed on 3-14-2025 and all of this time is in the custody of DHS/ICE **(See Exhibit D)** Dated 3-14-2025 from there the Petitioner was yet again transferred to 180 Ted Turner Dr. SW Atlanta, GA 30303 and then finally transferred to his final Detention facility of Stewart Detention Center on 3-17-2025. **(See Exhibit E)**

Petitioner just had his 180 day Custody review on September 4, 2025 (See Exhibit F) detained which clearly places him over the time to seek relief in addition to the 241 additional days he has served detained previously, after a final order of removal has been issued and finalized.

If the Courts were to add all the dates together that the Petitioner has been detained after a final order by DHS/ICE it would total **421 days** as of this date of **September 5, 2025** which is also the Petitioner's Daughter's Birth-date that he is missing due to this detention period.

Petitioner remains detained in DHS/ICE custody, and has been confined for a period far longer than the law mandates. Which even stated by the documents submitted by DHS/ICE that he is allowed

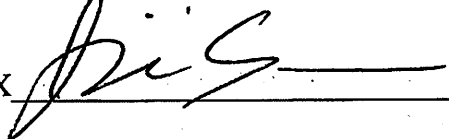
to re-open his Immigration case from outside at any time UN-opposed by any party, which clearly the Petitioner seeks to do along with his U-Visa Petitions, and VAWA that are signed by several police Officers, as he is the Victim of 5 different crimes in the United States, such as Armed robbery, Kidnapping, Assault with a deadly weapon, Domestic Violence, and Aggravated Assault during the 46 years he has lived in the United States of America.

In addition to the time that the Petitioner has served detained to file his Habeas Corpus petition, the Petitioner points out to Honorable Judge Charles H. Weigle and this Court, that DHS was given ample time to file a comprehensive reply but failed to do so as the first date to file was given then extended to 21 days. Respondent(s) filed an unsigned copy of the Declaration of Assistant Field Office Director Traci Horrach on the last date authorized by this Court. To be a valid legal document "**it must be signed**", and in this case it clearly was not and reflected by the record. There were avenues such as a Motion for extension of time, but failed to do so. It was not until 3 days after the expiration date that a signed Declaration was submitted to the Courts. Even so the signed document was that of an electronic signature and not an actual handwritten signature by Ms. Traci Horrach. This electronic signature could have been provided well before the deadline given to the respondent(s), and not after the deadline to make the document valid.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

1. Plaintiff respectfully request this Court to deny the documents submitted against him as null and void, for being untimely filed and not legally signed .
2. Grant the Petitioner's Habeas Corpus directing the respondent to immediately release petitioner from custody, under reasonable conditions of supervision;
3. Order respondents to refrain from transferring the petitioner out of the jurisdiction of the ICE Director's Jurisdiction for the Middle district of Georgia while the petitioner remains in the Respondent's custody; and
4. Grant any other form of relief this court deems just and proper.

X 

September 5-2025

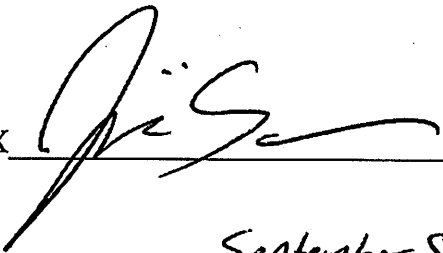
JIDIER ANTONIO SAAVEDRA

CERTIFICATE OF OATH

I Swear under Penalty of Perjury from The United States of America if this Motion is found to be false, frivolous or made in bad faith. I also swear that this motion is true to the best of my knowledge.

I further state that this motion is not a copy of a Motion that has already been ruled on nor has it been deposed of by this Court.

I swear that this Motion has been prepared by me Jidier Saavedra and that I understand everything that is said in the following motion and everything is true.

X 

September 5 -2025

JIDIER ANTONIO SAAVEDRA

DETAINED

A#



Stewart Detention Center

146 CCA Rd

Lumpkin, GA 31815

CERTIFICATE OF SERVICE

I Swear that a true and correct copy of the following Motion has been placed in the hands of an institution official or has been placed in the Mail-room official's hand at Stewart detention Center located at 146 CCA Rd. Lumpkin, Georgia 31815 to be mailed by first class mail to be furnished and forwarded to the following parties listed below.

on September 5-2025

1. United States District Court
For the Middle District of Georgia
Columbus Division
P.O. Box 124
Columbus, GA 31902

7. DHS/ICE Supervisor
KROME S.P.C.
18201 SW 12th Street
Miami, FL 33194

2. Department of Homeland Security/ICE
Stewart Detention Center
P.O. Box 248.
Lumpkin, GA 31815

3. H.Q.P.D.U.
500 12th Street SW
Washington, DC 20536

4. Homer Bryson
1208 Green Belt Drive
Griffin, GA 30224

5. Honorable Immigration Judge
Jorge Pereira
Immigration Court
KROME S.P.C.

18201 SW 12th Street
Miami, FL 33194

6. Office of Chief Counsel/
KROME S.P.C.
18201 SW 12th Street
Miami, FL 33194

X 

September 5-2025

JIDIER ANTONIO SAAVEDRA

DETAINED

A#



Stewart Detention Center

146 CCA Rd

Lumpkin, GA 31815



U.S. Immigration
and Customs
Enforcement

DETAINEE TRANSFER NOTIFICATION

This Form To Be Completed And Given To The Detainee

DETAINEE NAME: Saavedra, Jidier A

A#



NATIONALITY: CUBA

TRANSFER INFORMATION

NAME OF NEW FACILITY: Stewart Detention Center

ADDRESS OF NEW FACILITY: 146 CCA Rd
Lumpkin, Georgia 31815

TELEPHONE NUMBER
OF NEW FACILITY: 229-838-5000

I hereby acknowledge that I have received the transfer information. I have also been notified that it is my responsibility to notify family members or others, if I so desire.

Detainee Signature: _____

A# 035 415 659

Date: 03/17/25

Officer Signature: *R. McLean*

Date: 03/17/25

Currency inventoried and returned to subject: \$ _____

(Exhibit E)

X _____

U.S. Department of Homeland Security
U.S. Department of Homeland Security
1000 E. Adams Street, SW
Washington, DC 20540



U.S. Immigration
and Customs
Enforcement

Saavedra, Jidier A
146 Cca Rd Lumpkin, GA 31815



Notice to Alien of Interview for Review of Custody Status

U.S. Immigration and Customs Enforcement (ICE) periodically reviews the custody status of detained aliens who have final orders of removal, deportation, or exclusion. You are required to cooperate with ICE in effecting your removal from the United States.

In determining whether you may be recommended for release, ICE will consider whether there is a significant likelihood of your removal in the reasonably foreseeable future, and whether you pose a danger to the community or pose a risk of flight.

You will be interviewed for this purpose and you are scheduled to appear for this interview on:

09/05/2025 at: 10:00 AM . at Stewart Detention Center

to discuss whether or not you will be recommended for release. If you wish for additional time to prepare for the interview, you may request that the interview date be postponed. If the hearing is rescheduled at your request, you waive the right to have the interview prior to the date that jurisdiction over your custody status shifts to the Enforcement and Removal Operations Removal Division under 8 C.F.R. § 241.4(c)(2).

In determining whether you may be released, ICE may consider, but is not limited to considering the following:

1. Whether your removal is significantly likely in the reasonably foreseeable future;
2. Criminal convictions and criminal conduct;
3. Other criminal history and immigration history;
4. Sentence(s) imposed and time actually served;
5. History of escapes, failures to appear for judicial or other proceedings, and other defaults;
6. Probation history;
7. Disciplinary problems while incarcerated;
8. Evidence of rehabilitative effort or recidivism;
9. Equities in the United States;
10. Cooperation in obtaining your travel document; and
11. Any available mental health reports.

You are required to complete the information on the following page. You will be notified of the decision in your case when the custody review has been concluded.

(Exhibit F)

Saavedra, Jidier A

A 035-415-659

I do ☒ do not ☐ want a personal interview.

If you want an interview, please check the appropriate box(es) below:

☐ Check this box if you need an interpreter for your interview.

Language/Dialect: _____

☐ I will be assisted at this interview by a representative of my own choosing.

Name: _____

I understand I must notify this person of the time and place of my interview. The representative must be at least 18 years of age.

You may submit any additional documentation you wish to be considered in support of your release at the time of your interview. English translations must be provided pursuant to 8 C.F.R. § 103.2(b)(3).

Signature of Respondent: _____

PROOF OF SERVICE

(Officer to complete both (a) and (b) below.)

(a) I, M. Guerra, Deportation Officer,
Name of ICE Officer Title

certify that I served Saavedra, Jidier A with a copy of
Name of detainee

this document at Stewart Detention Center on 09/04/2025 at 09:00 AM.
Institution Date Time

(b) I certify that I served the custodian _____,
Name of Official

_____, at _____, on
Title Institution

_____ with a copy of this document.
Date

- ☐ cc: Attorney of Record or Designated Representative
☐ cc: A-File

(Exhibit F)

Jidier Saavedra

A#

Stewart Detention Center

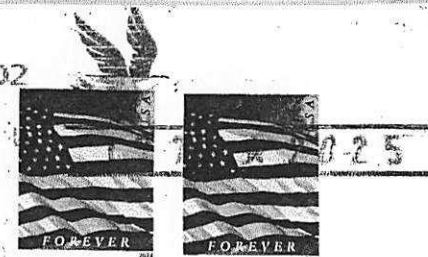
146 CCA Rd

Lumpkin, GA 31815

ATLANTA GA RPDG 302

11 SEP 2025 PM 2

SEP 10 2025



United States District Court
For the Middle District of Georgia
Columbus Division
P.O. BOX 124
Columbus, GA 31902

31902-012424

* Legal Mail *