

Juan Carlos Perez-Morodo Att [REDACTED]

Name and Prisoner Number/Alien Registration Number

Eloy Detention Center

Place of Confinement

1705 E Hanna RD

Mailing Address

Eloy AZ 85131

City, State, Zip Code

(Failure to notify the Court of your change of address may result in dismissal of this action.)

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| SEP 10 2025 | | |
| CLERK U.S. DISTRICT COURT | | |
| DISTRICT OF ARIZONA | | |
| BY DEPUTY | | |

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

Juan Carlos Perez Morodo

(Full Name of Petitioner)

Petitioner,

v.

F. E. Figueroa

(Name of Warden, Jailor or authorized person
having custody of Petitioner)

Respondent.

CASE NO. CV25-03298-PHX-JAT--JZB

(To be supplied by the Clerk)

PETITION UNDER 28 U.S.C. § 2241
FOR A WRIT OF HABEAS CORPUS
BY A PERSON IN FEDERAL CUSTODY

PETITION

1. What are you challenging in this petition?

Immigration detention
 Bureau of Prisons sentence calculation or loss of good-time credits
 Probation, parole or supervised release
 Other (explain): _____

2. (a) Name and location of the agency or court that made the decision you are challenging: _____

Phoenix, Arizona

(b) Case or opinion number: Unknown

(c) Decision made by the agency or court: Deportation

(d) Date of the decision: 2009

3. Did you appeal the decision to a higher agency or court? Yes No

If yes, answer the following:

(a) First appeal:

- (1) Name of the agency or court: _____
- (2) Date you filed: _____
- (3) Opinion or case number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.

(b) Second appeal:

- (1) Name of the agency or court: _____
- (2) Date you filed: _____
- (3) Opinion or case number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.

(c) Third appeal:

- (1) Name of the agency or court: _____
- (2) Date you filed: _____
- (3) Opinion or case number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.

4. If you did not appeal the decision to a higher agency or court, explain why you did not: I did not follow up the appeal because i was admitted by the Department of Homeland Security under a Supervised Probation. They even gave a work Permit that still good on date

5. Other than the appeals listed above, have you filed any other petitions, applications or motions concerning the issues raised in this petition? Yes No

If yes, answer the following:

(a) Name of the agency or court: _____

(b) Date you filed: _____

(c) Opinion or case number: _____

(d) Result: _____

(e) Date of result: _____

(f) Issues raised: _____

Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.

6. For this petition, state every ground on which you 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.

CAUTION: To proceed in the federal court, you must ordinarily first exhaust (use up) your available administrative remedies on each ground on which you request action by the federal court.

GROUND ONE: I have been under Federal custody by ICE for more than 6 six months and i don't see myself being released any time soon and another point is that my country is not accepting deportations

(a) Supporting FACTS (Do not argue or cite law. Just state the specific facts that support your claim):
I have gone my 180 days review and i was told im gonna be under custody. Because they say i would be remove sometime in the future. it has now been long after the fact and Im still under ICE custody. I have been helped them in what they ask from me and now it is up to them to released me from ICE custody. It is clear now that ICE has no intentions on releasing me in any time soon

(b) Did you exhaust all available administrative remedies relating to Ground One? Yes No

(c) If yes, did you present the issue to:

- The Board of Immigration Appeals
- The Office of General Counsel
- The Parole Commission
- Other: ICE

(d) If you did not exhaust all available administrative remedies relating to Ground One, explain why:

GROUND TWO: _____

(a) Supporting FACTS (Do not argue or cite law. Just state the specific facts that support your claim.):

(b) Did you exhaust all available administrative remedies relating to Ground Two? Yes No

(c) If yes, did you present the issue to:

- The Board of Immigration Appeals
- The Office of General Counsel
- The Parole Commission
- Other:

(d) If you did not exhaust all available administrative remedies relating to Ground Two, explain why:

GROUND THREE:

(a) Supporting FACTS (Do not argue or cite law. Just state the specific facts that support your claim.):

(b) Did you exhaust all available administrative remedies relating to Ground Three? Yes No

(c) If yes, did you present the issue to:

- The Board of Immigration Appeals
- The Office of General Counsel
- The Parole Commission
- Other: _____

(d) If you did not exhaust all available administrative remedies relating to Ground Three, explain why:

GROUND FOUR: _____

(a) Supporting FACTS (Do not argue or cite law. Just state the specific facts that support your claim.):

(b) Did you exhaust all available administrative remedies relating to Ground Four? Yes No

(c) If yes, did you present the issue to:

- The Board of Immigration Appeals
- The Office of General Counsel
- The Parole Commission
- Other:

(d) If you did not exhaust all available administrative remedies relating to Ground Four, explain why:

Please answer these additional questions about this petition:

7. Are you challenging your conviction or sentence in any of the grounds raised above? Yes No
(Claims challenging a federal conviction or sentence may only be raised in a motion under 28 U.S.C. § 2255, unless the § 2255 motion is legally inadequate or ineffective.)

If yes, answer the following:

(a) Have you filed a motion under 28 U.S.C. § 2255? Yes No

If yes, answer the following:

(1) Name of court: _____

(2) Case number: _____

(3) Opinion or case number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.

(b) Explain why the remedy under § 2255 is inadequate or ineffective: _____

8. If this case concerns immigration removal proceedings, answer the following:

(a) Date you were taken into immigration custody: 02/21/25

(b) Date of removal or reinstatement order: 2009

(c) Did you file an appeal with the Board of Immigration Appeals? Yes No

(1) Date you filed: _____

(2) Case number: _____

(3) Result: _____

(4) Date of result: _____

(5) Issues raised: _____

Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.

(d) Did you file an appeal with the federal court of appeals? Yes No

(1) Name of the court: _____

(2) Date you filed: _____

(3) Case number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.

9. Petitioner asks that the Court grant the following relief: i ask to be released under supervised probation since there is no time soon in which I am going to be release

or any other relief to which Petitioner may be entitled. (Money damages are not available in habeas corpus cases.)

I declare under penalty of perjury that the foregoing is true and correct and that this Petition for Writ of Habeas Corpus was placed in the prison mailing system on _____ (month, day, year).

DCM
Signature of Petitioner

Signature of attorney, if any

8/25/2025
Date

CERTIFICATE OF SERVICE

Name: Juan Carlos Perez Morodo A Number: A 
(Nombre) (Número de Caso A)

I hereby certify that on the date indicated below copies of the attached were delivered to the United States Immigration Court and to Immigration and Customs Enforcement (ICE) in separate envelopes by placing those envelopes into intra-facility mail.

Por medio de la siguiente yo certifico que las copias de lo adjunto fueron entregadas al Tribunal de Inmigración de los Estados Unidos y Control de Aduanas e Inmigración (ICE) en la fecha indicada abajo, en sobres separados, y al colocar los sobres dentro del correo interno.

Date: 8/25/2025
(Fecha)

Signature: 
(Firma)

CERTIFICATE OF SERVICE

Name: Juan Carlos Perez Morodo A Number: A 
(Nombre) (Número de Caso A)

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Date: 8/25/2025
(Fecha)

Signature:
(Firma)



Request for Release from Detention

Name: Perez-Morodo
LastJoan
FirstC
MiddleAlien Number: A Detention Location: 1705 E Hanna Rd
Eloy, AZ 85131

Immigration and Naturalization Service:

Pursuant to interpretation of the opinion of the Supreme Court of the United States of America in the case Zadvydas v. Davis, I request release from the custody of the Attorney General, in that I have been ordered removed/deported from the United States by an Immigration Judge [or in another lawful manner], but due to circumstances beyond my control, my removal/deportation cannot be effected in the reasonable foreseeable future, due to an absence of a formal repatriation agreement between my country of citizenship and the United States, or due to the fact that my country of citizenship has not or will not issue identity and travel documents necessary for my departure.

The Following additional information is provided:

1. I am a citizen of: Cuba
Country of Citizenship2. I have not applied for a travel document.
Date request submitted _____

3. My birth certificate and passport [valid or expired] are in the possession of:

N/A N/A
Name Adress

N/A

Phone Number

4. If released from custody, I plan to reside at the following location:

3538 W Cheery Lynn Rd. PHX. AZ. 85019
Address

Under Penalty of law, I certify that the foregoing information provided by herein is true.

Perez Morodo Joan C
Last Name First Name Middle Name

ACDM
Signature

8/25/2025
Date