

FELIX FERNANDO MARTINEZ RICO,

vs.

Case No.: 25-990-BAJ-RLB

U.S. IMMIGRATION & CUSTOMS ENFORCEMENT;
KEVIN JORDAN; PAMELA BONDI.

REPLY TO RESPONDENT'S RESPONSE TO PETITION FOR WRIT OF
HABEAS CORPUS

Comes Now the Petitioner, Felix Fernando Martinez Rico, prose, pursuant to applicable rules of court, respectfully Replies to Respondents' Response to Petition for Writ of Habeas Corpus. In support, states as follows:

Respondents argue that Petitioner's assertion that Petitioner's removal is unlikely in the reasonably foreseeable future, "do not provide any substantive basis" (Response at ps 3).

Petitioner submits that he has now been in ICE custody for going on 6 months and has yet to be removed. The record speaks for itself. Petitioner submits that he is ~~prematured~~ not prematured in his filing for relief. Immigration has had since 1999 to remove Petitioner. However has not been able to. The record clearly shows that nothing new exists that would indicate that Petitioner will be removed in the near future.

Petitioner respectfully submits that the record shows that after approximately 25 years is ~~prove~~ proof that there is no significant likelihood of removal in the reasonably foreseeable future. Petitioner further submits that this is not speculation or conclusory. The facts speak for the Petitioner. Even the recent steps taken by ICE further show that there is no significant likelihood of removal in the foreseeable near future. Petitioner respectfully argues that the Respondent's claim that they are looking to identify a third country which will accept Petitioner, is really speculative. They fail to name what third country they are in contact with. They have already attempted Cuba and a third country Mexico without any success. Petitioner submits that there is no other third country that will accept Petitioner.

Petitioner has met his burden, it's the Respondents who are failing to meet their burden as per Zadvydas.

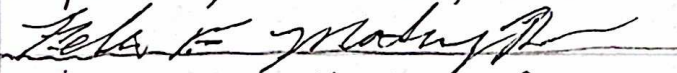
Respondents argue that Petitioner is a risk of danger to the community.

Petitioner, respectfully argues to the contrary. The record again will prove otherwise. ICE has already determined Petitioner was not a risk of danger to the community back in 2019

when Petitioner was released on an Order of Supervision. Petitioner has been reporting as required by the conditions of his Supervision since 2019 without any problem what-so-ever. There has been no new information that would indicate that ICE original decision to place Petitioner on supervision should be reversed.

Wherefore, Petitioner respectfully requests this Honorable Court grant his prose Petition for Writ of Habeas Corpus pursuant to 28 USC § 2241 and further order Petitioner's immediate release from ICE custody and be reinstated back under Supervision.

Respectfully submitted,



Felix Fernando Martinez Rico

Alien # A 

ICE Processing Center

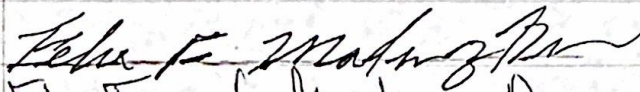
Camp 51

17544 Tunica Trace

Angola, La 70712

CERTIFICATE OF SERVICE

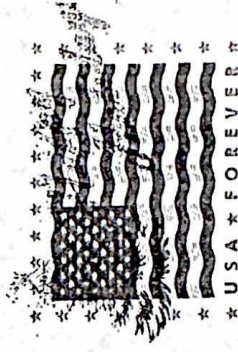
I hereby certify that a copy of the foregoing Reply to Respondent's Response to Petition for Writ of Habeas Corpus was mailed by U.S. Postal Service to U.S. Attorney at U.S. Attorney Office, 451 Florida Street, Suite 300, Baton Rouge, La. 70801-1734 on 16 day of December, 2025 by placing in the hands of Camp 57 prison officials for mailing.


Felix Fernando Martinez Rico
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U.S. District Court
Middle District of Louisiana
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