

UNI ED S A ESDIS RIC C UR  
MIDD E DIS RIC RIDA  
. M ERS DIVISI N

*Pa lo Alejandro amora Mejia,*

Petitioner,

v.

Case No.:

*Kristi Noem*, Secretary of the Department of Homeland Security; *Pamela Bondi*, Attorney General of the U.S.; *odd M. yons*, Acting Director U.S. Immigration and Customs Enforcement; *Garrett Ripa*, ICE ERO Miami Field Office Director; and, *Kevin Guthrie*, Executive Director of the Florida Division of Emergency Management,

Respondents.

EMERGENC PE I I N R RI HABEASC RPUS  
PURSUAN U.S.C. AND R IMMEDIA ERE EASE R, IN HE  
A ERNA IVE, A PR MP INDIVIDUA I EDB ND HEARING

To the Honorable Judge of Said Court:

I. IN R DUC I N

1. Petitioner, Pablo Alejandro Zamora Mejia (hereinafter “Mr. Zamora Mejia”), seeks a writ of habeas corpus to remedy his unlawful detention by the Respondents. Mr. Zamora Mejia, who remains in lawful temporary protected status (TPS) under 8 U.S.C. § 1254a, is being unlawfully detained by Respondents without Respondents providing any legal justification for his ongoing detention and without the commencement of any proceedings against him, and in flagrant violation of 8 U.S.C. § 1254a(d)(4).

2. Mr. Zamora Mejia, a 46-year-old Venezuelan national, entered the United States (hereinafter “US”) lawfully on a B-2 visa for pleasure, on April 5, 2018. Fearing persecution in Venezuela, he sought asylum protection in the US. *See generally*, 8 U.S.C. § 1158. His application

for asylum remains pending with US Citizenship and Immigration Services (hereinafter “USCIS”). Mr. Zamora Mejia also sought and received Temporary Protected Status (hereinafter “TPS”) under 8 U.S.C. § 1254a with USCIS. Mr. Zamora Mejia remains in valid TPS status until November 7, 2025. *See* 90 FR 43225.

3. On October 17, 2025, Mr. Zamora Mejia was arrested for the first time in his life at 46 years of age and charged with driving under the influence. There was no alleged harm to persons or property, and Mr. Zamora Mejia was set for release when his family paid a state bond amount of \$1150. Before he was released from state custody, Mr. Zamora Mejia was transferred to a detention facility inside the Big Cypress National Preserve, named Alligator Alcatraz (hereinafter, “the detention center”), run by the State of Florida Division of Emergency Management (hereinafter “FL Emergency Mgmt”) and under the supervision/control of the US Department of Homeland Security (hereinafter “DHS” or “the Department”) and the US Immigration and Customs Enforcement (hereinafter “ICE”). The unproven criminal allegations against Mr. Zamora Mejia remain pending.

4. Mr. Zamora Mejia’s detention is patently unlawful and in direct violation of 8 U.S.C. § 1254a(d)(4), which states that “[a]n alien provided temporary protected status under this section shall not be detained by the Attorney General on the basis of the alien's immigration status in the United States.” Respondents are unlawfully detaining Mr. Zamora Mejia without providing a legal justification for his ongoing detention, while not so subtly awaiting for his lawful status to lapse on November 7, 2025, to legitimize his detention. *See* 90 FR 43225

5. Mr. Zamora Mejia respectfully requests that this Honorable Court enjoin respondents from transferring Mr. Zamora Mejia outside of the court’s jurisdiction.

6. Moreover, Mr. Zamora Mejia respectfully requests that this Honorable Court order Respondents to show cause why the writ should not be granted within three days and, if necessary, set a hearing on this Petition within 2 days of the return, pursuant to 28 U.S.C. § 2243.

7. Mr. Zamora Mejia further respectfully requests that this Honorable Court grant him a writ of habeas corpus, ordering Respondents to release him immediately.

## *II. PAR IES*

8. Petitioner, Pablo Alejandro Zamora Mejia, is a 46-year-old native and citizen of Venezuela who entered the US lawfully on a B-2 visa for pleasure, on April 5, 2018. He is being detained without a bond by Respondents at the detention center in Florida.

9. Respondent, Kristi Noem, is the Secretary of DHS, which is responsible for the administration of ICE, a subunit of DHS, and the implementation and enforcement of the immigration laws. As such, Ms. Noem is the ultimate legal custodian of Mr. Zamora Mejia. This Respondent is being sued in her official capacity.

10. Respondent, Pamela Bondi, is the Attorney General of the United States and head of the Department of Justice, which encompasses the Board of Immigration Appeals (hereinafter “BIA”) and the Immigration Courts. Ms. Bondi shares responsibility for implementation and enforcement of the immigration laws with Respondent Noem. As such, Ms. Bondi is a legal custodian of Mr. Zamora Mejia. This Respondent is being sued in her official capacity.

11. Respondent, Todd M. Lyons, is the Acting Director of ICE. He is responsible for the administration of ICE and the implementation and enforcement of the immigration laws, including noncitizen detention. As such, he is a legal custodian of Mr. Zamora Mejia. This Respondent is being sued in his official capacity.

12. Respondent, Garrett Ripa, is the ICE Field Office Director for the Miami Field Office. The Miami Field Office is responsible for the detention of noncitizens in Florida and at the detention center where Mr. Zamora Mejia is being detained. This Respondent also effects operational, legal, and factual control over the detention center and, as such, is a legal custodian of Mr. Zamora Mejia. This Respondent is being sued in his official capacity.

13. Respondent Kevin Guthrie, is the Executive Director of FL Emergency Mgmt., which manages the detention center where Mr. Zamora Mejia is being detained. As such, he is a legal custodian of Mr. Zamora Mejia. This Respondent is being sued in his official capacity.

### *III. JURISDICTION AND VENUE*

14. This Court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 1651 (All Writs Act), 28 U.S.C. §§ 2201-02 (declaratory relief), and Art. I, Sec. 9, Cl. 2 of the United States Constitution (Suspension Clause), as Mr. Zamora Mejia is presently in custody under, or by color of, the authority of the US and challenges his custody as in violation of the Constitution, laws, or treaties of the US.

15. The federal district courts have jurisdiction under Section 2241 to hear habeas claims by individuals challenging the lawfulness of their detention by ICE. *See, e.g., Demore v. Kim*, 538 U.S. 510 (2003); *Zadvydas v. Davis*, 533 U.S. 678 (2001). The Supreme Court upheld the federal courts' jurisdiction to review such claims in *Jennings v. Rodriguez*, 583 U.S. 281, 291-295 (2018).

16. Venue is proper in the Middle District of Florida pursuant to 28 U.S.C. §§ 1391 and 2241(d) because Mr. Zamora Mejia is detained at the detention center in or near Ochopee, Florida, within the court's jurisdiction.

### *IV. EXHAUSTION OF ADMINISTRATIVE REMEDIES*

17. Mr. Zamora Mejia has no administrative remedies available to him and his only remedy is by way of this judicial action.

18. Further, no statutory exhaustion requirements apply to Mr. Zamora Mejia's claim of unlawful detention. This petition raises a constitutional law issue, and the administrative agency will not address the constitutional issue. Likewise, the agency is unable to strike down its own regulation as in violation of the statute. *See Matter of G-K-*, 26 I&N Dec. 88 (BIA 2013).

*V. EGA RAME RK*

19. Noncitizens who enter the US are entitled to due process under the Fifth Amendment to the US Constitution. *Reno v. Flores*, 507 U.S. 292, 306 (1993).

20. An individual's detention by immigration authorities must be lawful, based on statutory authority, and supported by specific charges alleging the person's unlawful presence or inadmissibility in the United States. Furthermore, the government may not deprive a noncitizen of liberty without a valid legal basis or proper notice of the grounds for detention. *See generally, Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

21. Immigration detention is a form of civil confinement that "constitutes a significant deprivation of liberty that requires due process protection." *Addington v. Texas*, 441 U.S. 418, 425 (1979).

*VI. AC SANDPR CEDURA HIS R*

22. Mr. Zamora Mejia, is a 46-year-old Venezuelan national who entered the US lawfully on a B-2 visa for pleasure, on April 5, 2018. *E hi it A.*

23. Fearing persecution in Venezuela, he sought asylum protection by filing Form I-589, Application for Asylum and Withholding of Removal, on April 5, 2019. His application for asylum remains pending. *E hi it B.*

24. On March 9, 2001, the Department of Homeland Security (DHS) designated Venezuela for Temporary Protected Status under 8 U.S.C. § 1254a, 86 FR 13574. Mr. Zamora Mejia promptly applied and remained in TPS status until September 10, 2025. *E hi it C.*

25. On September 8, 2025, DHS terminated TPS for Venezuela, making the termination effective on November 7, 2025. 90 FR 43225.

26. On October 17, 2025, Mr. Zamora Mejia was arrested for the first time in his life at 46 years of age and charged with driving under the influence. *E hi it D.* There was no alleged harm

to persons or property, and Mr. Zamora Mejia was set for release when his family paid a state bond amount of \$1150. Before he was released from state custody, Mr. Zamora Mejia was transferred to a detention facility inside the Big Cypress National Preserve, named Alligator Alcatraz (hereinafter, “the detention center”), run by the FL Emergency Mgmt. and under the supervision/control of DHS and ICE. The unproven criminal allegations against Mr. Zamora Mejia remain pending.

27. On October 23, 2025, the undersigned counsel inquired about the legal grounds for Mr. Zamora Mejia’s detention. The government replied that it determined Mr. Mejia’s TPS status had lapsed on September 10, 2025.

28. On October 27, 2025, the undersigned counsel inquired on the government’s interpretation and import of the federal register notice published on September 8, 2025. 90 FR 43225. However, to this date, no response has been provided. *E hi it E.*

29. Upon information and belief, Mr. Zamora Mejia remains at the detention center. *E hi it*.

30. As of the date of this filing, Mr. Zamora Mejia has not been served with a Notice to Appear (hereinafter “NTA”) and removal proceedings have not been commenced against him. If and when removal proceedings against him are commenced, he is ready to participate in the proceedings and submit himself to the immigration court’s jurisdiction. Mr. Zamora Mejia appears eligible for asylum.

31. Mr. Zamora Mejia challenges Respondent’s constitutional and statutory authority to detain him, where Respondents have presented no legal justification for his ongoing detention. To the contrary, it is clear that the government is violating Mr. Zamora Mejia’s rights while waiting out the clock until his TPS status expires on November 7, 2025.

32. Respondents have deprived Mr. Zamora Mejia of procedural and substantive due

process, and acted contrary to established law in an arbitrary and capricious manner. *See Jennings*, 583 U.S. at 291-298; *Id.* at 355-356 (Breyer, J., dissenting); *Zadvydas*, 533 U.S. at 688 (Explaining the court’s authority to consider a habeas challenge to detention that is without statutory authority notwithstanding Congress’ attempt to limit judicial review in immigration matters).

## VII. CAUSES AC I N

### Count Unlawful Restraint Detention in Violation of Constitutional Due Pro ess

33. Mr. Zamora Mejia re-alleges and incorporates the preceding paragraphs.

34. The Due Process Clause of the Fifth Amendment forbids the government from depriving any person of liberty without due process of law. U.S. Const. Amend.V. Due process protects “all ‘persons’ within the United States, including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533 U.S. at 693.

35. Civil immigration detention violates due process if it is not reasonably related to its purpose. *See Zadvydas*, 533 U.S. at 690 (citing *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)); *Demore*, 538 U.S. at 513. As categorical detention becomes increasingly prolonged, a sufficiently strong special justification is required to outweigh the significant deprivation of liberty. *Zadvydas*, 533 U.S. at 690-91

36. Civil detention also violates due process unless it is accompanied by strong procedural protections to guard against the erroneous deprivation of liberty. *Id.* at 690-91; *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992). To justify Mr. Zamora Mejia’s ongoing detention, due process requires that the government provide a legal justification for his ongoing detention. *United States v. Salerno*, 481 U.S. 739, 750, 752 (1987); *Svetlana Doe, et al., v. Noem, et al.*, No. 25-cv-10495 (D. Mass. April 14, 2025).

37. Mr. Zamora Mejia has not been afforded the necessary procedural safeguards to guarantee against the erroneous deprivation of his liberty. This is particularly true as Mr. Zamora Mejia’s period of detention grows and where the government provides no legal justification for his

ongoing detention.

38. Under these circumstances, Mr. Zamora Mejia's detention violates both substantive and procedural due process.

*Count Violation of the Administrative Procedure Act*

39. Mr. Zamora Mejia re-alleges and incorporates the preceding paragraphs.

40. Under the Administrative Procedure Act (hereinafter "APA"), a court shall "hold unlawful and set aside agency action" that is an abuse of discretion. 5 U.S.C. § 706(2)(A).

41. An action is an abuse of discretion and an violation of the APA if the agency "entirely failed to consider an important aspect of the problem, offered an explanation for its decision that runs counter to the evidence before the agency, or is so implausible that it could not be ascribed to a difference in view or the product of agency expertise." *Nat'l Ass'n of Homebuilders v. Defs. Of Wildlife*, 551 U.S. 644, 658 (2007)(quoting *Motor Vehicle Mfrs. Ass'n of U.S., Inc. v. State Farm Mut. Auto. Ins. Co.*, 463 U.S. 29, 42 (1983)).

42. By not recognizing the applicability of the September 8, 2025, federal register notice to Respondent's case, Respondents violated the APA.

*VIII. P R A E R R R E I E*

*HERE RE*, Mr. Zamora Mejia prays that this Court grant the following relief:

1. Accept jurisdiction and maintain continuing jurisdiction of this action;
2. Order Respondents to show cause why the writ should not be granted within three days, and, if necessary, set a hearing on this Petition within two days of the return, pursuant to 28 U.S.C. § 2243;
3. Issue a writ of habeas corpus ordering Respondents to immediately release Mr. Zamora Mejia from their custody;
4. Enter preliminary and permanent injunctive relief enjoining Respondents from further

unlawful detention of Mr. Zamora Mejia;

5. Enjoin Respondents from transferring Mr. Zamora Mejia outside the jurisdiction of the Court pending resolution of this matter;

6. Declare that Mr. Zamora Mejia's detention violates the Due Process Clause of the Fifth Amendment;

7. Declare that Mr. Zamora Mejia's detention violates the Immigration and Nationality Act;

8. Declare that Mr. Zamora Mejia's detention violates the Administrative Procedures Act;

9. Award reasonable attorney's fees and costs pursuant to the Equal Access to Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412; and

10. Grant such further relief as this Court deems just and proper.

Dated: October 29, 2025

Respectfully submitted,

/s/Francisco F. Symphorien-Saavedra/s/  
Francisco F. Symphorien-Saavedra, Esquire  
Board Certified Specialist  
Florida Bar No. 0051614  
Frank@symphorienlaw.com  
Evelyn J. Pabon Figueroa, Esquire  
Florida Bar No. 0015594  
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P.O. Box 1627  
Orlando, FL 32802  
Phone: (407) 802-1717  
Attorneys for Petitioner

*Verification by Someone Acting on the Petitioner's Behalf Pursuant to USC*

I, Francisco F. Symphorien-Saavedra, hereby declare under penalty of perjury that the facts  
alleged in the foregoing Petition for Writ of Habeas Corpus are true and correct, to the best of my  
knowledge. Dated: October 29, 2025

Respectfully submitted,

/s/Francisco F. Symphorien-Saavedra/s/  
Francisco F. Symphorien-Saavedra, Esquire  
Board Certified Specialist  
Florida Bar No. 0051614  
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Orlando, FL 32802  
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Attorneys for Petitioner

C E R T I F I C A T E I N E R E S E D P E R S O N S  
A N D C O N T R A D I C T O R Y S T A T E M E N T S

I HEREBY CERTIFY that the following persons may have an interest in the outcome of this case:

1. *Bondi, Pamela*, Attorney General of the United States, U.S. Department of Justice
2. *Guthrie, Kevin*, Executive Director of the Florida Division of Emergency Management
3. *Yons, Todd M.*, Acting Director of ICE, U.S. Department of Homeland Security
4. *Mazzara, Joseph N.*, Acting General Counsel, Department of Homeland Security
5. *Noem, Kristi*, Secretary, Department of Homeland Security
6. *Pabon Figueroa, Evelyn J.*, Esquire, Counsel for Petitioner
7. *Ripa, Garrett*, ICE Field Office Director for the Miami Field Office, Department of Homeland Security
8. *Symphorien-Saavedra, Francisco F.*, Esquire, Counsel for Petitioner
9. *Amora Mejia, Jose Rafael*, Petitioner

Dated: October 29, 2025

/s/Francisco F. Symphorien Saavedra/s/  
Francisco F. Symphorien-Saavedra, Esq  
Board Certified Specialist  
Florida Bar No. 0051614  
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Evelyn J. Pabon Figueroa, Esquire  
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P.O. Box 1627  
Orlando, FL 32802  
Phone: (407) 802-1717  
Attorneys for Petitioner

*CER I ICA E SERVICE*

I, Francisco "Frank" Symphorien-Saavedra, certify that on October 29, 2025, I caused a true and exact copy of the foregoing writ to be served by first class certified mail on the following:

*Kristi Noem*

Secretary, U.S. Department of Homeland Security  
C/O General Counsel  
2707 Martin Luther King Jr. Ave. SE  
Washington, D.C. 20528

*Pamela Bondi*

U.S. Attorney General  
United States Department of Justice  
950 Pennsylvania Avenue Room B-103  
Washington DC 20530-0001

*odd M. yons*

Acting Director  
Immigration and Customs Enforcement  
Office of the Principal Legal Advisor  
500 12th Street SW  
Washington, DC 20536

*Garrett Ripa*

Field Office Director  
Miami Field Office, ICE  
Office of the Principal Legal Advisor  
500 12th Street SW  
Washington, DC 20536

*U.S. Attorney s ffi e, Civil Pro ess Cler*

2110 W First St #3-137  
Fort Myers, FL 33901

*Kevin Guthrie*

Executive Director  
Florida Division of Emergency Management  
2555 Shumard Oak Boulevard  
Tallahassee, Florida 32399

/s/Francisco F. Symphorien Saavedra/s/  
Francisco F. Symphorien-Saavedra, Esq  
Board Certified Specialist  
Florida Bar No. 0051614  
Attorney for Petitioner

*Documents in Support of Complaint*

*Pablo Alejandro Zamora Mejia v. Kristi Noem, et al.*

Exhibit A: I-94 2018

Exhibit B: I-589 Receipt Notice

Exhibit C: TPS Approval

Exhibit C: Arrest record

Exhibit E: Email sent to ICE Counsel

Exhibit E: ICE Detainee Locator Information

*C E R T I F I C A T E A U T H E N T I C*

I, Francisco "Frank" Symphorien-Saavedra, certify and declare under penalty of perjury that the above referenced exhibits are authentic and true and correct copies of the original documents contained in the administrative record of proceedings to the best of my knowledge.

Dated: October 29, 2025

/s/Francisco F. Symphorien-Saavedra/s/  
Francisco F. Symphorien-Saavedra, Esquire  
Board Certified Specialist  
Florida Bar No. 0051614  
Frank@symphorienlaw.com  
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Attorneys for Petitioner

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

<p><b>I. (a) PLAINTIFFS</b></p> <p style="text-align: center;">Pablo Alejandro Zamora Mejia</p> <p><b>(b)</b> County of Residence of First Listed Plaintiff <u>Collier County</u>  <small>(EXCEPT IN U.S. PLAINTIFF CASES)</small></p> <p><b>(c)</b> Attorneys (Firm Name, Address, and Telephone Number)                  Francisco F. Symphorien-Saavedra Esq.                  Symphorien-Saavedra Law, PA.                  P. O. Box 1627 Orlando Florida 32802</p>	<p style="text-align: center;"><b>DEFENDANTS</b></p> <p style="text-align: center;">U.S. Department of Homeland Security et al</p> <p>County of Residence of First Listed Defendant _____  <small>(IN U.S. PLAINTIFF CASES ONLY)</small></p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED</p> <p>Attorneys (If Known)                  Office of the United States Attorney                  Fort Myers, Florida</p>
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<p><b>II. BASIS OF JURISDICTION</b> (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p><b>III. CITIZENSHIP OF PRINCIPAL PARTIES</b> (Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <table style="width:100%; border-collapse: collapse;"> <tr> <td style="width:30%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> <td style="width:40%;"></td> <td style="width:10%; text-align: center;"><b>PTF</b></td> <td style="width:10%; text-align: center;"><b>DEF</b></td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business In This State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business In Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		<b>PTF</b>	<b>DEF</b>		<b>PTF</b>	<b>DEF</b>	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business In This State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business In Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
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**IV. NATURE OF SUIT** (Place an "X" in One Box Only) Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice	<p><b>PERSONAL INJURY</b></p> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <p><b>PERSONAL PROPERTY</b></p> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <p style="text-align: center;"><b>LABOR</b></p> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <p style="text-align: center;"><b>IMMIGRATION</b></p> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <p style="text-align: center;"><b>INTELLECTUAL PROPERTY RIGHTS</b></p> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <p style="text-align: center;"><b>SOCIAL SECURITY</b></p> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <p style="text-align: center;"><b>FEDERAL TAX SUITS</b></p> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<p><b>REAL PROPERTY</b></p> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<p><b>CIVIL RIGHTS</b></p> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education	<p><b>PRISONER PETITIONS</b></p> <p><b>Habeas Corpus:</b></p> <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <p><b>Other:</b></p> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

**V. ORIGIN** (Place an "X" in One Box Only)

1 Original Proceeding   
 2 Removed from State Court   
 3 Remanded from Appellate Court   
 4 Reinstated or Reopened   
 5 Transferred from Another District (specify)   
 6 Multidistrict Litigation - Transfer   
 8 Multidistrict Litigation - Direct File

**VI. CAUSE OF ACTION**

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 U.S.C. § 2241; 28 U.S.C. § 1651; 28 U.S.C. § 2201; 5 U.S.C. § 7706(1); 28 U.S.C. § 2412; 5 U.S.C. § 504

Brief description of cause:  
 PETITION FOR WRIT OF HABEAS CORPUS

**VII. REQUESTED IN COMPLAINT:**

CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.    **DEMAND \$** \_\_\_\_\_    **JURY DEMAND:**  Yes  No

**VIII. RELATED CASE(S) IF ANY** (See instructions):

JUDGE \_\_\_\_\_ DOCKET NUMBER \_\_\_\_\_

DATE: 10/29/2025    SIGNATURE OF ATTORNEY OF RECORD: s/ Francisco F. Symphorien-Saavedra s/

**FOR OFFICE USE ONLY**

RECEIPT # \_\_\_\_\_ AMOUNT \_\_\_\_\_ APPLYING IFP \_\_\_\_\_ JUDGE \_\_\_\_\_ MAG. JUDGE \_\_\_\_\_