

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF LOUISIANA

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U.S. DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA

DEPUTY CLERK

Leonardo Campos Molina,
Petitioner,

vs.

Case No: 25-1040-BAJ-SDJ

U.S. Immigration & Custom Enforcement;
K. Jordan, Warden, Camp 57, Angola, La. /

REPLY TO RESPONDENT'S RESPONSE TO PETITION
FOR WRIT OF HABEAS CORPUS UNDER 28 USC 32241

Petitioner, Leonardo Campos Molina, prose, respectfully submits his Reply to Respondent's Response to Petition for Writ of Habeas Corpus under 28 USC 32241, pursuant to the applicable Rules of court, states the following:

A. Petitioner satisfied his burden of showing that removal is not reasonably foreseeable.

Petitioner respectfully argues that the record speak for itself. Petitioner has shown, and Respondents do not dispute, that he has been in ICE custody for over 6 months and no attempt has been made to remove Petitioner.

Petitioner further argues that Respondent's

conclusory claim removal to a third country is available does not satisfy the government's burden once the removal period has expired. See: *Balza v. Barr*, No. 6:20-cv-00866, 2020 WL 6143643 (W.D. La. Sept. 17, 2020). Respondent's have merely stated that Petitioner may be sent to Mexico. However, to this date Respondents have not submitted concrete factual information (i.e. that Mexico agreed to accept Petitioner).

B. Petitioner Does Not Pose a Danger to the Community.

Petitioner respectfully submits, that he has extensive ties in the community. He has his family and guaranteed employment upon his return to the community. Petitioner does not have a violent criminal record.

Petitioner respectfully argues that there is no sufficiently strong special justification for Respondent's contention that Petitioner poses a danger to the community. Contrary to Respondent's argument, the U.S. Supreme Court in *Zadvydas v. Davis*, 533 US 678 (2001) has explained that they have upheld preventive detention based on dangerousness only when limited to specially dangerous individuals. Petitioner has never been declared a dangerous individual.

Wherefore, Petitioner respectfully prays this Honorable Court will grant his prose Petition for Writ of Habeas Corpus filed pursuant to 28 USC § 2241 and further orders Petitioner's immediate release from ICE Custody.

Respectfully submitted,


1-8-2026

Leonardo Campos Molina

Date

Alien # 

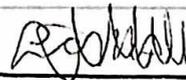
Camp 57

17344 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 via U.S. Postal Mail to: Chase E. Zachary, Ass. U.S. Attorney, 451 Florida Street, Suite 300, Baton Rouge, La. 70801 on this 8 day of January, 2026.



Leonardo Campos Molina, prose.