

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

**Luis Enrique Castaneda-Reyes**  
Reg. No.   
Petitioner (Pro Se)

v.

**Warden, FCI Fort Dix  
AND  
Director, ICE Newark Field Office**  
Respondents

Civil Action No. \_\_\_\_\_

**RECEIVED**  
DEC -9 2025  
AT 8:30 M  
CLERK, U.S. DISTRICT COURT - DNJ


**PETITION FOR WRIT OF HABEAS CORPUS  
UNDER 28 U.S.C. § 2241**

**I. Jurisdiction**

This Court has jurisdiction under 28 U.S.C. §

2241 because Petitioner is currently in federal custody within this District and challenges the legality of present restraint caused by a disputed ICE detainer and coerced immigration paperwork.

**II. Statement of Facts**

1. Petitioner is a lawful permanent resident of the United States who has lived in this country since 1987.
2. Petitioner is married to a United States citizen and is the father of three United States citizen children.
3. Petitioner's BOP Register Number is  His scheduled release date is December 18, 2025.
4. Petitioner was recently instructed by BOP staff to sign immigration-related documents. Petitioner was told his release would be delayed or denied if he refused.

5. Petitioner was not informed that signing could be treated as a waiver of rights or as consent to removal.
6. Petitioner was not provided a copy of any form he signed.
7. Petitioner was subsequently informed that he will receive no Second Chance Act or halfway house placement due to the ICE detainer.
8. Petitioner disputes that he ever knowingly agreed to removal or to waive any legal right.
9. The ICE detainer and disputed paperwork are causing present unlawful restraint and injury, including denial of programming and release opportunities.

### **III. Grounds for Relief**

- A. Petitioner's signature was not knowing, voluntary, or informed.
- B. The ICE detainer is causing present, concrete harm by denying halfway house and Second Chance Act eligibility.
- C. BOP has failed to provide Petitioner copies of documents he signed despite repeated verbal requests.
- D. Due process requires that Petitioner be given access to his own immigration paperwork and an opportunity to contest any alleged waiver.
- E. Without Court intervention, Petitioner will be transferred into ICE custody based on involuntary paperwork, causing irreparable harm to family stability and legal rights.

### **IV. Relief Requested**

Petitioner respectfully requests:

1. An order requiring Respondents to immediately produce copies of all immigration-related documents Petitioner signed.
2. A declaration that Petitioner's signature on said documents does not constitute a valid, knowing, or voluntary waiver of rights.
3. An order directing BOP to reconsider Petitioner's eligibility for Second Chance Act and Residential Reentry Center placement.

4. An order prohibiting Respondents from relying upon the disputed paperwork until the Court determines its validity.

5. Any further relief the Court deems just and appropriate.

Respectfully submitted, 12.2.25

*Luis Enrique Castaneda-Reyes*  
Luis Enrique Castaneda-Reyes

Reg. No. 

FCI Fort Dix

Joint Base MDL, NJ 08640

A  (Alien Number)