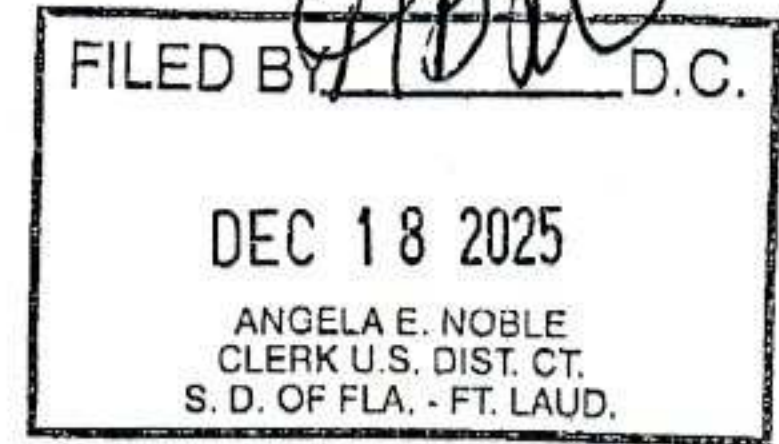


Justin Santiago Tejada-Galo

3300 NW 11<sup>th</sup> ct Apt 206  
Miami, FL 33127

**PRO SE**



**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA  
FORT LAUDERDALE DIVISION**

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Justin Santiago Tejada-Galo, as next friend on behalf  
of Nilda Estela Galo,

*Petitioner-Plaintiff,*

v.

Garrett J Ripa, Field Office Director for Detention and  
Removal, U.S Immigration and Customs Enforcement;  
Todd LYONS, Acting Director of United States  
Department of Homeland Security;

*Respondent(s)*

) Case No.

) PETITION FOR WRIT OF HABEAS CORPUS

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

Petitioner respectfully petitions this Honorable Court for a writ of habeas corpus to remedy petitioner's unlawful Detention by Respondents, as follows:

**INTRODUCTION**

1. Justin Santiago Tejada Galo ("Petitioner" or "Petitioner-Plaintiff") brings this action as next friend on behalf of his mother, *Nilda Estela Galo*, a 50-year-old from Honduras who is currently detained by Immigration and Customs Enforcement ("ICE") at the Broward Transitional Center pending of removal proceedings.

2. Petitioner's mother has been detained in Immigration custody for over 48 hours even though no federal Judge of Immigration Judge ("IJ")--- has conducted a hearing to determine whether this incarceration is warranted based on danger or flight risk.
3. On or about December 15, 2025, Respondent Garrett J Ripa, arrested Ms. Nilda Galo while she was leaving the supermarket and placed her in custody at the Miramar Ice Office Field, in which she was transferred later on to the Pompano Beach Immigration facility.
4. Petitioner's mother was detained by ("ICE") while she has a T-Visa application pending, which constitutes an undue restriction of her personal freedom.
5. Petitioner's mother therefore respectfully requests that this Court issue a writ of habeas corpus, determine that Petitioner's mother detention is not justified because the government has not established by clear and convincing evidence that Petitioner's mother presents a risk of flight or danger in light of available alternatives to detention.

#### JURISDICTION AND VENUE

6. This action arises under the Due Process Clause of the Fifth Amendment of the U.S. Constitution. Jurisdiction is proper under 28 U. S. C. § 1331 ( federal question), 2241 (habeas corpus); U.S. Const. art I, § 2; (Suspension Clause); and 5 U.S.C. § 702 (Administrative Procedure Act). This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241
7. Venus is proper in this district and division pursuant to 28 U.S.C. § 2241 and 28 U.S.C § 1391

**STATEMENT OF FACTS**

8. Petitioner's mother is a National and citizen of Honduras who was previously ordered removed on May 16, 2005
9. After being ordered removed, Ms. Galo applied for a T Nonimmigrant Visa, a temporary U.S immigration status for victims of severe human trafficking or labor who cooperate with the law enforcement in investigating or prosecuting trafficking cases, offering them protection, work authorization and a path to lawful permanent residence.
10. Ms. Galo is not a danger to the community or a flight risk. She has no pending criminal cases
11. Ms. Galo has deep roots in this community; she has a U.S. citizen son who needs her with him, as he suffers from anxiety and depression due to his mother currently immigration status.
12. Prior to her arrest, Ms. Galo was working, paying her taxes, and providing for her son. Her continued detention deprives her family of her companionship and income.

**PARTIES**

13. Petitioner's Mother is a national and citizen of Nicaragua who was order removed on May 16, 2005. She is detained by the Respondents pursuant to 8 U.S.C § 1231, which permits the DHS to detain aliens, such as Petitioner's mother, pending execution of the alien's removal order.

14. Respondent Garrett J Ripa is a Field Office Director for Detention and Removal, Respondent Todd Lyons, is a Acting Director of the United States Department of homeland Security.

**REQUIREMENTS OF 28 U.S.C. § 2241**

15. The Court must grant the petition for writ of habeas corpus of issue and order to show cause (“OSC”) to Respondents “ forthwith”, unless Petitioner’s mother is not entitled to relief. 28 U.S.C. § 2241. If the Court issues an OSC, it must require Respondents to file a return “within three days unless for good cause additional time, not exceeding twenty days, is allowed.”
16. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ affords “a swift and imperative remedy in all cases of illegal restraint or confinement.”

**CLAIM FOR RELIEF**

**CONSTITUTIONAL CLAIM**

17. Petitioner’s mother re-alleges and incorporates by references the paragraphs above
18. Petitioners’ mother detention violate her right to substantive and procedural due process guaranteed by the Fifth Amendment to the U.S. Constitution
19. Petitioner’s mother continued detention violates the Immigration and Nationality Act and the U.S. Constitution

**PRAYER FOR RELIEF**

WHEREFORE, Petitioner respectfully prays that this Court grant the following relief:

1. Assume jurisdiction over this matter;
2. Issue a writ of habeas corpus ordering Respondents to release Ms. Nilda Estela Galo on his own recognizance or under parole, a low bond or reasonable Conditions of supervision show;
3. Award Petitioner his costs and reasonable attorney's fees; and,
4. Grant such further relief as the Court deems just and proper.

Respectfully submitted,

December 17, 2025

*Date*

Justin Santiago Tejada – Galo

*Print Name*



*Signature*

**CERTIFICATE OF SERVICE**

I hereby certify that on December 17, 2025, I caused a true and correct copy of the  
Foregoing Petitions for Writ of Habeas Corpus and all accompanying pages to be served by  
Certified mail, on the following:

Krome North Processing Center – Miami Field Office  
18201 SW 12<sup>th</sup> St  
Miami FL, 33194

U.S Attorney's office Southern District of Florida  
99 NE 4<sup>TH</sup> ST,  
Miami, FL 33132



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Justin Santiago Tejada Galo