

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JORGE ALBERTO GALEANO NAVARRETE,
Petitioner,

FILED
John E. Triplett, Clerk of Court
United States District Court

By jamesburrell at 11:24 am, Jan 06, 2026

v.

TAYLOR JONES,
Field Office Director,
U.S. Immigration and Customs Enforcement,

MERRICK B. GARLAND,
Attorney General of the United States,
Respondents.

Civil Action No. 4:26-cv-0006

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

INTRODUCTION

Petitioner, Jorge Alberto Galeano Navarrete, by and through his Next Friend, Maritza Claribel Sánchez Guzmán, respectfully petitions this Honorable Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241. Petitioner is currently detained at Stewart Detention Center as a result of an unlawful, warrantless arrest executed by Immigration and Customs Enforcement while he was complying with a scheduled ICE appointment.

Petitioner's continued detention violates the Fourth Amendment, the Fifth Amendment Due Process Clause, and controlling Supreme Court precedent. The detention is arbitrary, punitive, and unsupported by any individualized determination of flight risk or danger to the community.

JURISDICTION AND VENUE

This Court has jurisdiction pursuant to 28 U.S.C. § 2241, 28 U.S.C. § 1331, and the Suspension Clause of the United States Constitution. Venue is proper in this District because Petitioner is detained within the Southern District of Georgia at Stewart Detention Center in Lumpkin, Georgia.

PARTIES

Petitioner is Jorge Alberto Galeano Navarrete, A-Number [REDACTED] a native and citizen of Nicaragua, born on [REDACTED]. He entered the United States on April 20, 2022, was granted parole upon entry, and has a pending asylum application.

Next Friend is Maritza Claribel Sánchez Guzmán, born [REDACTED] residing at [REDACTED]
[REDACTED]

NEXT FRIEND STANDING

Petitioner is unable to fully litigate this matter on his own due to his detention, medical condition, and limited access to legal resources. His long-term partner, Maritza Claribel Sánchez Guzmán, has a significant relationship with Petitioner and is dedicated to acting in his best interests. Accordingly, she has standing to proceed as Next Friend pursuant to *Whitmore v. Arkansas*, 495 U.S. 149 (1990).

STATEMENT OF FACTS

Petitioner lawfully entered the United States on April 20, 2022, and was granted parole by the Department of Homeland Security. He subsequently filed an application for asylum, which remains pending.

Petitioner consistently complied with all ICE reporting requirements. On December 15, 2025, while appearing responsibly at a scheduled ICE appointment, Petitioner was arrested without a judicial warrant.

Petitioner has no criminal record, worked lawfully, paid taxes, and suffers from a serious cardiac condition that causes tachycardia, which has worsened due to detention stress.

LEGAL ARGUMENT

I. THE WARRANTLESS ARREST VIOLATED THE FOURTH AMENDMENT

The Fourth Amendment prohibits unreasonable seizures and requires a warrant issued by a neutral magistrate. Petitioner was arrested without a judicial warrant, in violation of *Gerstein v. Pugh*, 420 U.S. 103 (1975).

II. PETITIONER'S DETENTION VIOLATES DUE PROCESS

Civil detention must be non-punitive and reasonably related to a legitimate government interest. *Zadvydas v. Davis*, 533 U.S. 678 (2001).

III. PETITIONER IS NOT A FLIGHT RISK

Petitioner voluntarily complied with ICE, has strong family ties, lawful employment, and no history of absconding.

IV. PETITIONER IS NOT A DANGER TO THE COMMUNITY

Petitioner has no criminal history and poses no threat to public safety.

V. MEDICAL VULNERABILITY REQUIRES IMMEDIATE RELEASE

Detention that endangers life violates due process. *Estelle v. Gamble*, 429 U.S. 97 (1976).

VI. PENDING ASYLUM AND PAROLE STATUS FAVOR RELEASE

Petitioner's parole and pending asylum application further support release.

REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court issue the Writ of Habeas Corpus, order Petitioner's immediate release, or alternatively order a prompt individualized bond hearing, and grant any further relief deemed just and proper.

VERIFICATION

I, Maritza Claribel Sánchez Guzmán, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Respectfully submitted,



Maritza Claribel Sánchez Guzmán

Next Friend of Petitioner



Date: 12-29-25

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this Petition was served upon the Office of the United States Attorney for the Southern District of Georgia.



Maritza Claribel Sánchez Guzmán

Date: 12-29-25

Letter of Support and Good Moral Character

For Federal Court Consideration

12-22-2025

Honorable Federal Judge,

My name is Ernesto Absalón Maradiaga, and I respectfully submit this letter in support of Jorge Alberto Galeano Navarrete for your consideration. I have known Jorge since he was a child, and over the years I have served as a father figure and mentor in his life. I also served as his sponsor during his immigration process, a responsibility I accepted based on my full confidence in his character and integrity.

Jorge has consistently demonstrated good moral character, honesty, and respect for the law. Throughout his legal and immigration process, he has fully complied with all legal requirements, court mandates, and reporting obligations imposed upon him. To my knowledge, he has always appeared as required and has shown a sincere commitment to resolving his case through lawful means.

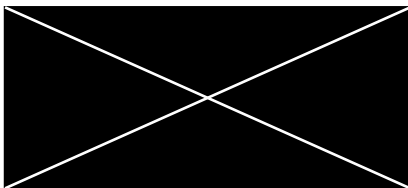
Based on my long-term relationship with Jorge, I firmly believe that he does not pose a risk to the community nor a flight risk. Allowing him to remain free would enable him to continue complying with the legal process as he has been doing, while maintaining stability and support from those who care for him and are willing to assist him throughout these proceedings.

I respectfully ask the Court to consider Jorge Alberto Galeano Navarrete's demonstrated compliance, good moral character, and strong community support when evaluating his eligibility to remain at liberty while his legal process continues.

Thank you, Your Honor, for your time and consideration. Should the Court require any additional information, I am willing and available to provide it.

Respectfully submitted,

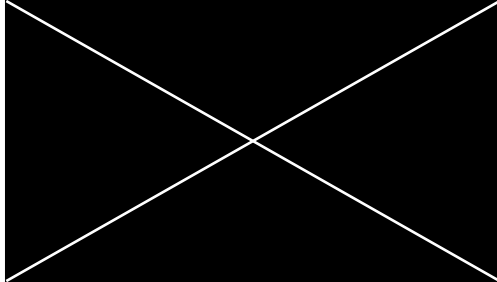
Ernesto Absalón Maradiaga



A handwritten signature in black ink that reads "Ernesto Absalón Maradiaga".

Letter of Good Moral Character for Immigration Purposes

Ronne José Faria Andrade



12/22/2025

To Whom It May Concern,

I am writing this letter in support of Jorge Alberto Galeano Navarrete for immigration purposes and to attest to his good moral character.

My name is Ronne José Faria Andrade, and I have had the privilege of knowing Jorge Alberto Galeano Navarrete for several years. During this time, I have come to know him as an honest, responsible, and respectful individual. Our relationship has allowed me to observe his character closely, both personally and within the community.

Jorge is a hardworking and trustworthy person who consistently demonstrates integrity, strong moral values, and respect for the law. He treats others with kindness and professionalism and is always willing to help those around him. He has shown a genuine commitment to bettering himself and contributing positively to society.

Throughout the time I have known him, Jorge has proven to be a person of good conduct, reliability, and strong ethical principles. He is well respected by those who know him and conducts himself in a manner that reflects positively on his character at all times.

I fully support Jorge Alberto Galeano Navarrete in his immigration process and firmly believe that he is a person of good moral character who would continue to be a positive and productive member of this country.

Thank you for taking the time to consider this letter. Should you require any additional information, please do not hesitate to contact me using the information provided above.

Sincerely,

Ronne José Faria Andrade

Signature

A handwritten signature in black ink, appearing to be 'Ronne José Faria Andrade', written over a horizontal line.

12/22/2025
Mamiyah Phifer
Quality, Environmental,
Health and Safety Manager

Dear Presiding Judge,

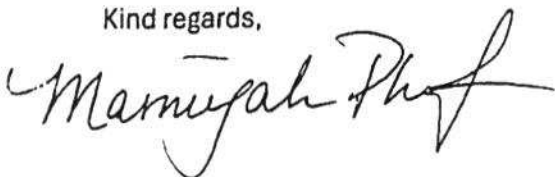
First, I'd like to thank you for allowing myself and others the opportunity to speak on our experiences, friendships and professional relationships with Jorge Galeano.

I've known Jorge or as we call him at work Galeano, for three years now. When I started, he was already a leader within the team and I was able to identify this immediately. The way he leads by example and demonstrates ethical practices that align with company policies, I knew he'd eventually begin to work his way up in the company. While there was the obvious language barrier, we learned to communicate. By doing so, Galeano encouraged the rest of the team to welcome me, as well as trust me in order to be a voice, listening ear and advocate when needed.

The young man that I'm writing this letter for is a prime example of someone who wants better, someone who appreciates the opportunities here in America, someone who doesn't let their circumstances define who they are or what they are capable of achieving. One thing that sticks out the most about Galeano, is the love he has for his son. The way he lights up when speaking about him and the pure joy he has when showing pictures of his son. I asked him once; do you miss him and the sadness that swept over his face would've been noticeable to any parent. In his own words he explained that he did miss him a lot but that it's better for him to be here.

Whenever we have after work events, I've noticed that Galeano is the one encouraging the rest of the team to attend. Getting to know him and the challenges he's faced at such a young age, really makes me appreciate the life I was given. As Manager of safety and environment, I really appreciate his willingness to lead the rest of the team to adhere to regulations set in place. I never have to ask twice. Galeano is honest, helpful and just a good person to know. His perseverance and dedication to having a better life is motivation. Sir or Ma'am, please allow this young man to remain here in Charlotte N.C. I was born and raised here and he is an example of the melting pot that Charlotte has become. I love my city and part of what I love the most is cultural diversity and how the city has created a place of opportunity for those willing to give it their best. Jorge Galeano without a doubt is and will continue to give it his all.

Kind regards,



Julia Thompson



Charlotte, NC 28206

21 December 2025

To Whom It May Concern:

My name is Julia Thompson, and I am the Technical Manager at Colquimica Adhesives, Inc. I am writing this letter in support of Jorge Alberto Galeano-Navarrete's good character and conduct in his immigration proceedings.

I had the pleasure of working with Jorge since he started in Colquimica in 2023. Our professional relationship consists of feedback regarding the quality of final product, reporting problems, and consistent repair and maintenance of vital equipment to Colquimica's operations. In his time at Colquimica, he started as an operator, swiftly became the expert on the production lines, and then was promoted to maintenance technician.

Jorge has a strong work ethic and is hungry to learn. As an operator, he was the expert on one of the main production lines. Jorge was trusted as the point of contact for troubleshooting, and it was frequently noted by his colleagues and supervisors that he made the machine "sing". This year Jorge was promoted to maintenance technician. In the monthly operations meetings, the maintenance manager regularly highlights Jorge's contributions to the team. The past few months he had the best metrics, particularly completing the most work orders and finishing them on time. Jorge's work and integrity are important to Colquimica operations, and his absence is already felt.

North Carolina

December 22, 2025

To Whom It May Concern:

My name is Jessica Purificacao, and I am a United States citizen residing in North Carolina.

I am writing this letter in support of **Jorge Alberto Galeano Navarret**, whom I have known for a little over three years as a coworker. During this time, we have also interacted socially on several occasions, including holiday gatherings and other events through his partner. These experiences have allowed me to get to know him both professionally and personally.

On a personal level, Mr. Galeano has always been kind, attentive, and genuinely welcoming. Whether at Christmas celebrations or other social events, he consistently goes out of his way to make others feel included. His positive personality is infectious, and I have never heard him speak negatively about anyone. His uplifting presence is one of the reasons I invited him to my own birthday celebration.

At work, his positivity is just as evident. You can always tell when it is his shift because he is often singing or greeting others with enthusiasm, and the entire team seems to be in a better mood when he is around. His attitude contributes greatly to a supportive and enjoyable work environment.

Professionally, Mr. Galeano has excelled in every role he has taken on. He began as a machine operator and quickly became the most skilled operator on his line. Even after being promoted, employees, including those with more years of experience, continue to seek guidance because of his expertise. His strong work ethic, reliability, and generosity with his knowledge led to a rapid promotion from operator to production line supervisor.

One example that stands out occurred during a week when many employees were out sick with the flu. Despite already being in his new maintenance role, Mr. Galeano stepped in to help on the production line to ensure operations continued smoothly. His willingness to go above and beyond is consistent with the person I have come to know.

His dedication to learning and his natural aptitude resulted in yet another promotion into the maintenance department, where he excelled in a short period of time and receives frequent praise.

CONTROL Name (Last, First, Middle) GILBERTO-HERNANDEZ, JORGE ALBERTO						
Birthdate ██████████		Age 26	Marital Status <input checked="" type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Separated <input type="checkbox"/> Widowed <input type="checkbox"/> Divorced		File Number ██████████ A240 748 937	
Sex M	Hair BLK	Eyes BRN	Complexion MED	Height 66	Weight 140	Scars or Marks None Visible
U.S. Address/Residence (Number) (Street) (City) (State) (ZIP CODE) ████████████████████████████████████████████████████████████████████████████████						
Alert's Telephone # ██████████			Date of Action 04/21/2022		Location Code WRL	
City, Province (State) and Country of Birth JITOTUCA, JITOTUCA, NICARAGUA				Country of Citizenship NICARAGUA		
Date, Place, Time, and Manner of Last Entry/Attempted Entry 04/20/2022, PMA, .5 mile(s) S of ICB, PMA (ST EAST)				Status at Entry PMA Mexico		
Foreign Address/Residence (Number, Street, City, Province (State), Country) ████████████████████████████████████████████████████████████████████████████████						
Method of Location/Apprehension PB UNKNOWN			(A/Near) MEXICO, TX		Date & Hour 04/20/2022 0741	

U.S. DEPARTMENT OF HOMELAND SECURITY
 IMMIGRATION AND CUSTOMS ENFORCEMENT
 June 20, 2022
 RAN (X5)
 4/20/22 RAN

CONTROL Name (Last, First, Middle) GARCIA-RODRIGUEZ, JUAN ALBERTO							
Date of Birth [REDACTED]		Age 26	Marital Status <input checked="" type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Separated		Widowed <input type="checkbox"/> Married <input type="checkbox"/> Divorced		File Number [REDACTED]
Sex M	Hair BLK	Eyes BRN	Complexion MED	Height 66	Weight 140	Scars or Marks None Visible	
U.S. Address/Mail (Number, Street, City, Province (State), Country) [REDACTED]							
Alien's Telephone # [REDACTED]			Date of Action 04/21/2022			Location Code WEL	
City, Province (State) and Country of Birth JINOTEGUA, JINOTEGUA, NICARAGUA					Country of Citizenship NICARAGUA		
Date, Place, Time, and Manner of Last Entry-Attempted Entry 04/20/2022, 0700, .3 mile(s) E of km, near the APT.					Status at Entry PMA Mexico		
Foreign Address/Residence (Number, Street, City, Province (State), Country) RD. MARCOS RODRIGUEZ LA VIEJA JOYAS, S. JINOTEGUA, JINOTEGUA NICARAGUA							
Method of Location Acquisition PB CONTOUR			(As Near) [REDACTED]			Date & Hour 04/20/2022 0741	

CONTROL Name (Last, First, Middle) GARCIA-RODRIGUEZ, JUAN ALBERTO							
Date of Birth [REDACTED]		Age 26	Marital Status <input checked="" type="checkbox"/> Single <input type="checkbox"/> Married <input type="checkbox"/> Separated		Widowed <input type="checkbox"/> Married <input type="checkbox"/> Divorced		File Number [REDACTED]
Sex M	Hair BLK	Eyes BRN	Complexion MED	Height 66	Weight 140	Scars or Marks None Visible	
U.S. Address/Mail (Number, Street, City, Province (State), Country) [REDACTED]							
Alien's Telephone # [REDACTED]			Date of Action 04/21/2022			Location Code WEL	
City, Province (State) and Country of Birth JINOTEGUA, JINOTEGUA, NICARAGUA					Country of Citizenship NICARAGUA		
Date, Place, Time, and Manner of Last Entry-Attempted Entry 04/20/2022, 0700, .3 mile(s) E of km, near the APT.					Status at Entry PMA Mexico		
Foreign Address/Residence (Number, Street, City, Province (State), Country) RD. MARCOS RODRIGUEZ LA VIEJA JOYAS, S. JINOTEGUA, JINOTEGUA NICARAGUA							
Method of Location Acquisition PB CONTOUR			(As Near) [REDACTED]			Date & Hour 04/20/2022 0741	

North Carolina
December 20, 2025

To Whom It May Concern:

My name is Matthew Miguel Ruiz, and I am a disabled United States military veteran. Although I am no longer able to work due to my disability, I previously had the opportunity to work with Mr. Jorge Alberto Galeano Navarrete, and I respectfully submit this letter in support of his good moral character.

Mr. Jorge Alberto Galeano Navarrete, a native of Nicaragua, is currently being held at a detention facility in the United States. Through our professional interaction, I came to know him as a responsible, respectful, and hardworking individual.

During the time I worked with Mr. Galeano Navarrete, he consistently demonstrated honesty, reliability, and respect for others. He followed rules, showed a strong work ethic, and maintained a positive attitude. At no point did he display violent behavior or conduct that would pose a danger to the community. On the contrary, he showed integrity and good moral character in all aspects of his conduct.

Based on my personal experience and knowledge, I firmly believe that Mr. Jorge Alberto Galeano Navarrete is a person of good moral character who would be a positive and contributing member of society. I respectfully ask that this letter be taken into consideration as moral support in his immigration proceedings.

I provide this letter in good faith and am willing to provide additional information if needed.

Sincerely,

Mruiz
Matthew Miguel Ruiz
Disabled U.S. Military Veteran



A handwritten signature in black ink, appearing to read 'Mruiz', written in a cursive style.

North Carolina
December 27, 2025

To whom it may concern:

My name is Brian Bido an active dental worker in North Carolina, United States. I previously had the opportunity to meet and share with Mr. Jorge Alberto Galeano Navarrete, and I respectfully submit this letter in support of his good moral character.

Mr. Jose Alberto Galeano Navarrete, a native of Nicaragua is being held at a detection facility in the United States. Through our professional interaction, I came to know him as a responsible, respectful and hardworking individual.

During the time I know him he consistently demonstrated honesty, reliability and respect for others. He followed rules, showed a strong work ethic, and maintained a positive attitude. At no point did he display violent behavior or conduct that would pose a danger to the community. On the contrary, he showed integrity and good moral character in all aspects of his conduct.

Based on my personal experience and knowledge, I firmly believe that Mr. Jorge Alberto Galeano Navarrete is a person of good moral character who would be a positive and contributing member of society. I respectfully ask that this letter be taken into consideration as moral support in his immigration proceedings.

I provide this letter in good faith and am willing to provide additional information if needed.

Sincerely,



Brian J. Bido



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF GEORGIA
SAVANNAH DIVISION**

JORGE ALBERTO GALEANO NAVARRETE,
Petitioner,

v.

TAYLOR JONES,
Field Office Director,
U.S. Immigration and Customs Enforcement,

MERRICK B. GARLAND,
Attorney General of the United States,
Respondents.

Civil Action No. _____

PROOF OF SERVICE

I, Maritza Claribel Sánchez Guzmán, hereby certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that on the date indicated below, I served a true and correct copy of the following documents:

- Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241;
- Motion for Immediate Release;
- Sworn Declaration of Maritza Claribel Sánchez Guzmán;
- All supporting exhibits.

Service was completed by depositing the documents in the United States Mail, first-class postage prepaid, addressed to the following parties:

1. Office of the United States Attorney
Southern District of Georgia
22 Barnard Street, Suite 300
Savannah, GA 31401

2. Attorney General of the United States

U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, DC 20530

3. Office of the Principal Legal Advisor (OPLA)

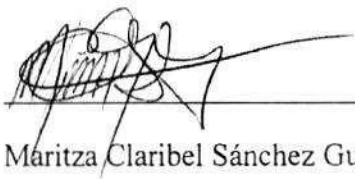
U.S. Immigration and Customs Enforcement
5107 Leesburg Pike
Falls Church, VA 22041

4. Stewart Detention Center

Attn: Superintendent / Warden
146 CCA Road
Lumpkin, GA 31815

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 12-29-25



Maritza Claribel Sánchez Guzmán

Next Friend of Petitioner

