

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT

for the Southern District of Florida

FILED BY [Signature] D.C.
JAN 13 2026
ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S. D. OF FLA. - MIAMI

PEDROZO ECHEVARRIA, CARLOS ALBERTO

Petitioner

v.

WARDEN, KROME SERVICE PROCESSING CENTER

Respondent

(name of warden or authorized person having custody of petitioner)

Case No. (Supplied by Clerk of Court)

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

Personal Information

- 1. (a) Your full name: PEDROZO ECHEVARRIA, CARLOS ALBERTO
(b) Other names you have used:
2. Place of confinement:
(a) Name of institution: KROME SERVICE PROCESSING CENTER
(b) Address: 18201 SW 12 TH STREET
MIAMI, FLORIDA 33194
(c) Your identification number: A # [Redacted]
3. Are you currently being held on orders by:
[Checked] Federal authorities [] State authorities [] Other - explain:
4. Are you currently:
[] A pretrial detainee (waiting for trial on criminal charges)
[] Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced you:
(b) Docket number of criminal case:
(c) Date of sentencing:
[Checked] Being held on an immigration charge
[] Other (explain):

Decision or Action You Are Challenging

- 5. What are you challenging in this petition:
[] How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

- Pretrial detention
- Immigration detention
- Detainer
- The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- Disciplinary proceedings
- Other (explain): _____

6. Provide more information about the decision or action you are challenging:
- (a) Name and location of the agency or court: U.S IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE)
KROME SERVICE PROCESSING CENTER MIAMI, FLORIDA
 - (b) Docket number, case number, or opinion number: _____
 - (c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):
CONTINUED IMMIGRATION DETENTION
 - (d) Date of the decision or action: 10/30/2025

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

- Yes
- No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court: _____
- (2) Date of filing: _____
- (3) Docket number, case number, or opinion number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(b) If you answered "No," explain why you did not appeal: _____

NO ADMINISTRATIVE APPEAL PROCESS AVAILABLE FOR IMMIGRATION DETENTION.

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

- Yes
- No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a second appeal: _____
NO ADMINISTRATIVE APPEAL PROCESS AVAILABLE.

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a third appeal: _____
NO ADMINISTRATIVE APPEAL PROCESS AVAILABLE.

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

Yes No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

Yes No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

Yes No

If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence:

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

Yes No

If "Yes," provide:

- (a) Date you were taken into immigration custody: 10/30/2025
- (b) Date of the removal or reinstatement order: _____
- (c) Did you file an appeal with the Board of Immigration Appeals?

Yes No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

- (1) Date of filing: _____
- (2) Case number: _____
- (3) Result: _____
- (4) Date of result: _____
- (5) Issues raised: _____

(d) Did you appeal the decision to the United States Court of Appeals?

Yes No

If "Yes," provide:

- (1) Name of court: _____
- (2) Date of filing: _____
- (3) Case number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

Yes No

If "Yes," provide:

- (a) Kind of petition, motion, or application: _____
- (b) Name of the authority, agency, or court: _____
- (c) Date of filing: _____
- (d) Docket number, case number, or opinion number: _____
- (e) Result: _____
- (f) Date of result: _____
- (g) Issues raised: _____

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: UNLAWFUL CONTINUED IMMIGRATION DETENTION IN VIOLATION OF THE DUE PROCESS CLAUSE.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

PETITIONER IS SUBJECT TO A FINAL ORDER OF REMOVAL, BUT REMOVAL IS NOT REASONABLY FORESEEABLE. PETITIONER WAS RE-DETAINED ON OCTOBER 30, 2025, AFTER YEARS OF COMPLIANCE UNDER AN ORDER OF SUPERVISION. PETITIONER HAS REMAINED IN CONTINUED IMMIGRATION DETENTION WITHOUT NOTICE OF REMOVAL DATE.

(b) Did you present Ground One in all appeals that were available to you?

Yes

No

GROUND TWO: ARBITRARY RE-DETENTION WITHOUT ANY MATERIAL CHANGE IN CIRCUMSTANCES.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

PETITIONER WAS PREVIOUSLY RELEASED UNDER AN ORDER OF SUPERVISION AND COMPLIED WITH ALL ICE SUPERVISION REQUIREMENTS FOR YEARS. PETITIONER NEVER MISSED A CHECK-IN, NEVER ABSCONDED, AND HAS NO NEW CRIMINAL INCIDENTS OR SUPERVISION VIOLATIONS. DESPITE FULL COMPLIANCE AND NO CHANGE IN CIRCUMSTANCES, ICE RE-DETAINED PETITIONER ON OCTOBER 30, 2025, WITHOUT A HEARING OR EXPLANATION OF CHANGED CIRCUMSTANCES.

(b) Did you present Ground Two in all appeals that were available to you?

Yes

No

GROUND THREE: CONTINUED DETENTION SERVES NO LEGITIMATE GOVERNMENTAL PURPOSE AND IS EXCESSIVE IN RELATION TO ITS CIVIL OBJECTIVE.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

PETITIONER POSES NO FLIGHT RISK OR DANGER TO THE COMMUNITY. PETITIONER HAS SERIOUS AND CHRONIC MEDICAL CONDITIONS THAT REQUIRE REGULAR MEDICAL CARE. LESS RESTRICTIVE ALTERNATIVES TO DETENTION WERE PREVIOUSLY UTILIZED SUCCESSFULLY. CONTINUED DETENTION HAS NO FORESEEABLE END.

(b) Did you present Ground Three in all appeals that were available to you?

Yes

No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

GROUND FOUR: CONTINUED IMMIGRATION DETENTION CAUSES IRREPARABLE HARM DUE TO PETITIONER'S SERIOUS MEDICAL CONDITIONS.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

PETITIONER SUFFERS FROM END-STAGE GLAUCOMA, DIABETES, HYPERTENSION, AND A HERNIA THAT LIMITS MOBILITY. PETITIONER REQUIRES REGULAR MEDICAL MONITORING AND SPECIALIST CARE. PETITIONER'S HEALTH HAS DETERIORATED DURING DETENTION. CONTINUED DETENTION PLACES PETITIONER AT RISK OF SERIOUS AND IRREPARABLE HARM.

(b) Did you present Ground Four in all appeals that were available to you?

Yes No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: NO ADMINISTRATIVE APPEAL PROCESS AVAILABLE FOR IMMIGRATION DETENTION.

Request for Relief

15. State exactly what you want the court to do: ORDER PETITIONER'S IMMEDIATE RELEASE FROM IMMIGRATION DETENTION OR IN THE ALTERNATIVE, ORDER ANY RELIEF THE COURT DEEMS JUST AND PROPER.

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

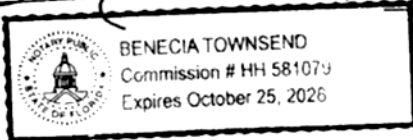
I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 12-30-2025

Carla G. Peterson
Signature of Petitioner

B 12/30/2025

Signature of Attorney or other authorized person, if any



CERTIFICATE OF SERVICE

I hereby certify that on this date, I filed true and correct copy of the foregoing Petition for Writ of Habeas Corpus (AO-242), along with supporting documents, by hand delivery with the Clerk of the United States District Court for the Southern District of Florida.

Service upon Respondents has not yet been made, as Respondents are not required to be served or to respond unless and until ordered by the Court.

Executed on January 13, 2026.

Respectfully submitted,

Karen Hidalgo

Karen Hidalgo

Daughter of Petitioner

