

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 1:26-cv-20247-KMW

CARLOS ALBERTO DIONICIO CABRERA,
Petitioner,

v.

TODD LYONS, Acting Director, U.S. Immigration
and Customs Enforcement, *et al.*,
Respondents.

SUPPLEMENTAL PLEADING TO ORDER TO SHOW CAUSE

The Director of Miami Field Office, *et al.* (“Respondents”), through the undersigned Assistant United States Attorney, and pursuant to this Court’s Paperless Order entered on January 27, 2026 (ECF No. 13), respectfully file this supplemental pleading in opposition to Petitioner Carlos Alberto Dionicio Cabrera’s (“Petitioner”) Petition for a Writ of Habeas Corpus (“Petition”).

OTHER BASES FOR DETENTION

As of January 29, 2026, there are no other bases for Petitioner’s detention besides the arguments outlined in the Respondent’s Response to the Court’s Order to Show Cause (ECF No. 8). Respondents incorporate all preceding arguments as if fully set forth herein.

SUPPLEMENTAL DECLARATION

Respondents also provide an update to this Court with respect to scheduling Petitioner for an informal interview in connection with the Notice of Revocation of Release served on Petitioner on January 18, 2026. Immigration and Customs Enforcement Enforcement and Removal Operations (ICE ERO) has attempted multiple times to schedule Petitioner’s informal interview through Petitioner’s counsel, Mr. Jose Flores, but to date, ICE ERO has not received any response as to Mr. Flores’ availability. *See* Exh. A, Signed Declaration of Supervisory Detention and Deportation Officer Carisa Bauza.

CONCLUSION

For the reasons set forth above, the Petition for Writ of Habeas Corpus should be denied.

Respectfully submitted,

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UNITED STATES ATTORNEY

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CERTIFICATE OF COMPLIANCE

I certify that on January 29, 2026, I uploaded the attached document to the Court's PACER system.

By: /s/ John Ghannam
John Ghannam
Assistant United States Attorney