

PETITION FOR WRIT OF HABEAS CORPUS

(28 U.S.C. § 2241 – Next Friend Petition)

UNITED STATES DISTRICT COURT

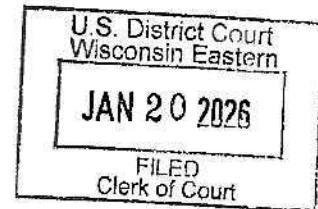
EASTERN DISTRICT OF WISCONSIN

BRYAN CAMILO ALGARRA GONZÁLEZ A# 241-695-108

Petitioner,

v.

WARDEN, DODGE DETENTION FACILITY, Respondent.



PETITION FOR WRIT OF HABEAS CORPUS (28 U.S.C. § 2241)

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT:

Petitioner, by and through his wife and next friend, respectfully petitions this Honorable Court for a writ of habeas corpus under 28 U.S.C. §2241 and states the following:

I. JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. § 2241, because Petitioner is in federal custody within the territorial jurisdiction of this Court.

2. Venue is proper in the United States District Court for the Eastern District of Wisconsin because Petitioner is detained at Dodge Detention Facility, located in Juneau, Wisconsin.

II. PARTIES

3. Petitioner is Bryan Camilo Algarrá González, A# [REDACTED] a noncitizen currently detained by U.S. Immigration and Customs Enforcement (ICE) at Dodge Detention Facility.

4. This Petition is filed by Stephanie Forero Robledo, Petitioner's spouse, acting as Next Friend, because Petitioner is detained, has limited access to legal resources, and is unable to file this Petition on his own behalf.

5. Respondent is the Warden of Dodge Detention Facility, who has immediate custody over the Petitioner.

III. STATEMENT OF FACTS

6. Petitioner entered the United States on or about July 30, 2022, through the southern border.

7. Since his detention, Petitioner has complied fully with all immigration requirements and has not posed a danger to the community or flight risk.

8. Petitioner was processed by immigration authorities and issued an A-Number, evidencing that the government assumed jurisdiction over his immigration matter.

9. Despite this, no Notice to Appear (NTA) was ever properly filed with the Immigration Court, and Petitioner does not appear in the EOIR system.

10. Because no removal proceedings were initiated, Petitioner filed an affirmative asylum application with USCIS, as permitted under law when no Immigration Court case is pending.


11. USCIS later administratively cancelled or closed Petitioner's asylum application due to policy changes, without transferring the case to Immigration Court.

12. Petitioner has never appeared before an Immigration Judge, has never signed voluntary departure, and has never been issued a final order of removal.

13. Petitioner is currently detained at Dodge Detention Facility and has been held for approximately one month.

14. ICE has failed to identify any lawful statutory basis for Petitioner's continued detention, as there is no pending removal proceeding and no final order of removal.

15. Petitioner has no criminal history.

16. The petitioner has a family in the United States, his wife Stephanie Forero Robledo, who suffers from a chronic illness called  and this is one of the reasons why she depends physically, emotionally, and financially on Mr. Bryan Camilo Algarra González.

IV. LEGAL GROUNDS FOR RELIEF

A. Violation of the Fifth Amendment – Due Process

17. The Fifth Amendment prohibits deprivation of liberty without due process of law.

18. Detaining a Petitioner without a pending immigration proceeding or final order of removal constitutes arbitrary and unlawful detention.

B. Lack of Statutory Authority for Continued Detention

19. ICE lacks authority to detain Petitioner indefinitely where no Immigration Judge has jurisdiction, and no removal order exists.

20. Administrative errors by the government cannot justify continued civil detention.

C. Government Estoppel and Fundamental Fairness

21. Any procedural defects in Petitioner's case are solely the result of government failure to properly initiate proceedings.

22. Under principles of equity and due process, the government may not benefit from its own administrative errors.

V. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Court:

A. Grant this Petition for Writ of Habeas Corpus;

B. Order Petitioner's immediate release from ICE custody;

OR, IN THE ALTERNATIVE,

C. Order ICE to provide a prompt bond hearing before an Immigration Judge;

D. Order ICE to identify the legal basis for Petitioner's detention or terminate detention;

E. Grant any other relief the Court deems just and proper.

VI. VERIFICATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on: 01/15/2026

Stephanie Forero R.
Stephanie Forero Robledo

Next Friend of

Bryan Camilo Algarra González

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