

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF FLORIDA

FORT MYERS DIVISION

JAN 22 2026 PM 1:05  
FILED - USDC - FLMD - FTM

**RAYDEL PERDOMO**

Date of Birth: [REDACTED]

Native and Citizen of Cuba

A-Number: [REDACTED]

Booking Number: [REDACTED]

Inmate Number: [REDACTED]

Petitioner,

v.

**U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE),  
ICE FIELD OFFICE DIRECTOR, MIAMI FIELD OFFICE,**

Respondents.

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

**I. JURISDICTION AND VENUE**

This Court has jurisdiction under 28 U.S.C. § 2241 because Petitioner is in federal immigration custody and challenges the legality and duration of his detention. Venue is proper in the Fort Myers Division of the Middle District of Florida because Petitioner is detained within this District under the authority of U.S. Immigration and Customs Enforcement (ICE).

**II. PETITIONER'S BACKGROUND**

Petitioner Raydel Perdomo was born on [REDACTED] and is a native and citizen of Cuba. He was brought to the United States at the age of 13 by his parents as a political refugee fleeing Cuba. Since that time, Petitioner has lived his entire life in the United States. All of Petitioner's family resides in the United States, including his son, and the United States is the only home he has ever known.

**III. CUSTODY HISTORY**

Petitioner was initially detained on November 25, 2025, at the Jacksonville Jail, where he remained for approximately 37–38 days. On January 2, 2026, Petitioner was transferred into ICE custody, where he remains detained. Petitioner has now been detained for more than 90 days total without being brought before an immigration judge or provided a bond hearing.

#### **IV. UNLAWFUL AND PROLONGED DETENTION**

Petitioner has not received a hearing before an immigration judge within a reasonable or lawful period. Continued detention beyond 90 days without judicial review violates the Due Process Clause of the Fifth Amendment and Supreme Court precedent prohibiting prolonged civil detention without adequate procedural safeguards. Petitioner's detention has become punitive rather than administrative, rendering it unconstitutional.

#### **V. CONDITIONS OF CONFINEMENT**

Conditions of ICE detention are inhumane and unsafe, particularly for individuals with serious mental health conditions. Petitioner suffers from Post-Traumatic Stress Disorder (PTSD), Anxiety, and Bipolar Disorder. These conditions are severely exacerbated by prolonged detention, lack of adequate mental health care, and stressful confinement. Continued detention places Petitioner's mental health and well-being at serious risk.

#### **VI. REQUEST FOR RELIEF**

WHEREFORE, Petitioner respectfully requests that this Court grant this Petition for Writ of Habeas Corpus; order Petitioner's immediate release from ICE custody; in the alternative, order an individualized bond hearing before an immigration judge; and grant any other relief this Court deems just and proper.

#### **VII. VERIFICATION**

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

Date: 1-21-24

Signature: Raydel  
Raydel Perdomo  
Petitioner, Pro Se