UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA

Domilio Antonio Teran Perez,	
Petitioner,	
	Case No.:
v.	
	A# [redacted]
David Harden, Warden of Glades County Detention Center; Garrett Ripa, Miami Field Office Director, Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement, Department of Homeland Security; Todd M. Lyons, Acting Director, U.S. Immigration and Customs Enforcement; Kristi Noem, Secretary of the U.S. Department of Homeland Security; and Pamela Bondi, Attorney General of the United States, each in their Official capacities.	**PETITION FOR WRIT OF HABEAS CORPUS**
Respondents.	

PETITION FOR WRIT OF HABEAS CORPUS

The Petitioner, Domilio Antonio Teran Perez, (hereinafter "Petitioner" or "Mr. Perez") by and through undersigned counsel, respectfully petitions this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 to compel his release from custody, as his current civil immigration detention violates the Due Process Clause of the United States Constitution and the Immigration and Nationality Act.

INTRODUCTION

1. Petitioner respectfully petitions this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, challenging his continued and unlawful detention by United States Immigration and Customs Enforcement ("ICE"). Petitioner seeks immediate release, or in the alternative, a constitutionally adequate bond hearing.

2. Petitioner Domilio Antonio Teran Perez is a Native and Citizen of Venezuela. He is currently 40 years old.

3. Petitioner was detained on November 21, 2025 in Melbourne, Florida after he was pulled over for a traffic violation on his way to work; the license plate on the trailer he was hauling had fallen off and Petitioner had not noticed. He was thereafter transferred into the custody of the Department of Homeland Security ("DHS") and has remained in civil detention in the custody of ICE at Glades County Detention Center.

4. Petitioner has resided in the United States for three (3) years. Prior to his detention, Petitioner lived and provided financial and emotional support for his family in Grassland, Florida. His ongoing detention imposes a severe hardship on his family by depriving his family of both his financial and emotional support.

5. The Petitioner lawfully entered the United States on January 26, 2023, and has lived in the United States since that time. **Exhibit A: Parole Entry with Stamp**

6. Petitioner's ongoing detention violates the Immigration and Nationality Act ("INA"), the Due Process Clause of the Fifth Amendment, and governing Supreme Court precedent.

7. This petition challenges the government's ongoing violation of Petitioner's statutory and constitutional rights. ICE's continued detention of Petitioner and absence of any public safety threat violates the Immigration and Nationality Act ("INA"), which limits civil detention to reasonable periods and lawful purposes, as well as the Due Process Clause of the Fifth Amendment, which prohibits punitive or arbitrary detention.

8. Petitioner's continued detention has become punitive in nature, violating the Due Process Clause of the Fifth Amendment. Civil detention is permissible only so long as it serves a legitimate immigration purpose, such as ensuring appearance or protecting the public.

9. Petitioner was legally paroled into the United States on January 26, 2023 until January 24, 2025, and has lived in the United States since that time.

10. Petitioner was paroled after USCIS' approved his I-131, Parole Petition. He was legally admitted by CBP at the Miami International Airport.

11. Subsequent to his lawful entry on parole, Petitioner filed for asylum on January 24, 2024, which is currently pending. He has not been scheduled for his USCIS Asylum interview. **Exhibit B: Asylum Receipt Notice**

12. He later filed for Temporary Protected Status ("TPS") on December 15, 2023 and was approved from June 3, 2024 through April 2, 2025. **Exhibit C: TPS Approval Notice**

13. After Petitioner entered the US, the US government has terminated the two programs that kept him in valid status (the parole program and the TPS program). Petitioner had no control over the termination of these programs nor did he violate the terms of either the parole or TPS status.

14. Petitioner has no criminal record and is not a flight risk. **Exhibit D: Background Check - Not Record Found**

15. Petitioner now faces unlawful detention because the Department of Homeland Security (DHS) and the Executive Office of Immigration Review (EOIR) have wrongfully concluded that Petitioner is subject to mandatory detention as an arriving alien and was thus denied bond.

16. On his NTA, Petitioner is charged with being an "arriving alien", as well as "immigrant not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Immigration and Nationality Act; and/or you are an immigrant not in possession of a valid unexpired passport, or other suitable travel document, or document of identity and nationality." **Exhibit E**, Notice to Appear served on the Petitioner on November 23, 2025 at p. 1.

17. As per Petitioner's NTA, the basis under which Respondents claim the Petitioner is subject to removal is: INA § "212 (a)(7)(A)(i)(I) of the Immigration

and Nationality Act (Act), as amended, as an immigrant who, at the time of **application for admission,** is not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act." (emphasis added) *See* 8 U.S.C. § 1182(a)(7)(A)(i).

18. After arresting Petitioner in Melbourne, Florida, ICE did not set bond and Petitioner is unable to obtain review of his custody by an IJ, pursuant to the Board's decision in *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025).

19. Petitioner had a bond hearing on December 11, 2025, at which he requested a custody redetermination pursuant to 8 C.F.R. § 1236 and was denied by Immigration Judge Marsha Nettles, due to the fact that the Respondents incorrectly categorized Petitioner "as an arriving alien." **Exhibit F**, EOIR IJ's decision from Dec. 11, 2025.

20. Petitioner's detention on this basis violates the plain language of the Immigration and Nationality Act. § 1225(b)(2)(A) of the INA does not apply to individuals like Petitioner who previously entered and are now residing in the United States. Instead, such individuals, like Petitioner, are subject to a different statute, § 1226(a), that allows for release on conditional parole or bond.

21. Respondents' new legal interpretation is plainly contrary to the statutory framework and contrary to decades of agency practice applying § 1226(a) to people like Petitioner.

22. His prolonged detention, despite his pending asylum petition and strong family ties bears no reasonable relation to those purposes and instead operates as punishment. Such punitive confinement is unconstitutional in the context of civil immigration.

23. Petitioner's continued detention is unlawful because it (1) exceeds the scope of detention authority permitted under the INA, and (2) violates the Fifth Amendment's Due Process Clause by subjecting him to punitive and indefinite confinement.

24. Petitioner therefore respectfully requests that this Court issue a writ of habeas corpus and order Petitioner's release from custody, with appropriate conditions of supervision, if necessary, without imposing any alternative to detention ankle monitoring.

25. Accordingly, Petitioner seeks a writ of habeas corpus requiring that he be released.

JURISDICTION

26. Petitioner is in the physical custody of Respondents. Petitioner is detained at the Glades County Detention Center in Moore Haven, FL.

27. This action arises under the Constitution of the United States and the Immigration and Nationality Act ("INA").

28. This Court has subject matter jurisdiction over this Petition pursuant to 28 U.S.C. § 2241 (habeas corpus); 28 U.S.C. § 1331 (federal question); and Article I, § 9, clause 2 of the U.S. Constitution ("Suspension Clause"); 28 U.S.C. §2201 et. seq. (Declaratory Judgment Act); 28 U.S.C. § 1651 (All Writs Act); 5 U.S.C. § 702 (Administrative Procedure Act), and the INA, specifically, 8 U.S.C. § 1226(a).

29. Because Petitioner seeks to challenge his custody as a violation of the Constitution and laws of the United States, jurisdiction is proper in this court.

VENUE

30. Pursuant to *Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Middle District of Florida, the judicial district in which Petitioner currently is detained.

31. Venue is also proper in this Court pursuant to 28 U.S.C. § 1391(e)(1)(A) because Respondents are operating in this district and are directly responsible for the confinement of Petitioner. *Rumsfeld v. Padilla, 542 U.S. 426, 430 (2004).*

REQUIREMENTS OF 28 U.S.C. § 2243

32. The Court must grant the petition for writ of habeas corpus or order Respondents to show cause "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, Respondents must file

a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

33. Habeas corpus is "perhaps the most important writ known to the constitutional law . . . affording as it does a swift and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added). "The application for the writ usurps the attention and displaces the calendar of the judge or justice who entertains it and receives prompt action from him within the four corners of the application." *Yong v. I.N.S.*, 208 F.3d 1116, 1120 (9th Cir. 2000) (citation modified).

PARTIES

34. Petitioner, **Domilio Antonio Teran Perez**, is a citizen and national of Venezuela who has been in immigration detention since November 21, 2025 and is currently being held at the Glades County Detention Facility in Moore Haven, Florida. His Alien Registration Number ("A Number") is [redacted]. Petitioner is a resident of Florida. He is in the custody, and under the direct control, of Respondents and their agents.

35. Respondent **David Harden**, Warden of Glades County Detention Center. Respondent David Harden is Petitioner's immediate custodian and is responsible for Petitioner's detention and removal. He is named in his official capacity.

36. Respondent **Garrett Ripa**, is the Field Office Director for the Miami Field Office for ICE within DHS. In that capacity, Field Director Ripa exercises

authority over Petitioner's detention, transfer, and potential release. He is sued in her official capacity.

37. Respondent **Todd M. Lyons**, is the Acting Director of U.S. Immigration and Customs Enforcement ("ICE"). Respondent Lyons is responsible for Petitioner's detention, and is sued in his official capacity.

38. Respondent **Kristi Noem** is the Secretary of the Department of Homeland Security. She is responsible for the implementation and enforcement of the Immigration and Nationality Act (INA), and oversees ICE, which is responsible for Petitioner's detention. Ms. Noem has ultimate custodial authority over Petitioner and is sued in her official capacity.

39. Respondent **Pamela Bondi** is the Attorney General of the United States. She is responsible for the Department of Justice, of which the Executive Office for Immigration Review and the immigration court system it operates is a component agency. She is sued in her official capacity.

40. Each Respondent is a legal custodian of Petitioner, and are sued in their respective official capacity.

EXHAUSTION

41. There is no statutory exhaustion requirement in 28 U.S.C. § 2241. Any requirement of administrative exhaustion is therefore purely discretionary.

42. Moreover, where the agency has predetermined a dispositive issue, no further action with the agency is necessary. *See, e.g., Monestime v. Reilly*, 704 F. Supp. 2d 453, 456-57 (S.D.N.Y. 2010) (holding that administrative challenges to a

noncitizen's classification under the mandatory detention statute would be futile given the agency's precedent on the issue).

43. The BIA interprets § 1225(b) as mandating detention of arriving aliens pending removal proceedings. *See Matter of X-K-*, 23 I&N Dec. 731, at 732 (BIA 2005) ("There is no question that Immigration Judges lack jurisdiction [for a bond hearing] over arriving aliens who have been placed in... removal proceedings..."). Exhaustion before the BIA would therefore be futile.

44. Further, "the BIA [Board of Immigration Appeals] does not have jurisdiction to adjudicate constitutional issues..." (citation modified). *United States v. Gonzalez-Roque*, 301 F.3d 39, 48 (2d Cir. 2002). Because petitioner raises a constitutional due process claim in his habeas petition, exhaustion of his due process claims would be futile.

LEGAL FRAMEWORK

45. Federal courts possess jurisdiction to review immigration detention claims through the writ of habeas corpus under 28 U.S.C. § 2241. The statute explicitly allows challenges by individuals who are "in custody in violation of the Constitution or laws or treaties of the United States" Habeas review is particularly appropriate where detention is arbitrary, prolonged, or otherwise unlawful.

46. Numerous courts have affirmed that immigration detainees may invoke § 2241 to test the legality of their confinement. See *INS v. St. Cyr*, 533 U.S. 289 (2001) (recognizing habeas jurisdiction for legal and constitutional claims of noncitizens); *Zadvydas v. Davis*, 533 U.S. 678 (2001) (permitting habeas relief

where detention exceeds statutory or constitutional limits). Because Petitioner is detained in this District, jurisdiction properly lies with this Court.

47. The Fifth Amendment's Due Process Clause applies broadly to "all persons" within the United States, including noncitizens regardless of their immigration status. *See Mathews v. Diaz*, 426 U.S. 67, 77 (1976). The protection of due process encompasses both liberty and bodily integrity and includes freedom from arbitrary civil detention.

48. On September 5, 2025, the Board of Immigration Appeals ("BIA") issued a binding precedent decision holding that an immigration judge lacks authority to consider bond requests for individuals who entered the United States without admission. *Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). The Board concluded that such individuals are subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible for release on bond. As a result, Petitioner has been categorically barred from seeking custody redetermination before an immigration judge, leaving habeas corpus as his sole available remedy to challenge continued detention.

49. The Fifth Amendment prohibits the federal government from imposing punishment without due process of law. This principle extends to immigration detention, which is civil, not criminal, in nature. *See Bell v. Wolfish*, 441 U.S. 520, 535 (1979). Conditions of confinement for civil detainees are unconstitutional when they rise to the level of punishment rather than regulation.

50. The INA prescribes three basic forms of detention for the vast majority of noncitizens in removal proceedings.

51. First, 8 U.S.C. § 1226 authorizes the detention of noncitizens in standard removal proceedings before an Immigration Judge ("IJ"). See 8 U.S.C. § 1229a. Individuals in § 1226(a) detention are generally entitled to a bond hearing at the outset of their detention, see 8 C.F.R. §§ 1003.19(a), 1236.1(d), while noncitizens who have been arrested, charged with, or convicted of certain crimes are subject to mandatory detention, see 8 U.S.C. § 1226(c).

52. 8 U.S.C. § 1225 only applies to noncitizens actively seeking admission at the border or its immediate functional equivalent. So, Respondents have wrongfully classified the Petitioner as an arriving alien as Petitioner was paroled in over three (3) years ago:

> *"To begin, the phrase 'seeking admission' is ambiguous in the context of the INA. Section 1225 defines an 'applicant for admission' as '[a]n alien present in the United States who has not been admitted or who arrives in the United States[.]' And 'admission' and 'admitted' are defined as 'the lawful entry of the alien into the United States after inspection and authorization by an immigration officer.'" Garcia-Perez v. Walker, 25-62639-CV-DIMITROULEAS, at *5 (S.D. Fla. Jan 07, 2026) (citation modified).*

53. *Garcia-Perez,* goes on to state:

> *"[b]ut the INA does not define 'seeking admission'. Some courts have noted that the phrase 'implies*

> *action-something that is currently occurring, and . . . would most logically occur at the border upon inspection.'" Garcia-Perez v. Walker, 25-62639-CV-DIMITROULEAS, at *5 (S.D. Fla. Jan 07, 2026) (citation modified) (citing Lopez-Campos v. Raycraft, No. 2:25-cv-12486, 2025 WL 2496379, at *6 (E.D. Mich. Aug. 29, 2025).*

54. Further, "the Court turns to the structure of § 1225 and § 1226, and their legislative history- which each support Petitioner's interpretation. Whereas § 1225 governs removal proceedings for arriving aliens, § 1226(a) serves as a catchall." *Garcia-Perez v. Walker*, No. 25-62639-CV-DIMITROULEAS, at *6 (S.D. Fla. Jan. 7, 2026) (citation modified) (citing *Pizarro Reyes v. Raycraft*, No. 25-cv-12546, 2025 WL 2609425, at *5 (E.D. Mich. Sept. 9, 2025)).

55. "As the Supreme Court noted in *Jennings*, § 1226 'creates a default rule' that 'applies to aliens already present in the United States.'" *Garcia-Perez v. Walker*, 25-62639-CV-DIMITROULEAS, at *6.

56. "The inclusion of a 'catchall' provision in § 1226, particularly following the more specific provision in § 1225, is 'likely no coincidence, but rather a way for Congress to capture noncitizens who fall outside of the specified categories.'" *Garcia-Perez* at *6.

57. The circumstances surrounding Petitioner's arrest align with § 1226(a), not § 1225(b)(2)(A).

58. On September 5, 2025, the Board of Immigration Appeals ("BIA" or "Board") incorrectly held that an immigration judge has no authority to consider

bond requests for any person who entered the United States without admission. *See Matter of Yajure Hurtado*, 29 I. & N. Dec. 216 (BIA 2025). The Board determined that such individuals are subject to detention under 8 U.S.C. § 1225(b)(2)(A) and therefore ineligible to be released on bond.

59. Since then, dozens of federal district courts have rejected the BIA's interpretation of the INA's detention authorities. Courts have likewise rejected *Matter of Yajure Hurtado*, which adopts the same reading of the statute as ICE.

60. Respondents reliance on the BIA's decision in *Matter of Yajure Hurtado* - rejecting the argument that a noncitizen who entered the United States on parole and has resided here for years is not "seeking admission" under § 1225(b)(2)(A) is thus misplaced.

61. Further, under *Loper Bright*, courts need not defer to the BIA's interpretation of law simply because the statute is ambiguous. *See Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 413 (2024).

62. The Court in *Garcia-Perez,* found that "the statutory text, context, and scheme of § 1225 do not support a finding that a noncitizen is 'seeking admission' when he never sought to do so. Additionally, numerous courts that have examined the interpretation of § 1225 articulated by Respondents-particularly following the BIA's decision in *Matter of Yajure Hurtado*-have rejected their construction and adopted Petitioner's." *Garcia-Perez v. Walker*, 25-62639-CV-DIMITROULEAS, at *8 (S.D. Fla. Jan 07, 2026).

63. The Court in *Garcia-Perez* further found "[f]or these reasons, the Court finds that § 1226(a) and its implementing regulations govern Petitioner's detention, not § 1225(b)(2)(A)." Id.

64. Section 1226(a) applies by default to all persons "pending a decision on whether the [noncitizen] is to be removed from the United States." These removal hearings are held under § 1229a, to "decid[e] the inadmissibility or deportability of a[] [noncitizen]."

65.Section 1226 therefore leaves no doubt that it applies to people who face charges of being inadmissible to the United States, including those who are present without admission or parole.

66. By contrast, § 1225(b) applies to people arriving at U.S. ports of entry or who recently entered the United States. The statute's entire framework is premised on inspections at the border of people who are "seeking admission" to the United States. 8 U.S.C. § 1225(b)(2)(A). Indeed, the Supreme Court has explained that this mandatory detention scheme applies "at the Nation's borders and ports of entry, where the Government must determine whether a[] [noncitizen] seeking to enter the country is admissible." *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018).

67.Accordingly, the mandatory detention provision of § 1225(b)(2)(A) does not apply to people like Petitioner, who have already entered and were residing in the United States at the time they were apprehended.

FACTS

68. Petitioner has resided in the United States since January 26, 2023 and lives in Grassland, Florida.

69. On November 21, 2025 Petitioner was pulled over for a traffic violation, Petitioner was unaware that the license plate had fallen off the trailer he was hauling. Petitioner is now detained at the Glades County Detention Facility.

70. Petitioner is charged with being an "arriving alien", as well as "immigrant not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Immigration and Nationality Act; and/or you are an immigrant not in possession of a valid unexpired passport, or other suitable travel document, or document of identity and nationality."

71. Respondents claim the Petitioner is subject to removal is: INA § "212 (a)(7)(A)(i)(I) of the Immigration and Nationality Act (Act), as amended, as an immigrant who, at the time of **application for admission,** is not in possession of a valid unexpired immigrant visa, reentry permit, border crossing card, or other valid entry document required by the Act, and a valid unexpired passport, or other suitable travel document, or document of identity and nationality as required under the regulations issued by the Attorney General under section 211(a) of the Act." (emphasis added) *See* 8 U.S.C. § 1182(a)(7)(A)(i).

72. Petitioner had a bond hearing on December 11, 2025, at which he requested a custody redetermination pursuant to 8 C.F.R. § 1236 and was Denied

by Immigration Judge Marsha Nettles, due to the fact that Petitioner "is arriving alien."

73. As a result, Petitioner remains in detention. Without relief from this court, he faces the prospect of months, or even years, in immigration custody, separated from his family and community.

COUNT I

VIOLATION OF THE IMMIGRATION AND NATIONALITY ACT ("INA") – 8 U.S.C. §§ 1226

74. Petitioner incorporates by reference all preceding paragraphs as it fully set herein.

75. The Immigration and Nationality Act authorizes immigration detention only for narrow, lawful purposes: to ensure attendance at removal proceedings and to protect the community. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001). Detention beyond those limited purposes violates both the statute and the Constitution.

76. Petitioner's detention exceeds the statutory limits Congress intended.

77. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. As relevant here, it does not apply to those who previously entered the country and have been residing in the United States prior to being apprehended and placed in removal proceedings by Respondents. Such

noncitizens are detained under § 1226(a), unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.

78. Petitioner is not subject to a final order of removal and therefore falls under §1226(a), which does not authorize indefinite or punitive custody. Petitioner has resided in the United States for over 3 years, and has no criminal record.

79. The government has not shown that Petitioner's continued detention is necessary to secure his appearance or to protect the public. Reasonable alternatives to detention—such as bond, supervision, or release on recognizance—could achieve the same ends.

80. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued detention and violates the INA.

COUNT II

Violation of the Bond Regulations

81. Petitioner incorporates by reference the allegations of fact set forth in preceding paragraphs.

82. In 1997, after Congress amended the INA through Illegal Immigration Reform and Immigrant Responsibility Act ("IIRIRA"), Executive Office for Immigration Review ("EOIR") and the then Immigration and Naturalization Service issued an interim rule to interpret and apply IIRIRA. Specifically, under the heading of "Apprehension, Custody, and Detention of [Noncitizens]," the agencies explained that "[d]espite being applicants for admission, [noncitizens]

who are present without having been admitted or paroled (formerly referred to as [noncitizens] who entered without inspection) will be eligible for bond and bond redetermination." 62 *Fed. Reg.* 68 at 10323 (April 9, 1997) (emphasis added). The agencies thus made clear that individuals who had entered without inspection were eligible for consideration for bond and bond hearings before IJs under 8 U.S.C. § 1226 and its implementing regulations.

83. Nonetheless, pursuant to *Matter of Yajure Hurtado,* EOIR has a policy and practice of applying § 1225(b)(2) to individuals like Petitioner.

84. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued detention and violates 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

COUNT III

Violation of Fifth Amendment Right to Due Process

85. Petitioner incorporates by reference all preceding paragraphs as if fully set forth herein.

86. The government may not deprive a person of life, liberty, or property without due process of law. U.S. Const. amend. V. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that the Clause protects." *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

87.[T]he Due Process Clause applies to all "persons" within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas*, 533 U.S. at 693. While certain constitutional protections

do not extend outside the "geographic borders" of the United States, "legal circumstances change" as soon as a noncitizen "enters the country." *Id.*

88. Petitioner has a fundamental interest in liberty and being free from official restraint.

89. The government's detention of Petitioner without an adequate bond redetermination hearing to determine whether he is a flight risk or danger to others violates his right to due process.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that the Court assume jurisdiction over this Petition and Complaint and grant the following relief:

a. Assume jurisdiction over this matter;

b. Order that Petitioner shall not be transferred outside the Middle District of Florida while this habeas petition is pending;

c. Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days;

d. Issue a Writ of Habeas Corpus requiring that Respondents release Petitioner or, in the alternative, provide Petitioner with a bond hearing pursuant to 8 U.S.C. § 1226(a) within seven days;

e. Declare that Petitioner's detention is unlawful;

f. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act ("EAJA"), as amended, 28 U.S.C. § 2412, and on any other basis justified under law; and

g. Grant any other and further relief that this Court deems just and proper.

Dated: February 2, 2026

Respectfully submitted,

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VERIFICATION PETITIONER PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Domilio Antonio Teran Perez, and submit this verification on his behalf. I hereby verify that the factual allegations made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: February 2, 2026

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