UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 26-CIV-20708-WILLIAMS

MAURICIO LOPEZ CARDONA,

Petitioner,

v.

CHARLES PARRA, et al.,

Respondents.
_____/

RESPONSE TO ORDER TO SHOW CAUSE AND PETITION FOR A WRIT OF HABEAS CORUPS UNDER 28 U.S.C. § 2241

Respondent,[1] through the undersigned Assistant United States Attorney, respectfully submits this Response to this Court's Order to Show Cause (ECF No. 7) and Petitioner Mauricio Lopez Cardona's Petition for Writ of Habeas Corpus Under 28 U.S.C. § 2241 (ECF No. 4) ("Petitioner" and the "Petition"). For the reasons set for below, this Court should dismiss the petition for lack of jurisdiction, or in the alternative deny the Petition on the merits.

[1] A writ of habeas corpus must "be directed to the person having custody of the person detained." 28 USC § 2243. In cases involving present physical confinement, the Supreme Court reaffirmed in *Rumsfeld v. Padilla*, 542 U.S. 426 (2004), that "the immediate custodian, not a supervisory official who exercises legal control, is the proper respondent." *Rumsfeld v. Padilla*, 542 U.S. 426, 439 (2004). Petitioner is currently detained at Krome Service Processing Center. *See* Exhibit D. Therefore, the proper respondent is Charles Parra, in his official capacity as the Assistant Field Office Director in charge of the Krome Service Processing Center. Respondent must all be dismissed as improper parties.

BACKGROUND

The petitioner, LOPEZ CARDONA (Petitioner), is a native and citizen of Colombia. *See*, Exh. A, Form I-213, Record of Deportable/Inadmissible Alien, (Form I-213) dated June 24, 2025; Exh. B, Form I-213 dated June 08, 2016; Exh. C, Form I-213 June 22, 2009.

On February 19, 2009, a grand jury in the U.S. District Court for the Southern District of New York indicted Petitioner on a single count of conspiracy to violate the narcotics laws of the United States by distributing cocaine. *See*, Exh. D, Criminal Records for case number: 09-cr-00156-PGG. On June 19, 2009, a Drug Enforcement Agency (DEA) charter flight brought Petitioner to the Westchester Airport in New York, and he was paroled into the United States for prosecution. *See*, Exh. C, Form I-213 June 22, 2009. Petitioner pled guilty to an eight-count superseding information which included the counts of: one count of conspiracy to import cocaine, five counts of murder in connection to narcotics trafficking, one count of conspiracy to obstruct justice, and one count of conspiracy to support a foreign terrorist organization. *See*, Exh. D, Criminal Records for case number: [redacted] On December 8, 2015, the district judge sentenced Petitioner to eight years in prison with credit for time served, followed by three years supervised release. *Id.* Petitioner had been in the Dominican Republic prior to his arrival in the United States. *See* Exh. C, Form I-213 June 22, 2009.

On June 07, 2016, Petitioner was released from prison and entered Immigration and Customs Enforcement (ICE) custody. *See* Exh. B, Form I-213 dated June 08, 2016. On June 08, 2016, ICE issued Petitioner a Notice to Appear (NTA) charging him as inadmissible to the United States pursuant to INA §: 212(a)(7)(B)(i)(II), as amended, as a nonimmigrant who is not in possession of a valid nonimmigrant visa or border crossing identification card at the time of application for admission; 212(a)(2)(A)(i)(II), as amended, as an alien who has been convicted

of, or who admits having committed, or who admits committing acts which constitute the essential elements of (or a conspiracy or attempt to violate) any law or regulation of a State, the United State, or a foreign country relating to a controlled substance (as defined in Section 102 of the Controlled Substances Act (21 U.S.C. 802)); 212(a)(2)(A)(i)(I), as amended, as an alien who has been convicted of, or who admits having committed, or who admits committing acts which constitute the essential elements of a crime involving moral turpitude (other than a purely political offense) or an attempt or conspiracy to commit such a crime. *See* Exh. E, Notice to Appear dated June 06, 2016.

On June 30, 2016, DHS filed Form I-261, Additional Charges of Inadmissibility/Deportability, charging Petitioner as inadmissible pursuant to INA § 212(a)(3)(B)(i)(I), as amended, as an alien who committed an act that the actor knows, or reasonably should know, affords material support, including a safe house, transportation, communications, funds, transfer of funds or other material financial benefit, false documentation or identification, weapons to a terrorist organization described in clause (vi)(I) or (II), or to any member of such an organization as described in Section 212(a)(3)(B)(iv)(VI)(cc) of the INA. *See* Exh. F, Form I-261, Additional Charges of Inadmissibility/Deportability dated June 30, 2016. On the same day, Petitioner filed written pleadings and the charges were sustained. *See*, Exh. G, Declaration of Deportation Officer Jurdi.

Petitioner applied for Withholding of Removal and Deferral under Convention Against Torture. *See*, Exh. G, Declaration of Deportation Officer Jurdi.

On August 24, 2016, the Immigration Judge ordered Petitioner removed to the Dominican Republic and, in the alternative, to Colombia. *See*, Exh. H, Immigration Judge Order dated

August 24, 2016. The Immigration Judge granted Petitioner's application for Deferral of Removal under the Torture Convention to Colombia. *Id.*

On April 10, 2017, Petitioner was released purusant to an Order of Supervision (OSUP). *See*, Exh. I, Form I-220B

On June 24, 2025, Petitioner reported to ICE ERO for his scheduled OSUP appointment and was taken into custody because ICE intends to effectuate his removal. *See*, Exh. A, Form I-213 dated June 24, 2025.

On July 07, 2025, Petitioner filed a motion to reopen his removal proceedings and a motion for stay of removal. *Id.* On July 09, 2025, the Immigration Court granted Petitioner's motion to reopen and took no action on the stay of removal. *See* Exh. J, Immigration Judge orders dated July 09, 2025 and July 10, 2025. DHS filed a motion to reconsider the immigration court's grant of Petitioner's motion to reopen. *See*, Exh. G, Declaration of Deportation Officer Jurdi. On July 22, 2025, the Immigration Court vacated its grant of the motion to reopen and reinstated Petitioner's removal order. *See* Exh. K, Immigration Judge order dated July 22, 2025. Petitioner remains subject to an order of removal. *See*, Exh. G, Declaration of Deportation Officer Jurdi.

On December 02, 2025, ICE ERO issued a Notice of Removal informing Petitioner that ICE intends to remove him to Mexico. See, Exh. L, Notice of Removal dated December 02, 2025. On December 03, 2025, the ERO field office was informed that Mexico will not accept the Petitioner. *See*, Exh. G, Declaration of Deportation Officer Jurdi.

ICE ERO revoked Petitioner's OSUP on February 06, 2026, pursuant to 8 C.F.R. § 241.13(i). *See*, Exh. M, Notice of OSUP revocation dated February 06, 2026. On the same day,

ICE ERO conducted an initial informal interview offering Petitioner an opportunity to respond to the reasons for revocation of his OSUP. *See*, Exh. G, Declaration of Deportation Officer Jonathan Carmona.

Petitioner's case has been elevated by the Removal Management Division, part of ICE HQ, for consideration of his removal pursuant to a third-country removal agreement. *See*, Exh. G, Declaration of Deportation Officer Jurdi. These agreements are negotiated on behalf of the Department of State and ICE does not have insight into this process. *Id.* When new agreements are negotiated, the Department of State alerts DHS and the Removal Management Division identifies applicable aliens based on the agreement's nominating criteria. *Id.* ICE is regularly conducting third-country removals pursuant to this process. *Id.*

Once the alien has been identified for potential removal pursuant to a third-country removal agreement, DHS will follow the Secretary's March 30th Guidance for Third Country Removals. *Id.*

Petitioner remains in ICE ERO custody at the Krome North Service Processing Center in Miami, Florida. *See* Exh. N, Detention History.

ARGUMENT

Petitioner raises two claims. First, Petitioner alleges that the revocation of his OSUP was unlawful because Respondents "did not follow the procedures set forth in 8 C.F.R. § 241.4(l) when they revoked his release and re-detained him." ECF No. 4 at 6. Second, he alleges that he has been in custody for seven months, his removal is "not likely to occur in the foreseeable future" and that his continued detention violates his Constitutional due process

rights. *Id.* at 8. This Court lacks jurisdiction as to both claims and should, therefore, dismiss for lack of jurisdiction. In the alternative, this Court should deny the Petition on the merits.

I. This Court Lacks Jurisdiction Over Petitioner's Claims.

"Federal courts are courts of limited jurisdiction." *Kokkonen v. Guardian Life Ins. Co. of Am.*, 511 U.S. 375, 377 (1994) (citation omitted); *see also Johansen v. Combustion Eng'g, Inc.*, 170 F.3d 1320, 1328 n.4 (11th Cir. 1999) ("A federal court not only has the power but also the obligation at any time to inquire into jurisdiction whenever the possibility that jurisdiction does not exist arises."). For these reasons, before this Court can proceed, it must determine whether it has jurisdiction over this action. *See Resnick v. AvMed, Inc.*, 693 F.3d 1317, 1323 (11th Cir. 2012) ("Prior to making an adjudication on the merits, we must assure ourselves that we have jurisdiction to hear the case before us.").

A. Congress Stripped this Court of Jurisdiction to Prevent the Execution of Removal Orders.

Petitioner is, in essence, asking this Court to prevent ICE from executing his removal order by ordering his immediate release (ECF No. 4 at 21 ("The petitioner respectfully requests that this Court . . . direct[] the respondents to immediately release him from custody"). This Court, however, lacks jurisdiction to grant such relief.

Federal law precludes a district court from interfering with the government's decision or action to execute orders of removal. 8 U.S.C. § 1252(g). Section 1252(g) specifically states that "no court shall have jurisdiction to hear any cause or claim by … any alien arising from the decision or action by [ICE] to … execute removal orders against any alien.' 8 USC § 1252(g). This provision applies "notwithstanding any other provision of law (statutory or nonstatutory), including section 2241 of Title 28, or any other habeas corpus provision." *Id.*

The Eleventh Circuit has explained that "[s]ection 1252(g) bars review over 'any' challenge to the execution of a removal order – and makes no exception for those claiming to challenge the government's 'authority' to execute their removal orders." *Camarena v. Dir., Immigr. & Customs Enf't*, 988 F.3d 1268, 1273 (11th Cir. 2021) (holding that where there is challenge to the validity of a removal order, district courts lack jurisdiction to hear any "cause or claim brought by an alien arising from the government's decision to execute a removal order"). The petitioners in *Camarana* were in virtually identical situations as the one Petitioner finds himself in, in that (a) they did not challenge their orders of removal, (b) remained in the United States via an order of supervision, and (c) filed habeas petitions after DHS attempted to execute orders of removals. Under these circumstances, the Eleventh Circuit found that the district court lacked jurisdiction to grant relief because Section 1252(g) strips courts of jurisdiction to prevent the execution of removal orders. *Id.* at 1272-73.

Here, like the petitioners in *Camarana*, Petitioner does not challenge the validity or existence of the order of removal. Instead, he argues that Petitioner's re-detention was unlawful, and he requests immediate release from detention. Section 1252(g), as interpreted by the Eleventh Circuit in *Camarana*, deprives this Court of jurisdiction to grant such relief. *See also Rivera-Amador v. Rhoden*, Case No. 3:25-CV-1460-WWB-SJH, 2025 WL 3687452, at *3 (M.D. Fla. Dec. 19. 2025) (holding that Section 1252(g) "divests the Court of jurisdiction" from enjoining respondents from detaining and deporting petitioner subject to a removal order); *Mapoy v. Carroll*, 185 F.3d 224, 230 (4th Cir. 1999) (holding that district court lacked jurisdiction to hear a challenge to execution of order of deportation pursuant to § 1252(g)); *Barrios v. Ripa*, No. 1:25-CV-22644, 2025 WL 2280485, at *3 (S.D. Fla. Aug. 8, 2025) ("The

Court finds that § 1252(g) deprives it of subject-matter jurisdiction over Respondent's decision to revoke the OSUP…").

In summary, Congress divested this Court of jurisdiction to prevent the execution of removal orders, meaning it should dismiss the Petition for lack of jurisdiction.

B. The Habeas Statute Does Not Provide Jurisdiction Over OSUP Claims.

As to Petitioner's OSUP claim, Petitioner invokes this Court's jurisdiction *only* pursuant to 28 U.S.C. § 2241, a statute that, by its plain language, permits courts to rule on claims related to an "applicant's commitment or detention." 28 U.S.C. § 2241. The clear language of the statute and "the common-law history of the writ" showed that "the essence of habeas corpus is an attack by a person in custody upon the legality of that custody, and that the traditional function of the writ is to secure release from illegal custody." *Alawieh v. Tweedie*, Case No. 25-10614-LTS, 2025 WL 3171170, at *3 (D. Mass. 2025), *appeal docketed*, No. 25-2238 (1st Cir. Dec. 31, 2025) (quoting *Preiser v. Rodriguez*, 411 U.S. 475 (1973)) (citing *Munaf v. Geren*, 553 U.S. 674, 693 (2008)). If a "petitioner seeks relief that 'falls outside the scope of the writ as it was understood when the Constitution was adopted,' [those] claims are beyond the reach of a federal court's habeas jurisdiction." *Id.* (quoting *Dep't of Homeland Sec. v. Thuraissigiam*, 591 U.S. 103, 119 (2020)). Thus, to prevail, Petitioner must show that the alleged violations that he claims, based on the factual predicate that he alleges, fall within the reach of this Court's ability to grant habeas relief. *See, generally, Mayers v. U.S. Dept. of I.N.S.*, 175 F.3d 1289, 1300 (11th Cir. 1999) (describing how in *United States ex rel. Accardi v. Shaughnessy,* 347 U.S. 260, 265, 268, (1954), the Supreme Court explained that the "crucial question is whether the alleged conduct . . . deprived petitioner of any of the rights guaranteed [to] him by the statute or by the regulation issued pursuant thereto.").

In this case, Petitioner cannot do so. As a district court recently observed, "While some procedural violations may, in some circumstances, rise to the level of a due process violation," not all alleged violations "rise to the level of a due process violation and/or would independently entitle [a petitioner] to a grant of habeas relief in the form of release from detention." *Van v. Oddo*, Case No. 3:25-CV-00322, 2025 WL 3492736, at *4 (W.D. Pa., Dec. 5, 2025) (finding no habeas relief for alleged failures to provide notice for reasons of revocation and lack of "informal review"). This is particularly true in this case where Petitioner alleges technical violations that can easily be cured. Specifically, Petitioner claims that Respondent failed to give Petitioner "any notification of the reason(s) for revocation of his release and his re-detention" or "that the purposes of release have been served or that his present re-detention is necessary to enforce the removal order." These claims, too, could be readily resolved, meaning the alleged violation does not rise to a level of a constitutional claim. *See, e.g., Van v. Oddo*, 2025 WL 3492736 at *4 (finding no violation). For these reasons, Petitioner's reliance on technical violations of internal policies do not relate to Petitioner's "commitment or detention" and do not rise to a Constitutional or statutory violation warranting habeas relief. *Id.*[2]

II. On the Merits, the Revocation of Petitioner's OSUP Comports with Applicable Regulations and the Constitution.

[2] Some opinions from this District found that this Court has jurisdiction, rejecting arguments related only to the jurisdiction-stripping provision in 8 U.S.C. § 1252. *See, e.g., Espinoza-Sorto v. Aguedlo et al.*, Case No. 25-CV-23201-DLG (DE 26); *Grigorian v. Bondi*, Case No. 25-CV-22914-RAR, 2025 WL 1895479, at *3 (S.D. Fla., July 8, 2025).

If this Court finds that it has jurisdiction, it should nonetheless deny the Petition on the merits because Petitioner's claim that his detention violates his Constitutional rights lacks merit. To the contrary, Petitioner – who is subject to a final order of removal – is being lawfully detained, pursuant to 8 U.S.C. § 1231(a)(6), and his allegations that his removal is not reasonably foreseeable lacks merit. For these reasons, this Court should deny the Petition.

Petitioner argues that his detention is unlawful because, "respondents did not follow the procedures set forth in 8 C.F.R. § 241.4(l) when they revoked his release and re-detained him" (ECF No. 4 at 15).[3] This claim lacks merit because DHS complied with the statutory and regulatory requirements in revoking Petitioner's order of supervision and has provided Petitioner notice, an informal interview, and an opportunity to address the reasons for the revocation.

Although the applicable statute, 8 U.S.C. § 1231(a)(3), is silent as to revocation procedures for an individual released pursuant to an Order of Supervision, ICE has issued Post-Order Custody Regulations ("POCR") (*see* 8 C.F.R. §§ 241.4, 241.13) describing the mechanisms for custody reviews, release from ICE custody, and revocation of release for individuals with final orders of removal. The specific regulatory provisions concerning revocation of release are contained at 8 C.F.R. § 241.4(l), 241.13(i) and provide significant discretion to ICE to revoke release. *See Leybinsky v. U.S. Immigr. & Customs Enf't,* 553 F. App'x 108, 110 (2d Cir. 2014) (noting the "broad discretionary authority the regulation grants ICE" to revoke release); *Rodriguez v. Hayes*, 591 F.3d 1105, 1117 (9th Cir. 2010) (explaining that while the revocation regulation "provides the detainee some opportunity to respond to the

[3] Although Petitioner cites 8 C.F.R. § 241.4(l), 8 C.F.R. § 241.13 additionally applies and governs "[d]etermination of whether there is a significant likelihood of removing a detained alien in the reasonably foreseeable future."

reasons for revocation, it provides no other procedural and no meaningful substantive limit on this exercise of discretion ...."). For example, the regulations authorize revocation when the alien violates any of the conditions of release or "on account of changed circumstances, the [Agency] determines that there is a significant likelihood that the alien may be removed in the reasonably foreseeable future." 8 C.F.R. § 241.13(i)(1), (2). .

The regulations require that, when ICE revokes release of an individual, pursuant to 8 C.F.R. § 241.13(i)(3), ICE must conduct an "informal interview" to advise the individual of the basis for revocation and must also serve the individual with a written notice of revocation. *Id.* If ICE determines revocation remains appropriate after conducting the informal interview, then the alien may submit a request for review of his detention six months after ICE's last denial of release. 8 C.F.R. § 241.13(j). The regulations further provide that "[t]he alien may be continued in detention for an additional six months in order to effect the alien's removal, if possible, and to effect the conditions under which the alien had been released." *Id.* at § *24*1.13(i)(2)

A. ICE complied with the POCR Regulations to Arrest Petitioner.

ICE ERO revoked Petitioner's OSUP on February 06, 2026, pursuant to 8 C.F.R. § 241.13(i). *See*, Exh. M, Notice of OSUP revocation dated February 06, 2026. On the same day, ICE ERO conducted an initial informal interview offering Petitioner an opportunity to respond to the reasons for revocation of his OSUP. *See*, Exh. G, Declaration of Deportation Officer Jonathan Carmona. In revoking Petitioner's supervised release, ICE complied with the regulation that allows revocation when ICE determines that it "is appropriate to enforce a removal order . . . against an alien" and when ICE finds that the "purposes of release have been served." 8 C.F.R. § 241.4(l)(2).

The regulation provides a "short and straight path for immigrants whom the government is ready and able to remove." *Alam v. Nielsen*, 312 F. Supp. 3d 574, 582 (S.D. Tex. 2018). As such, ICE has ample justification per its regulation to revoke release. *See Grigorian v. Bondi*, No. 25-CV-22914-RAR, 2025 WL 2604573, at *5 (S.D. Fla. Sept. 9, 2025) (holding that § 241.4(l) provides government has "extraordinarily broad discretion to revoke an OSUP" under similar circumstances); *Barrios*, 2025 WL 2280485, at *4 (noting the broad discretion afforded to revoke an OSUP when effectuating an order of removal and that such a decision is not subject to judicial review under §1252(g)). Courts routinely conclude that compliance with the POCR regulations protect an individual's constitutional rights while detained while executing a removal order. *See, e.g.*, *Moses v. Lynch*, No. 15-cv-4168, 2016 WL 2636352, at *4 (D. Minn. Apr. 12, 2016) ("When immigration officials reach continued-custody decisions for aliens who have been ordered removed according to the custody-review procedures established in the Code of Federal Regulations, such aliens receive the process that is constitutionally required."); *Portillo v. Decker*, No. 21-cv-9506 (PAE), 2022 WL 826941, at *6 (S.D.N.Y. Mar. 18, 2022) (collecting cases supporting the conclusion that the POCR framework has routinely been deemed constitutional and noting that petitioner had not "cite[d] legal authority in support of his generalized laments about the administrative process").

Because Petitioner cannot establish that ICE acted arbitrarily in revoking his OSUP, his argument fails, and this Court should deny the Petition. *See, e.g.*, *Perez v. Berg*, No. 24-cv-3251 (PAM/SGE), 2025 WL 566884, at *7 (D. Minn. Jan. 6, 2025), *report and recommendation adopted,* No. 24-cv-3251 (PAM/ECW), 2025 WL 566321 (D. Minn. Feb. 20, 2025) (finding no due process violation "[a]bsent an indication that ICE failed to comply with its regulatory

obligations in some more specific way"); *Doe*, 2018 WL 4696748, at *7 (dismissing habeas claim where "there was no regulatory violation" in connection with custody reviews).

III. Petitioner's Continued Detention Does Not Violate his Constitutional Rights

Petitioner is subject to a final order of removal and is being lawfully detained, pursuant to 8 U.S.C. § 1231(a)(6). His allegation that his removal is not reasonably foreseeable lacks merit.

A. ICE Lawfully Detained Petitioner Pursuant to 8 U.S.C. § 1231.

Section 241 of the Immigration and Nationality Act (8 U.S.C. § 1231) states, "when an alien is ordered removed, the Attorney General shall remove the alien from the United States within a period of 90 days." 8 U.S.C. § 1231 (a)(1)(A). That period is called the "removal period," and the Attorney General must detain the alien during the "removal period". 8 U.S.C. § 1231(a)(2)(A). The removal period is "extended beyond a period of 90 days and the alien may remain in detention during such extended period if the alien fails or refuses to make timely application in good faith for travel or other documents necessary to the alien's departure or conspires or acts to prevent the alien's removal subject to an order of removal." 8 U.S.C. § 1231(a)(1)(C).

In *Zadvydas v. Davis*, the Supreme Court held that an alien subject to a final removal order may be detained beyond § 1231's 90-day removal period for an additional period "reasonably necessary to secure removal." 533 U.S. 678, 699 (2001). Such detention is "presumptively reasonable" for six months. Id. at 701. However, "[t]his 6–month presumption . . . does not mean that every alien not removed must be released after six months." *Id.* Rather, an alien, such as Petitioner, "may be held in confinement until it has

been determined that there is no significant likelihood of removal in the reasonably foreseeable future." *Id.*

In *Akinwale v. Ashcroft*, 287 F.3d 1050 (11th Cir. 2002), the Eleventh Circuit held that in order to state a claim under *Zadvydas*, "the [alien] not only must show post removal order detention in excess of six months, but also must provide evidence of a good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future." 287 F.3d at 1052. To do so, a petitioner cannot merely rest on his own conclusory assertions—actual proof or evidence is needed. *Akinwale*, 287 F.3d at 1052 ("[T]o state a claim under *Zadvydas* the alien . . . must provide evidence of a good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future."). Where an alien cannot meet his burden of establishing that there is not a substantial likelihood of removal in the reasonably foreseeable future, a petition for habeas corpus should be dismissed. *See, e.g., Oladokun v. U.S. Atty. Gen.*, 479 F. App'x 895, 897 (11th Cir. 2012); *Akinwale*, 287 F.3d at 1052.

This Court should deny Petitioner's Constitutional challenge because he has not met his burden of proving that his removal is not reasonably foreseeable. *Callender v. Shanahan*, 281 F. Supp. 3d 428, 434 (S.D.N.Y. 2017) (describing how *Zadvydas* "places an initial burden on the detainee" to establish that the "no significant likelihood" standard has been met). The Petition failed to include nonspeculative assertions that his removal is not reasonably foreseeable, meaning Petitioner has not met his burden. *Callender*, 281 F. Supp. 3d at 434–35 (holding that petitioner must present more than "mere assertions that removal is unforeseeable").

CONCLUSION

For all these reasons, should dismiss the Petition for lack of jurisdiction or deny it on the merits.

Dated: February 9, 2026

Respectfully submitted,

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