

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE THE PETITION FOR WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241**

PETITION FOR WRIT OF HABEAS CORPUS

Petitioner, through his duly authorized Next Friend, respectfully petitions this Honorable Court for the issuance of a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, challenging the unconstitutional and unlawful detention by Immigration and Customs Enforcement (ICE).

I. PARTIES

DETAINEE:

Name: Christopher Jahir Pérez Velásquez

A-Number: 

Date of Birth: 

Nationality: Honduran

Date of Entry: May 15, 2023

Date of Detention: December 27, 2025

Current Facility: Moshannon Valley ICE Processing Center

Address: 555 GEO Drive, Philipsburg, PA 16866

**FILED
SCRANTON**

FEB 09 2026

PER DJ
DEPUTY CLERK

NEXT FRIEND:

Name: Natalie Maria Munoz

Citizenship: United States Citizen

Date of Birth: 



II. JURISDICTION AND VENUE

This Court has jurisdiction pursuant to 28 U.S.C. § 2241, as Petitioner is in federal custody within

the Middle District of Pennsylvania. Venue is proper as the immediate custodian exercises control over Petitioner within this District.

III. STATEMENT OF FACTS

Petitioner was unlawfully stopped while driving by local police acting in concert with ICE agents, without probable cause, warrant, or any criminal activity. He was handcuffed, removed from his vehicle, and directly transferred to ICE custody.

IV. CONDITIONS OF CONFINEMENT

Petitioner has suffered severe medical neglect, including throat injuries with bleeding from the mouth, for which adequate medical care has been denied. He has endured food and water rationing, extreme overcrowding, racial harassment, xenophobic verbal abuse, and emotional trauma.

V. DENIAL OF DUE PROCESS

Petitioner has been denied access to legal resources and assistance, preventing him from meaningfully representing himself pro se. Such denial violates the Fifth Amendment Due Process Clause.

VI. LEGAL ARGUMENTS

- A. Unlawful Seizure – Fourth Amendment
- B. Due Process Violations – Fifth Amendment
- C. Cruel and Unusual Punishment – Eighth Amendment
- D. Medical Neglect – *Estelle v. Gamble*, 429 U.S. 97 (1976)
- E. Prolonged Detention – *Zadvydas v. Davis*, 533 U.S. 678 (2001)
- F. Bond and Liberty Interests – *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018)
- G. Immediate Custodian Rule – *Rumsfeld v. Padilla*, 542 U.S. 426 (2004)

VII. REQUEST FOR RELIEF

Petitioner respectfully requests that this Court:

1. Issue the Writ of Habeas Corpus;
2. Order immediate release or a bond hearing;
3. Order adequate medical treatment;
4. Enjoin further unconstitutional conduct;
5. Grant any further relief deemed just and proper.

VIII. VERIFICATION

I, Natalie María Muñoz, as Next Friend, declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.



Natalie María Muñoz
Next Friend for Christopher Jahir Pérez Velásquez
Date: 2-2-26

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: CHRISTOPHER JAHIR PÉREZ VELÁSQUEZ

[REDACTED]

PROOF OF SERVICE

I, Natalie Maria Munoz, Date of Birth: November 1, 2005, hereby certify under penalty of perjury that on the date indicated below, I served a true and correct copy of the following documents:

- Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241
- Emergency Motion for Immediate Release
- Emergency Motion to Expedite Habeas Corpus Proceedings
- Affidavit of Next Friend
- All accompanying exhibits and attachments

SERVICE WAS MADE AS FOLLOWS:

I. COURT SERVICE

Clerk of Court
United States District Court
Middle District of Pennsylvania
William J. Nealon Federal Building and U.S. Courthouse
235 North Washington Avenue
Scranton, PA 18503

Method of Service: U.S. Mail / Express Mail
Date of Service: 2-2-26

II. RESPONDENTS SERVICE

Office of the United States Attorney

Middle District of Pennsylvania
228 Walnut Street, P.O. Box 11754
220 Federal Building and Courthouse
Harrisburg, PA 17108

Method of Service: U.S. Mail / Certified Mail

Date of Service: 2-2-26

III. ICE / DHS SERVICE

Office of the Chief Counsel
U.S. Immigration and Customs Enforcement (ICE)
Middle District of Pennsylvania
100 Chestnut Street, Suite 215
Harrisburg, PA 17101

Method of Service: U.S. Mail

Date of Service: 2-2-26

IV. DETENTION FACILITY SERVICE

Warden
Moshannon Valley ICE Processing Center
555 GEO Drive
Philipsburg, PA 16866

Method of Service: U.S. Mail

Date of Service: 2-2-26


DECLARATION

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on this 2 day of 2, 2026.

Natalie Munoz

Natalie Maria Munoz

Date of Birth: 

Next Friend for Christopher Jahir Pérez Velásquez

