

FILED BY LSA D.C.  
FEB - 9 2026  
ANGELA E. FOGLE  
CLERK U.S. DIST. CT  
S. D. OF FLA. - MIAMI

**PETITION FOR WRIT OF HABEAS CORPUS**  
28 U.S.C. § 2241 – Immigration Detention (ICE)

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
MIAMI DIVISION**

**FÉLIX MUSTELIER ZAMBRANO**

A-Number: 

v.

WARDEN / DIRECTOR, ALLIGATOR ALCATRAZ DETENTION FACILITY (MIAMI, FLORIDA)  
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE)  
DEPARTMENT OF HOMELAND SECURITY (DHS)

**I. JURISDICTION**

*This Court has jurisdiction pursuant to 28 U.S.C. § 2241 because Petitioner is in federal ICE custody within this judicial district.*

**II. PETITIONER INFORMATION**

Name: Félix Mustelier Zambrano

A-Number: 

Detention Facility: Alligator Alcatraz Detention Facility, Miami, Florida

Date of ICE Detention: November 19, 2025

**III. ALLEGATIONS**

1. Petitioner is in ICE custody at the Alligator Alcatraz Detention Facility in Miami, Florida, within the jurisdiction of this Court.
2. On November 19, 2025, Petitioner voluntarily appeared for his scheduled ICE check-in.
3. Despite voluntary compliance, ICE detained Petitioner without explanation or written notice.
4. Petitioner has been subject to a final order of removal since 2016; however, such order does not authorize prolonged detention without due process.
5. Since November 19, 2025, Petitioner has remained detained without a bond hearing or meaningful custody review.
6. ICE has not demonstrated that Petitioner is a flight risk or a danger to the community.
7. ICE has failed to show that Petitioner's removal is reasonably foreseeable.
8. Petitioner's detention is prolonged, arbitrary, and punitive.
9. ICE's actions violate the Due Process Clause of the Fifth Amendment.
10. Immediate judicial intervention is required to prevent continued unlawful detention.


**IV. LEGAL ARGUMENT**

Prolonged immigration detention without a bond hearing or meaningful judicial review violates the Due Process Clause of the Fifth Amendment, even where a final order of removal exists. Petitioner's continued detention is not reasonably related to effectuating removal and is therefore unconstitutional.

**V. RELIEF REQUESTED**

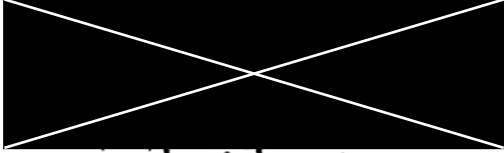
Petitioner respectfully requests that this Court issue a Writ of Habeas Corpus, declare the detention unconstitutional, and order immediate release or, in the alternative, an immediate bond hearing where the Government bears the burden of proof.

**VI. DECLARATION UNDER PENALTY OF PERJURY**

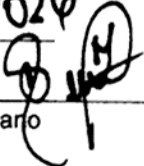
I, Yaneysi Mustelier Zambrano, sister of the Petitioner and a United States citizen (DOB: 

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

Address:



Date: 02/04/2026

Signature:  \_\_\_\_\_  
Yaneysi Mustelier Zambrano