

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

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Sebastian Repela
Petitioner, pro se

v.

ICE FIELD OFFICE DIRECTOR – DENVER FIELD OFFICE,
Respondent.

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

I. JURISDICTION

This Court has jurisdiction pursuant to 28 U.S.C. § 2241.
Petitioner is currently detained at the ICE Detention Facility in Aurora, Colorado.

II. FACTS

Petitioner lawfully entered the United States on a B-2 tourist visa.

Petitioner was held approximately four months in Charlotte County Jail, Florida,
based on false criminal allegations that were later dismissed in full.

Petitioner was held approximately one month in ICE detention in Alligator
Alcatraz, Florida.

Petitioner was subsequently transferred to ICE detention in Aurora, Colorado,
where he has been detained for approximately two additional months.

Petitioner has now been continuously detained for approximately seven months.
Petitioner has not received a constitutionally adequate bond hearing.

III. CLAIMS

A. Prolonged Civil Detention Without Bond Hearing

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO

FEB 11 2026

JEFFREY P. COLWELL
CLERK

Petitioner's detention has become prolonged and indefinite in nature. Civil immigration detention without an individualized bond hearing violates the Due Process Clause of the Fifth Amendment.

B. Due Process Violations

Petitioner has been deprived of liberty without a meaningful opportunity to challenge his detention. The absence of a bond hearing, combined with the length of detention and lack of flight risk or danger, renders the detention unconstitutional.

C. Lack of Government Justification

The Government has failed to demonstrate that continued detention is necessary to serve a legitimate governmental interest. Petitioner is neither a danger to the community nor a flight risk.

IV. RELIEF REQUESTED

Petitioner respectfully requests immediate release or, in the alternative, a prompt bond hearing.

DECLARATION

I declare under penalty of perjury that the foregoing is true and correct.

Sebastian Repela

Petitioner, pro se

A# ~~XXXXXXXXXX~~

Date: 2/7/2020

Sebastian Repela

CERTIFICATE OF SERVICE

I hereby certify that on 2/7/2020 a true and correct copy of the following documents:

- PETITION FOR WRIT OF HABEAS CORPUS

was served upon the **Department of Homeland Security, Office of Chief Counsel**, by hand delivery at the following address:

**Department of Homeland Security
Office of the Chief Counsel
Aurora Immigration Court
3130 North Oakland Street
Aurora, CO 80010
United States**

Respectfully submitted,

Sebastian Repela
Respondent, Pro Se

A#



Date: 2/7/2020