

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

LORENZO PEREZ HERNANDEZ,  
A# [REDACTED]

Pro Se Petitioner, currently detained at  
Broward Transitional Center,  
Pompano Beach, Florida.

Petitioner,

v.

PAM BONDI,  
Attorney General of the United States;

KRISTI NOEM, SECRETARY,  
U.S. Department of Homeland Security (DHS);

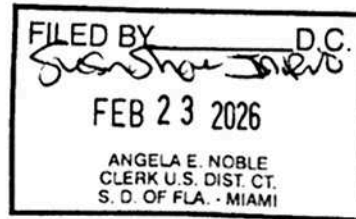
TODD M. LYONS,  
Acting Director, U.S. Immigration and Customs Enforcement (ICE);

GARRETT J. RIPPA,  
Field Office Director, ICE Enforcement and Removal Operations (ERO),  
Miami Field Office;

WARDEN/FACILITY ADMINISTRATOR,  
Broward Transitional Center;

AND ALL OTHER PERSONS HAVING CUSTODY OF PETITIONER,

Respondents.



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

**TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF FLORIDA:**

PETITIONER, LORENZO PEREZ HERNANDEZ, appearing pro se, respectfully petitions this Honorable Court for a Writ of Habeas Corpus pursuant to Title 28 U.S.C. § 2241, challenging the legality and constitutionality of his civil immigration detention by the United

States Department of Homeland Security (DHS) and U.S. Immigration and Customs Enforcement (ICE), and in support thereof Petitioner proffers the following facts and evidence.

### **I. INFORMATION ABOUT PETITIONER**

1. Petitioner's name is: LORENZO PEREZ HERNANDEZ.
2. Petitioner's Alien Registration Number is: A# 
3. Petitioner is a native, citizen and national of Mexico.
4. Petitioner was born on  in Mexico. A copy of Petitioner's Mexican passport is attached hereto as **Exhibit A**.
5. Petitioner entered the United States in or about 2004.
6. Petitioner is currently detained at Broward Transitional Center, Pompano Beach, Florida.
7. Petitioner was taken into ICE custody on or about January 15, 2026.
8. Petitioner has continuously resided in the United States for over twenty-two years.
9. Petitioner has a pending I-589, Application for Asylum and for Withholding of Removal with USCIS is attached hereto as **Exhibit B**.
10. Petitioner has prior minor offenses, including a conviction for driving without a valid license and a possession of cannabis matter, both of which have been resolved and are now closed. See **Exhibit C**.
11. Petitioner has strong family and community ties in the United States, including close relatives and long-term friendships. Petitioner has one (1) U.S.-born child, birth certificate and U.S. passport attached as **Exhibit D**.
12. Petitioner has letters of good moral character and community support attached as **Exhibit E**.
13. Immigration bond denial notice attached as **Exhibit F**.

### **II. JURISDICTION AND VENUE**

14. This Court has subject-matter jurisdiction over this Petition pursuant to 28 U.S.C. § 2241 because Petitioner is in custody under the authority of the United States and challenges the legality of her civil immigration detention as contrary to the Constitution and laws of the United States.

15. Venue is proper in this Court because Petitioner is detained within the Southern District of Florida, Fort Lauderdale Division, at Broward Transitional Center.

16. Petitioner is not seeking review of a final order of removal. Petitioner challenges the lawfulness of his present detention and the lack of adequate procedural safeguards required by due process.

### **III. PARTIES**

17. Petitioner LORENZO PEREZ HERNANDEZ is currently detained at Broward Transitional Center, 3900 N. Powerline Rd, Pompano Beach, FL 33073.

18. Respondent Pam Bondi is the Attorney General of the United States and is responsible for the general enforcement of federal immigration laws.

19. Respondent Kristi Noem is the Secretary of DHS, responsible for administering and enforcing immigration laws and policies.

20. Respondent Todd M. Lyons is the Acting Director of ICE, the DHS component responsible for Petitioner's detention.

21. Respondent Garrett J. Ripa is the Field Office Director for ICE ERO's Miami Field Office, responsible for ERO operations in Florida, including detention decisions affecting Petitioner.

22. The Warden/Facility Administrator of Broward Transitional Center, 3900 N. Powerline Rd, Pompano Beach, FL 33073, is Petitioner's immediate custodian and has day-to-day control over Petitioner's confinement.

23. All other people having custody of Petitioner are proper Respondents to the instant habeas Petition.

### **IV. FACTUAL BACKGROUND**

24. Petitioner has lived in the United States for over a year and has built deep ties to this community.

25. Petitioner has a steady work history, demonstrating stability and reliability.

27. Petitioner has minor prior convictions for driving without a valid license and possession of cannabis, both of which are closed matters, and does not currently pose a danger to the community.

28. ICE has continued to detain Petitioner at the Broward Transitional Center, 3900 N. Powerline Rd, Pompano Beach, FL 33073, without a meaningful opportunity for an individualized release (or custody) determination on a record that accounts for his strong equities, strong and lengthy ties to the community, and lack of dangerousness.

29. Petitioner is not a flight risk. He has substantial ties to the United States, including family, employment, and he is willing to comply with any and all necessary conditions of release, including but not limited to electronic monitoring, house arrest, and any other alternatives to detention that the Court deems meet, just and necessary to assure his presence in Court.

#### **V. LEGAL FRAMEWORK**

30. The Fifth Amendment to the United States Constitution guarantees that no person shall be deprived of liberty without due process of law.

31. Civil immigration detention must be reasonable in duration and accompanied by adequate procedural safeguards, including—where appropriate—an individualized custody determination.

32. Prolonged or arbitrary detention without a meaningful opportunity to be heard violates due process.

33. Federal courts have authority under 28 U.S.C. § 2241 to review the legality of immigration detention and to order appropriate relief, including an individualized bond/custody hearing or release under conditions.

#### **VI. CLAIMS FOR RELIEF**

##### **COUNT ONE – VIOLATION OF DUE PROCESS: UNLAWFUL/ARBITRARY DETENTION WHERE RELEASE ON CONDITIONS IS REQUIRED**

34. Petitioner re-alleges and incorporates by reference the preceding paragraphs as though fully set forth herein.

35. Petitioner is held in civil immigration detention without a meaningful, individualized custody determination that accounts for her strong ties, lack of criminal convictions, and the availability of conditions of release.

36. Continued detention under these circumstances is excessive, arbitrary, and not narrowly tailored to any legitimate governmental interest, in violation of the Due Process Clause of the Fifth Amendment.

##### **COUNT TWO – VIOLATION OF DUE PROCESS: ARBITRARY ARREST AND DETENTION WITHOUT JUDICIAL WARRANT**

37. Petitioner re-alleges and incorporates by reference the preceding paragraphs as though fully set forth herein.

38. Petitioner was taken into ICE custody and detained without presentation of a judicial warrant or probable-cause determination by a neutral magistrate.

39. Under the circumstances of this case, the arrest and continued detention are arbitrary and violate fundamental principles of due process.

**COUNT THREE – VIOLATION OF DUE PROCESS: FAILURE TO CONSIDER LESS RESTRICTIVE ALTERNATIVES TO DETENTION**

40. Petitioner re-alleges and incorporates by reference the preceding paragraphs as though fully set forth herein.

41. Even if the government asserts concerns about appearance or supervision, less restrictive alternatives to detention (including reporting requirements, electronic monitoring, or other conditions) are available and adequate in light of Petitioner's circumstances.


42. Respondents' continued detention of Petitioner without adequate consideration of alternatives violates due process.

**VII. REQUEST FOR RELIEF**

WHEREFORE, Petitioner **LORENZO PEREZ HERNANDEZ**, respectfully requests that this Honorable Court to:

- A. Assume jurisdiction over this matter;
- B. Declare that Petitioner's continued civil immigration detention without a meaningful individualized custody determination violates the Due Process Clause of the Fifth Amendment;
- C. Order Respondents to release Petitioner from custody forthwith under reasonable conditions of supervision or on a reasonable bond set by this Court (or, in the alternative, order a prompt individualized custody/bond hearing before a neutral decision-maker if the Court concludes such a hearing is the minimum necessary remedy);
- D. In the alternative, order any other relief necessary to secure Petitioner's prompt release, including a prompt individualized custody/bond hearing if required by law;
- E. Grant such other and further relief as the Court deems just and proper.

**VIII. VERIFICATION**

I, **LORENZO PEREZ HERNANDEZ**, with alien number  declare under penalty of perjury under the laws of the United States of America that the foregoing facts are true and correct to the best of my knowledge, information, and belief.

Respectfully submitted,

Lorenzo Perez Hernandez  
**LORENZO PEREZ HERNANDEZ** (Pro Se)

A# 

Broward Transitional Center  
3900 N. Powerline Rd,  
Pompano Beach, FL 33073

Date: February 19, 2026

**EXPLANATORY LETTER FROM THE PETITIONER  
(Re: Habeas Corpus – LORENZO PEREZ HERNANDEZ)**

**LORENZO PEREZ HERNANDEZ** (Pro Se)

A# 

Broward Transitional Center

3900 N. Powerline Rd,

Pompano Beach, FL 33073

Date: February 19, 2026

**TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA:**

Your Honor,

My name is **LORENZO PEREZ HERNANDEZ**, and I am respectfully writing this letter in support of my Petition for Writ of Habeas Corpus. I am detained at Broward Transitional Center. I respectfully ask the Court to review my situation and order my prompt release under reasonable conditions or on a reasonable bond. If the Court concludes a hearing is required first, then I respectfully request an immediate individualized custody/bond hearing.

I have lived in the United States for over twenty-two years. I have strong ties to my community, including family members and long-term friends. I have one (1) U.S.-born child, to which I provide emotional and financial support. I have maintained steady employment.

I have a pending I-589, Application for Asylum and for Withholding of Removal with USCIS, I have stable support and will comply with all requirements. My prior minor offenses that have been resolved. My supporters have provided letters describing my good moral character and my community ties.

Because of my strong community ties, and the support available to me, I am not a danger to the community, and I am not a flight risk. I am willing to comply with any conditions of release, including reporting, electronic monitoring, or any other alternatives to detention that the Court believes appropriate.

For these reasons, I respectfully request:

1. That the Court order ICE to provide me with an immediate bond or custody hearing; OR
2. That the Court order my release under reasonable conditions of supervision or bond.

Thank you for your time and consideration.

Respectfully submitted,

Lorenzo Perez Hernandez  
**LORENZO PEREZ HERNANDEZ** (Pro Se)

A# 

Broward Transitional Center  
3900 N. Powerline Rd,  
Pompano Beach, FL 33073

**PROOF OF SERVICE**

**UNITED STATES DISTRICT COURT, SOUTHERN DISTRICT OF FLORIDA**

I, Lorenzo Perez Hernandez declare that on the date shown below, I served a true and correct copy of the following documents on all Respondents by depositing the following documents in the United States Mail, first-class postage prepaid, addressed as follows:

- Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 (Pro Se)
- Exhibits (**Exhibit A through Exhibit E**)

Clerk of Court  
U.S. District Court for the Southern District of Florida  
Wilkie D Ferguson Jr. U.S Courthouse  
400 N Miami Ave,  
Miami, FL 33128

Assistant United States Attorney's Office– Southern District of Florida  
99 NE 4th Street,  
Miami, FL 33132

Attorney General of the United States  
U.S. Department of Justice  
950 Pennsylvania Avenue, NW  
Washington, DC 20530

Department of Homeland Security (DHS)  
2707 Martin Luther King Jr. Ave SE  
Washington, DC 20528

U.S. Immigration and Customs Enforcement (ICE)  
500 12th Street, SW  
Washington, DC 20536

ICE Enforcement and Removal Operations (ERO) – Miami Field Office  
2805 SW 145th Ave  
Miramar, FL 33027

Warden/Facility Administrator  
Broward Transitional Center  
3900 N. Powerline Rd,  
Pompano Beach, FL 33073

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

Executed on: February 19, 2026

Signature: Lorena Perez Hernandez

Printed Name: Lorena Perez Hernandez