UNITED STATES DISTRICT COURT

for the

Eastern District of New York

Erick Milton Jimenez Carrillo

Petitioner

v.

Kristi NOEM; Pamela BONDI; Todd LYONS,Warden of The Delaney Hall Detention Facility

Respondent
(name of warden or authorized person having custody of petitioner)

Case No. _____
(Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: Erick Milton Jimenez Carrillo

   (b) Other names you have used: _____

2. Place of confinement:

   (a) Name of institution: Delaney Hall Detention Facility

   (b) Address: 451 DOREMUS AVENUE
   NEWARK, NJ 07105

   (c) Your identification number: [redacted]

3. Are you currently being held on orders by:

   ☑ Federal authorities ☐ State authorities ☐ Other - explain:

4. Are you currently:

   ☐ A pretrial detainee (waiting for trial on criminal charges)

   ☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime

   If you are currently serving a sentence, provide:

   (a) Name and location of court that sentenced you: _____

   (b) Docket number of criminal case: _____

   (c) Date of sentencing: _____

   ☑ Being held on an immigration charge

   ☐ Other *(explain)*: _____

Decision or Action You Are Challenging

5. What are you challenging in this petition:

☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

☐ Pretrial detention

☑ Immigration detention

☐ Detainer

☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)

☐ Disciplinary proceedings

☐ Other *(explain)*: _____

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: U.S. Department of Homeland Security, Immigration and Customs Enforcement (ICE) Delaney Hall Detention Facility in Newark, New Jersey

(b) Docket number, case number, or opinion number: [redacted]

(c) Decision or action you are challenging *(for disciplinary proceedings, specify the penalties imposed)*:

Ongoing ICE Detention without a Bond Hearing custody or custody redetermination

(d) Date of the decision or action: _____

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☐ Yes ☑ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not appeal:

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☐ Yes ☑ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court:

(2) Date of filing:

(3) Docket number, case number, or opinion number:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not file a second appeal:

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☐ Yes ☑ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court:

(2) Date of filing:

(3) Docket number, case number, or opinion number:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not file a third appeal:

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes ☑ No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☐ Yes ☐ No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes ☑ No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence:

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☑ Yes ☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: 02/27/2026

(b) Date of the removal or reinstatement order:

(c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes ☑ No

If "Yes," provide:

(1) Date of filing:

(2) Case number:

(3) Result:

(4) Date of result:

(5) Issues raised:

(d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes ☑ No

If "Yes," provide:

(1) Name of court:

(2) Date of filing:

(3) Case number:

(4) Result:

(5) Date of result:

(6) Issues raised:

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☐ Yes ☑ No

If "Yes," provide:

(a) Kind of petition, motion, or application:

(b) Name of the authority, agency, or court:

(c) Date of filing:

(d) Docket number, case number, or opinion number:

(e) Result:

(f) Date of result:

(g) Issues raised:

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground.

GROUND ONE: Petitioner is detained under INA §236(a) without any individualized custody determination or bond hearing.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

Petitioner was arrested by ICE on February 27, 2026, at approximately 6:40 AM near his home in Queens, NY, while placing belongings in his vehicle. He has no criminal history and was not previously in removal proceedings. He remains detained without any custody determination (Form I-286) or bond hearing.

(b) Did you present Ground One in all appeals that were available to you?

☐ Yes ☑ No

GROUND TWO: Petitioner' s detention is prolonged, arbitrary, and lacks individualized review.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

Petitioner entered the United States in June 2020 and has continuously resided here since. He has no criminal record, no prior removal proceedings, and poses no danger or flight risk. His detention is prolonged and lacks any individualized review.

(b) Did you present Ground Two in all appeals that were available to you?

☐ Yes ☑ No

GROUND THREE: ICE has failed to provide a prompt bond redetermination hearing.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

ICE has not provided Petitioner with Form I-286 or afforded him an opportunity for bond redetermination before an Immigration Judge. This deprives him of a meaningful chance to challenge his detention.

(b) Did you present Ground Three in all appeals that were available to you?

☐ Yes ☑ No

GROUND FOUR: Risk of transfer outside the District of New Jersey would interfere with counsel access and judicial review.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

Petitioner was initially detained at NYC Hold Room.

Petitioner is currently detained in the District of New Jersey. Transfer outside this district while the habeas petition is pending would interfere with his access to counsel and judicial review, causing irreparable

(b) Did you present Ground Four in all appeals that were available to you?

☐ Yes ☑ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

Request for Relief

15. State exactly what you want the court to do: Petitioner respectfully requests that this Court:

1. Issue a writ of habeas corpus ordering Petitioner' s immediate release from unlawful detention;

2.Alternatively, order a prompt bond redetermination hearing before an Immigration Judge in accordance, with due proces

3.Grant a temporary restraining order (TRO) or preliminary injunction preventing ICE from transferring Petitioner outside of the Distric of New Jersey; 4. Grant any further relief that the Court deems just and proper.

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 03/04/2026

Erick Milton Jimenez Carrillo
Signature of Petitioner

Signature of Attorney or other authorized person, if any