

Jorge Abel Sanchez Urrea

NAME

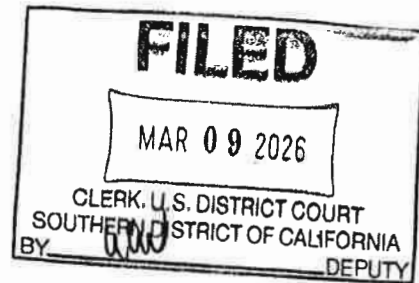
PRISON NUMBER

Otay Mesa Detention Center

PLACE OF CONFINEMENT

7488 Calzada de la Fuente San Diego CA 92154

ADDRESS



United States District Court
Southern District Of California

Jorge Abe Sanchez Urrea

(FULL NAME OF PETITIONER)

Petitioner

Christopher J. LaRose - Warden
Gregory J. Archambeault - FOD / ERO

(NAME OF WARDEN, SUPERINTENDENT, JAILOR, OR AUTHORIZED
PERSON HAVING CUSTODY OF PETITIONER, E.G. PAROLE OFFICER)

Respondent

and
The Attorney General of the State of
California, Additional Respondent.

Civil No. '26CV1429 TWR JLB

(TO BE FILLED IN BY CLERK OF U.S. DISTRICT COURT)

PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

I. 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 or case number (if you know): _____

(c) Date of sentencing: _____

☒ Being held on immigration charge

☒ Other (explain): Petitioner has NO criminal record and is pending
an asylum case

2. Are you currently being held on orders by:
☒ Federal authorities ☐ State authorities ☒ Other - explain:
and removal operations, San Diego field office
3. What are you challenging in this petition:
☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities
☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed
☐ Disciplinary proceedings
☒ Other (specify): continued civil immigration detention without bond hearing
4. Provide more information about the decision or action you are challenging:
- (a) Name and location of the court or agency: US Immigration and Customs Enforcement (ICE) Enforcement Removal Operations (ERO), 7488 Calzada de la Fuente San Diego CA 92154.
- (b) Case number, docket number or opinion number (if you know): N/A
- (c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed): ICE's continued civil immigration detention of petitioner for four months without a bond hearing or individualized custody determination, in violation of the Due Process clause of the fifth amendment.
- (d) Date of the decision or action: "Ongoing" / "N/A"
5. Did you **appeal** the decision, file a grievance or seek an administrative remedy?
☐ Yes ☒ No
- (a) If your answer to 5 was "Yes," give the following information:
- (1) Name of court, agency or authority: _____
- (2) Date of filing: _____
- (3) Case number, docket number or opinion number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____
- _____
- _____
- _____

- (b) If your answer to 5 was "No," explain why you did not appeal: No prior appeal filed, detention is ongoing and this is the first petition challenging it.

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

☐ Yes ☒ No

- (a) If your answer to 6 was "Yes," give the following information:

- (1) Name of court, agency or authority: _____
- (2) Date of filing: _____
- (3) Case number, docket number or opinion number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

- (b) If your answer to 5 was "No," explain why you did not appeal: No prior appeal filed, detention is ongoing and this is the first petition challenging it.

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

☐ Yes ☒ No

- (a) If your answer to 7 was "Yes," give the following information:

- (1) Name of court, agency or authority: _____
- (2) Date of filing: _____
- (3) Case number, docket number or opinion number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

- (b) If your answer to 7 was "No," explain why you did not appeal: No prior appeal filed detention is ongoing and this is the first petition challenging it.

8. State *concisely* every ground on which you claim that you are being held in violation of the constitution, law or treaties of the United States. Summarize *briefly* the facts supporting each ground. If necessary, you may attach pages stating additional grounds and facts supporting same.

CAUTION: In order to proceed in the federal court, you must ordinarily first exhaust your available court remedies as to each ground on which you request action by the federal court. Moreover, if you fail to set forth all grounds in this petition, you may be barred from presenting additional grounds at a later date.

You should raise in this petition all available grounds on which you base your allegations that you are being held in custody unlawfully.

GROUND ONE: Unlawful Prolonged Civil Immigration Detention

- (a) Supporting FACTS (state *briefly* without citing cases or law) Petitioner has been detained by ICE for four months without a bond hearing, nor any individualized custody determination.

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

☐ Yes ☐ No

GROUND TWO: Violation of Due Process

(a) **Supporting FACTS** (state briefly without citing cases or law): Petitioner has
No criminal records and is not subject to mandatory
detention, has a pending asylum application
and has a scheduled immigration court
hearing on March 31st 2026. Despite being
eligible ICE has not provided a bond hearing or
meaningful custody review.

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

☐ Yes ☐ No

GROUND THREE: Failure to provide individualized
Custody review

(a) **Supporting FACTS** (state briefly without citing cases or law):

Petitioner entered the United States through the
CBP One Process and 11 months later was detained
at an interior check point (campo checkpoint) he has
NO criminal record/history and poses no flight risk
or danger.

Since entering the country Petitioner has voluntarily
attended all Immigration Appointments and/or
notices to appear to court.

Petitioner has strong ties to the community
and a pending asylum application.

Supporting documents are attached

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

☐ Yes ☐ No No prior Appeals.

GROUND FOUR: _____

(a) **Supporting FACTS** (state *briefly* without citing cases or law): _____

(b) Did you present Ground Four in all appeals that were available to you? *N/A*.

☐ Yes ☐ No

9. If any of the grounds listed in 4A, B, C, and D were not previously presented in any other court, state or federal, state briefly what grounds were not presented, and give your reasons for not presenting them:

10. Do you have any petition or appeal now pending in any court, either state or federal, as to the execution of sentence under attack?

☐ Yes ☒ No

11. Give the name and address, if known, of each attorney who represented you in the following stages of the execution of sentence attacked herein:

(a) In any post-conviction proceeding _____

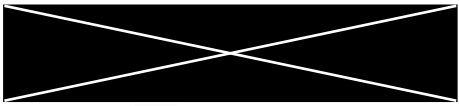
(b) On appeal from any adverse ruling in a post-conviction proceeding _____

Wherefore, petitioner prays that the Court grant petitioner relief to which he may be entitled in this proceeding.

SIGNATURE OF ATTORNEY (IF ANY)

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

3/09/26
(DATE)


SIGNATURE OF PETITIONER