

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WILIAN ESTUARDO FIGUEROA
MONROY

Petitioner,

V.

J.L. JAMISON, in his official capacity as Warden :
of Federal Detention Center, Philadelphia; :
BRIAN MCSHANE, in his official capacity as :
Acting Philadelphia Field Office Director, :
United States Immigration and Customs :
Enforcement; TODD LYONS, in his :
Official capacity as Acting Director of :
Immigration and Customs Enforcement; :
MARKWAYNE MULLIN, in his official :
capacity as Secretary of the Department of :
Homeland Security; THE U.S. DEPARTMENT :
Of HOMELAND SECURITY; PAMELA BONDI, :
Attorney General of the United States :

Respondents.

PETITION FOR WRIT OF HABEAS CORPUS

WILIAN ESTUARDO FIGUEROA MONROY (hereinafter referred to as “Petitioner” or “Mr. Figueroa Monroy”, A  submits this petition for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and the Suspension Clause (Article 1, Section 9, Clause 2) of the United States Constitution. Petitioner requests

that this Court release him from detention by the Immigration and Customs Enforcement (“ICE”) or, alternatively, conduct or order a bond hearing in which the Respondents bear the burden of justifying Petitioner’s continued detention. Petitioner also requests that the Court set aside recent policies implemented by Respondents that are contrary to the statutory right of non-citizens like Petitioner to seek release and bail through an exercise of the Respondents’ discretion.

Mr. Figueroa Monroy is a native of Guatemala seeking asylum in the United States. Mr. Figueroa Monroy entered the United States in April of 2023 at the border.

On March 17, 2026, Mr. Figueroa Monroy was detained while walking down the street after leaving his. ICE agents arrested Mr. Figueroa Monroy without stated justification. Respondents arbitrarily detained, Mr. Figueroa Monroy despite the requirement under 8 U.S.C. § 1226(a) and its implementing regulations that immigration officials make an individualized custody determination. Moreover, Respondents have adopted policies enshrined in administrative decisions by the Board of Immigration Appeals (“BIA”) that subject non-citizens like Mr. Figueroa Monroy to mandatory detention in violation of Section 1226(a).

Mr. Figueroa Monroy is presently detained at the Federal Detention Center in Philadelphia. See ICE Detainee locator attached as Exhibit “A”.

JURISDICTION AND VENUE

1. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 2241 (habeas corpus); 28 U.S.C. § 1651 (All Writs Act); 28 U.S.C. § 1331 (federal question); 5 U.S.C. § 702 (Administrative Procedures Act); U.S. Const. amend. V (Due Process Clause); and U.S. Const. art. I, § 9, cl. 2 (Suspension Clause).

2. Venue is proper in the Eastern District of Pennsylvania pursuant to 28 U.S.C. § 1391(b) and 28 U.S.C. § 2241(d), because at the time of filing his Petition for Writ of Habeas Corpus (Doc. 1), Mr. Figueroa Monroy is imprisoned at the Federal Detention Center (“FDC”) in Philadelphia, Pennsylvania.

PARTIES

3. Petitioner Mr. Figueroa Monroy is a native of Guatemala seeking asylum and withholding from removal. He is detained at the Federal Detention Center in Philadelphia, PA.

4. Respondent J.L. Jamison is named in his official capacity as the Warden of FDC, Philadelphia, which detains individuals suspected of civil immigration violations. Respondent Jamison is the immediate physical custodian responsible for the detention of Petitioner.

5. Respondent Brian McShane is the Acting Philadelphia Field Office Director for Immigration and Customs Enforcement's ("ICE") Enforcement and Removal Operations. In this capacity he is responsible for the custody of all noncitizens detained by ICE at FDC, Philadelphia and has the authority to release Mr. Figueroa Monroy or transfer him to a different facility. He is one of Mr. Figueroa Monroy's immediate custodians and is sued in his official capacity.

6. Respondent Todd Lyons is the Acting Director of ICE. In this capacity he is responsible for enforcing immigration laws, and as such is a legal custodian of Mr. Figueroa Monroy. He is sued in his official capacity.

7. Respondent Markwayne Mullin is Secretary of Homeland Security. In this capacity he runs the Department of Homeland Security, and is charged pursuant to 8 U.S.C. 1103(a)(1) with administering and enforcing immigration laws. He is the ultimate legal custodian of Mr. Figueroa Monroy and is sued in his official capacity.

8. The Department of Homeland Security ("DHS") is the agency of the federal government responsible for enforcing the immigration laws. DHS is also Mr. Figueroa Monroy's legal custodian.

9. Respondent Pamela Bondi is the Attorney General of the United States and the head of the U.S. Department of Justice, which encompasses the Board of Immigration Appeals (“BIA”) and immigration courts, known collectively as the Executive Office of Immigration Review (“EOIR”). Ms. Bondi shares responsibility for the implementation and enforcement of immigration laws along with Respondent Mullin. Ms. Bondi is a legal custodian of Mr. Figueroa Monroy. She is sued in her official capacity.

LEGAL FRAMEWORK

10. For non-citizens attempting to enter the United States, the INA provides under 8 U.S.C. § 1225(b)(2)(A) that “in the case of [a non-citizen] who is an applicant from admission, if the examining immigration officer determines that an alien seeking admission is not clearly and beyond a doubt entitled to be admitted, the alien shall be detained.” “A noncitizen detained under Section 1225(b)(2) may be released only if he is paroled ‘for urgent humanitarian reasons or significant public benefit’ pursuant to 8 U.S.C. § 1182(d)(5)(A).” *Gomes v. Hyde*, 25 Civ. 11571, 2025 WL 1868288, at *2 (D. Mass. July 7, 2025) (quoting *Jennings v. Rodriguez*, 583 U.S. 281, 300 (2018)).

11. In contrast, the Supreme Court has found that “U.S. immigration law authorizes the Government to detain certain [non-citizens] *already in the*

country pending the outcome of removal proceedings under §§ 1226(a) and (c).”

Jennings, 583 U.S. at 288-89.

12. Section 236 of the INA provides in relevant part as follows:

(a) Arrest, Detention, and Release. On a warrant issued by the Attorney General, *an alien may be arrested and detained pending a decision on whether the alien is to be removed from the United States*. Except as provided in subsection (c) and pending such decision, *the Attorney General—*

(1) *may continue to detain the arrested alien; and*

(2) *may release the alien on—*

(A) bond of at least \$1,500 with security approved by, and containing conditions prescribed by, the Attorney General; or

(B) conditional parole ...

13. The Supreme Court has interpreted similar “may” language in other provisions of the INA to require “some level of individualized determination.” *I.N.S. v. Nat’l Ctr. For Immigrants’ Rights*, 502 U.S. 183, 194 (1991). The regulation implementing Respondents’ authority to arrest non-citizens present in the United States reads:

“Any officer authorized to issue a warrant of arrest may, in the officer's discretion, release an alien not described in [8 U.S.C. § 1236(c)(1)] of the Act, under the conditions at section [8 U.S.C. § 1236(a)(2) and (3)]; provided that the alien must demonstrate to the satisfaction of the officer that such release would not pose a danger to property or persons, and that the alien is likely to appear for any future proceeding.”

8 U.S.C. § 1236.1(c)(8).

14. Noncitizens may request a review of an initial custody determination before an Immigration Judge (“IJ”). 8 C.F.R. § 1236.1(d)(1); 8 C.F.R. § 1002.19(a). At this hearing an IJ may make the decision “upon any information that is available to the [Immigration Judge] or that is presented to him or her by the [non-citizen] or the [government].” 8 C.F.R. § 1003.19(d); *see also Matter of Guerra*, 24 I&N Dec. 37, 39 (BIA 2006). Non-citizens may appeal a negative decision in a custody review before an IJ to the Board of Immigration Appeals. 8 C.F.R. § 1236.1(d)(3)(i). The current statutory scheme was created through the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (“IIRIRA”).

15. For the first time in nearly three decades, Respondents have taken the position through a series of precedential decisions by the Board of Immigration Appeals that non-citizens residing in the interior of the United States are not entitled to a custody redetermination (a “bond hearing”) before an Immigration Judge.

16. First, in *Matter of Q. Li*, 29 I&N Dec. 66 (BIA 2025), the BIA held that a non-citizen who had been apprehended at the border and subsequently released into the United States is subject to mandatory detention without a possibility of bail upon re-detention, pursuant to 8 U.S.C. § 1225(b), even if that re-detention occurs years after their initial release from custody. The BIA reasoned that “an

applicant for admission who is arrested and detained without a warrant while in the process of arriving in the United States, whether or not at a port of entry, and subsequently placed in removal proceedings is detained under section [1225(b)] [], and is ineligible for any subsequent release on bond under section [1226(a)].” *Q. Li*, 29 I&N Dec. at 74.

17. Then in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), the BIA stated that all non-citizens who are present in the United States without admission are subject to mandatory detention under Section 1225(b), regardless of how long they have been residing in the U.S. and absent any prior interaction with immigration authorities.

FACTS AND PROCEDURAL HISTORY

18. Mr. Figueroa Monroy is a native of Guatemala.

19. In April of 2023, Mr. Figueroa Monroy entered the United States.

20. Mr. Figueroa Monroy settled in Philadelphia, Pennsylvania where he was living before his incarceration.

21. On March 17, 2026, Mr. Figueroa Monroy left his residence and was walking down the street, when, without prior warning, ICE officials took Mr. Figueroa Monroy into custody. Mr. Figueroa Monroy was transported to FDC, Philadelphia. He remains detained there.

CLAIM FOR RELIEF
COUNT ONE

VIOLATION OF DUE PROCESS, U.S. CONST. AMEND. V

22. Petitioner repeats and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

23. The Fifth Amendment’s Due Process Clause prevents the Government from depriving any person of “life, liberty, or property, without due process of law.” U.S. Const. amend. V.

24. The Due Process Clause extends to noncitizens residing in the United States, whether they have lawful status or not. *See Mathews v. Diaz*, 426 U.S. 67, 77 (1976); *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001). Specifically, “[i]t is well established that the Fifth Amendment entitles [non-citizens] to due process of law in deportation proceedings. *Reno v. Flores*, 507 U.S. 292, 306 (1993); *see also Abdulai v. Ashcroft*, 239 F.3d 542, 549 (3d Cir. 2001) (“[Non-citizens] facing removal are entitled to due process”); *Calderon-Rosas v. Atty’ Gen.*, 957 F.3d 378, 386 (3d Cir. 2020) (“In sum, petitioners seeking discretionary relief are entitled to fundamentally fair removal proceedings, which constitutes a protected interest supporting a due process claim.”).

25. Evaluating the adequacy of the process provided to a non-citizen requires a balancing of factors. “First, the private interest that will be affected by the official action; second, the risk of an erroneous deprivation of such interest through the procedures used, and the probable value, if any, of additional or substitute procedural safeguards; and finally, the Government's interest, including the function involved and the fiscal and administrative burdens that the additional or substitute procedural requirement would entail.” *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976).

26. First, Mr. Figueroa Monroy faces “the most significant liberty interest there is—the interest in being free from imprisonment.” *Velasco Lopez v. Decker*, 978 F.3d 842, 851 (2d Cir. 2020) (citing *Hamdi v. Rumsfeld*, 542 U.S. 507, 529 (2004)). Second, Respondents have erroneously deprived Mr. Figueroa Monroy of his liberty without any individualized assessment of his circumstances. Third, Respondents did not make any individualized finding that Mr. Figueroa Monroy was a danger or flight risk, so there does not appear to be a significant government interest in detaining Mr. Figueroa Monroy.

27. An application of these factors requires that Mr. Figueroa Monroy should have been provided with additional process before being detained.

COUNT TWO

VIOLATION OF THE IMMIGRATION AND NATIONALITY ACT, 8 U.S.C. § 1226(a)

28. Petitioner repeats and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

29. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to grounds of inadmissibility. As, relevant here, it does not apply to those who have been residing in the United States at liberty after being briefly detained at or near the border. Such noncitizens, if detained, are done so under § 1226(a), and are generally eligible release on bond.

30. Respondents' authority to detain Mr. Figueroa Monroy is derived from 8 U.S.C. § 1226(a) as Mr. Figueroa Monroy is already present in the United States.

31. Respondents have detained Mr. Figueroa Monroy without making an individualized determination regarding whether he posed a danger or flight risk as required by 8 U.S.C. § 1226(a) and its regulations.

32. Moreover, Respondents' current policies as set forth in the BIA's decisions in *Matter of Q. Li* and *Matter of Yajure Hurtado* unlawfully prevent Mr.

Figueroa Monroy from obtaining a custody redetermination in front of an Immigration Judge as is his right by statute.

COUNT THREE

VIOLATION OF THE BOND REGULATIONS, 8 C.F.R. §236.1, 1236.1 and 1003.19

33. Petitioner repeats and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

34. In 1997, after Congress amended the INA through IIRIRA, EOIR the then-Immigration and Naturalization Service issued an interim rule to interpret and apply IIRIRA. Specifically, under the heading of “Apprehension, Custody, and Detention of [Non-citizens],” the agencies explained that “[d]espite being applicants for admission, [noncitizens] who are present without having been admitted or paroled (formerly referred to as [noncitizens] who entered without inspection) *will be eligible for bond and bond redetermination.*” 62 Fed. Reg. at 10323 (emphasis added). Thus, the agencies made clear that non-citizens present in the United States would be eligible for consideration for bond and bond hearings before IJs under 8 U.S.C. § 1226 and its implementing regulations.

35. Yet, Respondents have adopted a policy and practice of applying § 1225(b)(2) to non-citizens like Mr. Figueroa Monroy who are present in the United States without being admitted or paroled.

36. The application of § 1225(b)(2) to Mr. Figueroa Monroy unlawfully mandates his continued detention in violation of 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

COUNT FOUR

VIOLATION OF THE ADMINISTRATIVE PROCEDURE ACT (“APA”), 5 U.S.C. § 701, *et. seq.*

37. Petitioner repeats and incorporates by reference each and every allegation contained in the preceding paragraphs as if fully set forth herein.

38. Mr. Figueroa Monroy is aggrieved by agency action under the Administrative Procedure Act, 5 U.S.C. §§ 701 *et. seq.* Specifically, Respondents have acted arbitrarily in detaining Mr. Figueroa Monroy without conducting an individualized determination into his circumstances. In other words, Respondents have not presented any indication that Mr. Figueroa Monroy’s circumstances have changed such that he is now a danger or flight risk in a way that he was not when he was admitted into the United States at the border in April of 2023.

39. Additionally, Respondents’ recent policies announced through administrative decisions issued by the BIA unlawfully withhold the right to a bond hearing under 8 U.S.C. § 1226(a) to Mr. Figueroa Monroy.

40. These policies are arbitrary, capricious, and not in accordance with the text of the INA.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

1. Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner from custody immediately on his own recognizance or under parole, bond or reasonable conditions of supervision, on the ground that his continued detention by the Department of Homeland Security violates his Due Process rights;
2. Set aside Respondents' unlawful detention policy contained *Matter of Q. Li* and *Matter of Yajure Hurtado* under the APA, 5 U.S.C. § 706(2), as contrary to law, arbitrary and capricious, and contrary to constitutional right;
3. Issue a writ requiring an immediate, constitutionally adequate hearing before an Immigration Judge, at which: (i) DHS bears the burden to demonstrate, by clear and convincing evidence, that Petitioner's continued detention is necessary, and (ii) the immigration judge considers Petitioner's ability to pay a bond.

4. While this petition is pending, order Petitioner's immediate release pursuant to the Court's inherent authority to release habeas corpus petitioners on bail;

5. Enter a judgment declaring that Respondents' detention of Petitioner is unauthorized by statute and contrary to law and the U.S. Constitution;

6. Award Petitioner reasonable costs and attorneys' fees; and

7. Grant any further relief that this Court may deem fit and proper.

Dated: March 18, 2026

Respectfully submitted,

s/ Jose C. Campos, Esquire
Jose C. Campos (PA Bar 207646)
The Campos Firm
251 East Broad Street
Bethlehem, PA 18018
p. (610) 868-2230
jc@jccamposlaw.com
ATTORNEY FOR PETITIONER

LIST OF EXHIBITS

Exh. A. ICE Detainee Locator

EXHIBIT A



U.S. Immigration and Customs Enforcement

Report Crimes: Email or Call 1-866-DHS-2-ICE

[Home](#)[Who We Are](#)[What We Do](#)[Newsroom](#)[Information Library](#)[Contact ICE](#)[< BACK TO RESULTS](#)

Facility Page

Detention Information For:

WILIAN ESTUARDO FIGUEROA MONROY

Country of Birth: Guatemala

A-Number: 

Current Detention Facility:

Philadelphia Federal Detention Center
700 Arch Street

NA

Philadelphia, PA 19106

Visitor Information: (215) 521-4000

[MORE INFORMATION >](#)

ERO Office Information

Family members and legal representatives may be able to obtain additional information about this individual's case by contacting this ERO office:

PHILADELPHIA, PA, DOCKET CONTROL
OFFICE

Phone Number: (215) 656-7164

[BACK TO SEARCH >](#)

Related Information

Helpful Info

[Status of a Case](#)[About the Detainee Locator](#)[Privacy](#) - [Terms](#)

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I (a) PLAINTIFFS

J.L. JAMISON, BRIAN MCSHANE, TODD LYONS,
SECRETARY, U.S. OHS, and PAMELA BONDI

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

US Attorney's Office, Philadelphia, PA

(b) County of Residence of First Listed Plaintiff Philadelphia County
(EXCEPT IN U.S. PLAINTIFF CASES)

Jose C. Campos, Esquire
251 E Broad St.
Bethlehem, PA 18018

III. CITIZENSHIP OF PRINCIPAL PARTIES *(Place an "X" in One Box for Plaintiff and One Box for Defendant)*
(For Diversity Cases Only)

	PTF	DEF		PTF	DEF
Citizen of This State	D 1	☐ 1	Incorporated <i>or</i> Principal Place of Business In This State	D 4	☐ 4
Citizen of Another State	D 2	D 2	Incorporated <i>and</i> Principal Place of Business In Another State	☐ S	☐ O s
Citizen or Subject of a Foreign Country	☐ 3	D 3	Foreign Nation	☐ 6	☐ 6

Click here for: [Nature of Suit Code Descriptions.](#)

CONTRACT		TORTS		FORFEITURE/PENALTY		BANKRUPTCY		OTHER STATUTES	
110 Insurance	PERSONAL INJURY	PERSONAL INJURY	☐ 625 Drug Related Seizure	☐ 422 Appeal 28 USC 158	☐ 375 False Claims Act				
120 Marine			☐ of Property 21 USC 881	☐ 423 Withdrawal	☐ 376 Qui Tam (31 USC				
130 Miller Act			☐ 690 Other	☐ 28 USC 157	☐ 3729(a))				
140 Negotiable Instrument			INTELLECTUAL		☐ 400 State Reapportionment				
D 150 Recovery of Overpayment & Enforcement of Judgment			☐ 320 Assault, Libel & Slander	☐ 820 Copyrights	☐ 410 Antitrust				
			☐ 330 Federal Employers' Liability	☐ 830 Patent	☐ 430 Banks and Banking				
B 151 Medicare Act			☐ 340 Marine	☐ 835 Patent - Abbreviated New Drug Application	☐ 450 Commerce				
152 Recovery of Defaulted Student Loans (Excludes Veterans)			☐ 345 Marine Product Liability	☐ 840 Trademark	☐ 460 Deportation				
D 153 Recovery of Overpayment of Veteran's Benefits			☐ 350 Motor Vehicle	☐ 880 Defend Trade Secrets Act of 2016	☐ 470 Racketeer Influenced and Corrupt Organizations				
			☐ 355 Motor Vehicle	LABOR		☐ 480 Consumer Credit (15 USC 1681 or 1692)			
D 160 Stockholders' Suits	☐ 360 Other Personal Injury	☐ 710 Fair Labor Standards Act	☐ 485 Telephone Consumer Protection Act						
D 190 Other Contract	☐ 362 Personal Injury - Medical Malpractice	☐ 720 Labor/Management Relations	☐ 490 Cable/Sat TV						
B 195 Contract Product Liability		☐ 740 Railway Labor Act	☐ 850 Securities/Commodities/Exchange						
D 196 Franchise		☐ 751 Family and Medical Leave Act	☐ 890 Other Statutory Actions						
REAL PROPERTY		☐ 790 Other Labor Litigation	☐ 861 HIA (1395ft)	☐ 891 Agricultural Acts					
☐ 210 Land Condemnation	☐ 440 Other Civil Rights	☐ 791 Employee Retirement Income Security Act	☐ 862 Black Lung (923)	☐ 893 Environmental Matters					
D 220 Foreclosure	☐ 441 Voting		☐ 863 DIWC/DIWW (405(g))	☐ 895 Freedom of Information Act					
230 Rent Lease & Ejectment	☐ 442 Employment		☐ 864 SSID Title XVI	☐ 896 Arbitration					
\$ 240 Torts to Land	☐ 443 Housing/Accommodations		☐ 865 RSI (405(g))	☐ 899 Administrative Procedure Act/Review or Appeal of Agency Decision					
245 Tort Product Liability	☐ 445 Amer. w/Disabilities - Employment	IMMIGRATION	☐ 870 Taxes (U.S. Plaintiff - or Defendant)	☐ 950 Constitutionality of State Statutes					
D 290 All Other Real Property	☐ 446 Amer. w/Disabilities - Other	☐ 462 Naturalization Application	☐ 871 IRS-Third Party 26 USC 7609						
	☐ 448 Education	☐ 465 Other Immigration Actions							
PROPERTY RIGHTS									
☐ 440 Other Civil Rights	☒ 463 Alien Detainee								
☐ 441 Voting	☐ 510 Motions to Vacate Sentence								
☐ 442 Employment	☐ 530 General								
☐ 443 Housing/Accommodations	☐ 535 Death Penalty								
☐ 445 Amer. w/Disabilities - Employment	Other:								
☐ 446 Amer. w/Disabilities - Other	☐ 540 Mandamus & Other								
☐ 448 Education	☐ 550 Civil Rights								
	☐ 555 Prison Condition								
	☐ 560 Civil Detainee - Conditions of Confinement								

0	1 Original Proceeding	D2	Removed from State Court	☐	3	Remanded from Appellate Court	D4	Reinstated or Reopened	D5	Transferred from Another District (specify)	☐	6	Multidistrict Litigation - Transfer	D8	Multidistrict Litigation - Direct File
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Cite the U.S. Civil Statute under which you are filing *(Do not cite jurisdictional statutes unless diversity)*:

28 2241
- u.s.c. § - - - - -
Brief description of cause:
Petition for Writ of Habeas Corpus

☐ CHECK IF THIS IS A **CLASS ACTION** **DEMANDS**
UNDER RULE 23, F.R.Cv.P.

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

(See instructions):

JUDGE _____

DOCKET NUMBER _____

SIGNATURE OF ATTORNEY OF RECORD

03/18/2026 is/ Jose C. Campos, Esquire

RECEIPT#	AMOUNT	APPLYING IFP	JUDGE	MAG.JUDGE
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**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

DESIGNATION FORM

Place of Accident, Incident, or Transaction: Federal Detention Center, Philadelphia PA

RELATED CASE IF ANY: Case Number: _____ Judge: _____

- | | |
|---|------------------------------|
| 1. Does this case involve property included in an earlier numbered suit? | Yes ☐ |
| 2. Does this case involve a transaction or occurrence which was the subject of an earlier numbered suit? | Yes ☐ |
| 3. Does this case involve the validity or infringement of a patent which was the subject of an earlier numbered suit? | Yes ☐ |
| 4. Is this case a second or successive habeas corpus petition, social security appeal, or pro se case filed by the same individual? | Yes ☐ |
| 5. Is this case related to an earlier numbered suit even though none of the above categories apply?
If yes, attach an explanation. | Yes ☐ |

I certify that, to the best of my knowledge and belief, the within case ☐ is / ☒ is not related to any pending or previously terminated action in this court.

Civil Litigation Categories

A. Federal Question Cases:

- ☐ 1. Indemnity Contract, Marine Contract, and All Other Contracts)
- ☐ 2. FELA
- ☐ 3. Jones Act-Personal Injury
- ☐ 4. Antitrust
- ☐ 5. Wage and Hour Class Action/Collective Action
- ☐ 6. Patent
- ☐ 7. Copyright/Trademark
- ☐ 8. Employment
- ☐ 9. Labor-Management Relations
- ☐ 10. Civil Rights
- ☒ 11. Habeas Corpus
- ☐ 12. Securities Cases
- ☐ 13. Social Security Review Cases
- ☐ 14. Qui Tam Cases
- ☐ 15. Cases Seeking Systemic Relief ***see certification below***
- ☐ 16. All Other Federal Question Cases. (Please specify): _____

B. Diversity Jurisdiction Cases:

- ☐ 1. Insurance Contract and Other Contracts
- ☐ 2. Airplane Personal Injury
- ☐ 3. Assault, Defamation
- ☐ 4. Marine Personal Injury
- ☐ 5. Motor Vehicle Personal Injury
- ☐ 6. Other Personal Injury (Please specify): _____
- ☐ 7. Products Liability
- ☐ 8. All Other Diversity Cases: (Please specify) _____

I certify that, to the best of my knowledge and belief, that the remedy sought in this case ☐ does / ☒ does not have implications beyond the parties before the court and ☐ does / ☒ does not seek to bar or mandate statewide or nationwide enforcement of a state or federal law including a rule, regulation, policy, or order of the executive branch or a state or federal agency, whether by declaratory judgment and/or any form of injunctive relief.

ARBITRATION CERTIFICATION (CHECK ONLY ONE BOX BELOW)

I certify that, to the best of my knowledge and belief:

☒ Pursuant to Local Civil Rule 53.2(3), this case is not eligible for arbitration either because (1) it seeks relief other than money damages; (2) the money damages sought are in excess of \$150,000 exclusive of interest and costs; (3) it is a social security case, includes a prisoner as a party, or alleges a violation of a right secured by the U.S. Constitution, or (4) jurisdiction is based in whole or in part on 28 U.S.C. § 1343.

☐ None of the restrictions in Local Civil Rule 53.2 apply and this case is eligible for arbitration.

NOTE: A trial de novo will be by jury only if there has been compliance with F.R.C.P. 38.

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

WILIAN ESTUARDO FIGUEROA MONROY

Petitioner,

v.

J.L. JAMISON, in his official capacity as Warden
of Federal Detention Center, Philadelphia;

BRIAN MCSHANE, in his official capacity as
Acting Philadelphia Field Office Director,

United States Immigration and Customs

Enforcement; TODD LYONS, in his

Official capacity as Acting Director of

Immigration and Customs Enforcement;

KRISTI NOEM, in her official capacity as

Secretary of the Department of Homeland

Security; THE U.S. DEPARTMENT OF

HOMELAND SECURITY; PAMELA BONDI,

Attorney General of the United States

Respondents.

CERTIFICATE OF SERVICE

I, Jose C. Campos, Esquire, attorney for the Petitioner, Wilian Estuardo Figueroa Monroy, *hereby certify that on this 18th day of March 2026, I served a true copy of the* following documents by electronic filing and USPS first class mail upon the parties named below:

**PETITION FOR WRIT OF HABEAS CORPUS, CIVIL COVER SHEET
and CERTIFICATE OF SERVICE**

J.L. Jamison, Warden
Warden of Federal Detention Center
700 Arch Street
Philadelphia, PA 19106

Brian McShane
Acting Philadelphia Field Office Director
United States Immigration & Customs
114 N 8th Street
Philadelphia, PA 19107

Todd Lyons, Acting Director
Immigration and Customs Enforcement
500 12th St. SW
Washington, DC 20536

Markwayne Mullin, Secretary
Department of Homeland Security
245 Murray Lane
Washington, DC 20528

The US Department of Homeland Security
245 Murray Lane
Washington, DC 20528

Pamela Bondi, Attorney General
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Washington, DC 20530

United States Attorney for EDPA
desiree.wilkins@usdoj.gov, anthony.stjoseph@usdoj.gov, susan.becker@usdoj.gov, and
gregory.david@usdoj.gov

Date: March 18, 2026

s/Jose C. Campos, Esq.

Jose C. Campos (PA Bar 207646)

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ATTORNEY FOR PETITIONER