

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)

Decision or Action You Are Challenging

☒ Being held on an immigration charge
☐ Other (explain): I am challenging my continued detention by U.S. Immigration and Customs Enforcement.
I am being held in immigration custody without a bond hearing despite serious medical issues, repeated transfer lack of clarity regarding my location, and extreme family hardship. Continued detention is unreasonable.
(b) Docket number of criminal case:
(c) Date of sentencing:
(a) Name and location of court that sentenced you:

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:

3. Are you currently being held on orders by:
☒ Federal authorities
☐ State authorities
☐ Other - explain:
(c) Your identification number:
(b) Address:
Address currently unknown - ICE custody (ICE Keeps moving my husband).

2. Place of confinement:
(a) Name of institution: Florida Soft Sided Facility (ICE Detention)
(b) Other names you have used: None
1. (a) Your full name: Enrique Puerto-Naranjo

Personal Information

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

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

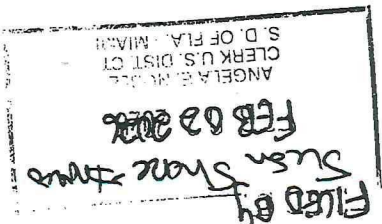
Warden, Florida Soft Sided Facility and U.S. Immigration and Customs Enforcement (ICE)

Petitioner

Enrique Puerto-Naranjo

for the

UNITED STATES DISTRICT COURT



(Supplied by Clerk of Court)

Case No.

- ☐ 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. Immigration and Customs Enforcement (ICE)

Department of Homeland Security.

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

Not available

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

Continued immigration detention without a bond hearing despite serious medical issues, repeated transfers, lack of clarity regarding detention location, and extreme family hardship.

(d) Date of the decision or action:

Ongoing Detention

Your Earlier Challenges of the Decision or Action

7.

First appeal

Did you appeal the decision, file a grievance, or seek an administrative remedy?
☒ No
☐ Yes

(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: There is no administrative appeal available for challenging prolonged immigration detention. Petitioner has sought relief through requests for release and humanitarian consideration.

Second appeal

After the first appeal, did you file a second appeal to a higher authority, agency, or court?
☒ No
☐ Yes

8.

(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. Not applicable. Petitioner is not challenging a criminal 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: 12/11/2025

(b) Date of the removal or reinstatement order: 12/09/1999

(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. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: Unlawful detention due to serious medical condition and lack of adequate medical care.

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

I suffer from diabetes and require daily medication. During my detention and repeated transfers between ICE facilities, I missed my prescribed diabetes medication for several days. This placed my health at serious risk. Continued detention without consistent medical care endangers my life and safety.

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

☐ Yes ☒ No

GROUND TWO: Unreasonable and prolonged detention due to repeated transfers and lack of clarity regarding custody and location.

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

ICE has repeatedly transferred me between facilities. My family has received conflicting information about my location, making it difficult to locate me or ensure continuity of medical care. These repeated transfers have caused confusion, distress, and unnecessary hardship, and demonstrate that my detention is unreasonable.

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

☐ Yes ☒ No

GROUND THREE: Extreme family and humanitarian hardship makes continued detention unreasonable.

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

I have been married for over 40 years. My wife is currently caring for our grandchildren and supporting our adult daughter who has mental health issues. I am the only child of my elderly parents, who are U.S. citizens and suffer from serious medical conditions. My continued detention causes severe emotional and financial hardship to my family, who depend on me for support.

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

☐ Yes ☒ No

Signature of Attorney or other authorized person, if any
Spouse of Petitioner Enrique Puerto-Morales, signing on his behalf due to detention and inability to sign at this time.
/s/ Maritza Puerto, spouse
Maritza

Date: 1/29/2020
Jawway 29, 2020-UR.

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.

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

not applicable

Declaration Under Penalty Of Perjury

15. State exactly what you want the court to do: I respectfully request that the Court grant this Petition for Writ of Habeas Corpus and order my immediate release from immigration detention. In the alternative, I request release under reasonable conditions of supervision while my immigration case is pending.

Request for Relief

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: There were no administrative or judicial appeals available to challenge prolonged immigration detention or the conditions described above.

(b) Did you present Ground Four in all appeals that were available to you?
☐ Yes ☒ No

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

GROUND FOUR: