UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. _____

ENDI JESUS MORILLO QUINTERO, Alien No.: [redacted]
Petitioner,

v.

KRISTI NOEM, Secretary of DHS, in her official capacity;
DAVID HARDIN, Sheriff of Glades County,
in his official capacity; GARRETT RIPA,
Field Office Director for ICE ERO Miami,
in his official capacity; TODD LYONS,
Acting Director of ICE, in his official capacity;
PAMELA BONDI, U.S. Attorney General,
in her official capacity;
Respondents.
_____/

PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241 AND COMPLAINT FOR INJUNCTIVE RELIEF

I. INTRODUCTION AND EMERGENCY NATURE OF RELIEF

1. This case challenges the constitutionally impermissible, medically unsafe, and life-threatening civil immigration detention of Petitioner Endi Jesus Morillo Quintero (A# [redacted].

2. Petitioner is a Venezuelan asylum seeker with no prior criminal history. Following a motor vehicle accident, he suffered a Traumatic Brain Injury (TBI). Despite severe, deteriorating neurological symptoms—including constant headaches, vision loss, cognitive fluctuation, and a 20+-pound weight loss—Respondents have denied him access to necessary specialist care, providing only Ibuprofen and water.

3. Although immigration detention is civil in nature, detention that subjects a detainee to deliberate indifference to serious medical needs and a substantial risk of

irreversible injury exceeds constitutional limits, transforming civil confinement into punitive detention.

4. Petitioner seeks an immediate Temporary Restraining Order and a Writ of Habeas Corpus ordering his release, or alternatively, immediate transfer to a non-detention medical facility capable of providing the urgent neurological assessments mandated by a board-certified neurologist.

II. JURISDICTION AND VENUE

5. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 2241, as Petitioner is currently detained by federal authorities in violation of the Constitution and laws of the United States.

6. Jurisdiction also exists under 28 U.S.C. § 1331 (federal question) and the Suspension Clause of the U.S. Constitution (Art. I, § 9, cl. 2).

7. Venue is proper in this District because Petitioner's immediate physical custodian (the Warden/Sheriff of Glades County Detention Center) and the ICE Miami Field Office Director who oversees his detention are located within this jurisdiction.

III. PARTIES

8. **Petitioner Endi Jesus Morillo Quintero** is a citizen of Venezuela. He is currently detained by ICE at the Glades County Detention Center in Moore Haven, Florida.

9. **Respondent David Hardin** is the Sheriff of Glades County and the immediate physical custodian of Petitioner at the Glades County Detention Center.

10. **Respondent Garrett Ripa** is the Field Office Director for ICE ERO Miami and retains legal custody and control over Petitioner's detention and medical authorizations.

11. **Respondents Todd Lyons, Kristi Noem, and Pamela Bondi** are named in their official capacities as the heads of ICE, DHS, and the DOJ, respectively, with ultimate authority over the enforcement of immigration laws and detention conditions.

IV. FACTUAL BACKGROUND

A. Immigration and Criminal History

12. Petitioner entered the United States near El Paso, Texas, on January 4, 2024, and was permitted to remain in the U.S. on an authorized stay/parol. He is married TO A U.S. Citizen, possesses a work permit and driver's license, and has a pending asylum application before the Immigration Court.

13. Prior to the incident giving rise to his current medical crisis, Petitioner had zero criminal history.

14. Petitioner was involved in a motor vehicle accident, which resulted in his arrest on charges including DUI, resisting arrest, leaving the scene, and driving the wrong way. He is currently accepting a plea deal for two counts of reckless driving.

15. Following his arrest on November 2, 2025, he was detained at Leon County Prison, where he paid his bond.

16. Instead of being released, ICE placed a hold on Petitioner. He was held in Tallahassee for two days, transferred to Bolton County Facility for one day, prior to being transported via "Alligator Alcatraz" for 15 days, and ultimately transferred to Glades County Detention Center on November 20, 2025, Petitioner was taken to the hospital by the sheriff and given a preliminary CAT scan. He remains in ICE custody pre-removal order while fighting his asylum case.

B. Serious Medical Condition and Deliberate Indifference

17. Ten days after the car accident, Petitioner began experiencing severe neurological symptoms.

18. Petitioner's condition has rapidly deteriorated in ICE custody. He suffers from constant night and day headaches, vision deterioration, nervous palpitations, severe forgetfulness, and nausea. He suffers from extreme anxiety, sleepiness, and an inability to eat, resulting in a drastic weight loss of 21 pounds.

19. Despite repeated sick call requests and grievances, ICE has refused to authorize evaluation by a specialist. ICE medical staff has only provided him with Ibuprofen and water, which is entirely incapable of managing his severe post-traumatic symptoms.

20. Dr. Patricia Evans, a board-certified neurologist, has reviewed Petitioner's symptoms. Dr. Evans concluded that the combination of cognitive fluctuation, progressive headaches, behavioral changes, and visual disturbance constitutes a "red-flag constellation" indicating serious medical concerns.

21. According to Dr. Evans, the standard of care requires urgent neurological evaluation, including an MRI with and without contrast, cognitive/psychometric assessment, and ophthalmologic evaluation. Dr. Evans explicitly notes that a normal initial non-contrast CT scan (such as the one Petitioner received after the crash) "does not exclude later-developing injury" like chronic subdural hematomas.

22. Dr. Evans warns that delaying this evaluation carries a foreseeable risk of permanent neurological injury, irreversible cognitive decline, seizures, life-threatening herniation, and death.

V. CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF
Violation of Fifth Amendment Due Process
(Unconstitutional Conditions of Confinement / Deliberate Indifference)

23. Petitioner realleges the foregoing paragraphs.

24. The Fifth Amendment prohibits the government from subjecting civil immigration detainees to punitive conditions of confinement or acting with deliberate indifference to their serious medical needs.

25. Petitioner suffers from a serious, documented medical need (TBI symptoms) that, if untreated, poses a substantial risk of serious harm, deterioration, or death.

26. Respondents have actual and constructive knowledge of Petitioner's condition through medical intake screenings, repeated sick call requests, and visible physical deterioration (21-pound weight loss).

27. Despite this knowledge, Respondents have acted with deliberate indifference by denying authorization for specialist care, failing to provide ordered diagnostic testing (MRI), and relying on detention-based care (Ibuprofen) that is grossly incapable of managing his life-threatening condition.

28. Because continued detention under these medical conditions exposes Petitioner to avoidable suffering and progressive deterioration, his detention is not reasonably related to any legitimate governmental objective and has become unconstitutionally punitive.

VI. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Assume jurisdiction over this matter;
2. Issue a Temporary Restraining Order and Preliminary Injunction enjoining Respondents from continuing Petitioner's detention under the current medically unsafe conditions;
3. Issue a Writ of Habeas Corpus ordering Petitioner's immediate release, or in the alternative, directing his immediate transfer to a non-detention medical facility capable of providing the urgent neurological MRI and specialist care mandated by Dr. Patricia Evans;
4. Award Petitioner reasonable attorney's fees and costs under the Equal Access to Justice Act; and
5. Grant any further relief the Court deems just and proper.

Respectfully submitted,

LIBERTAD CON HABEAS LAW GROUP, PLLC

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By: */s/ Sara Saba*
Sara J. Saba, Esq.
Florida Bar No. 911011
Counsel for Petitioner

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I, Sara Jiries Saba, represent Petitioner Endi Jesus Morillo Quintero and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge, information, and belief, based upon my review of documents provided by Petitioner and communications with Petitioner.

Dated: March 24, 2026

By: */s/ Sara Jiries Saba*
Sara Jiries Saba, Esq.
Florida Bar No. 911011
Attorney for Petitioner

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 24, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system. Because Respondents have not yet appeared in this action and are not yet registered CM/ECF users for this case, I certify pursuant to S.D. Fla. L.R. 5.2(a) that a true and correct copy of the foregoing document, the Summons, and all attachments will be served via **Certified Mail, Return Receipt Requested**, upon the following:

David Hardin, Sheriff of Glades County *(Immediate Physical Custodian)*

Glades County Detention Center 1297 East SR 78 Moore Haven, FL 33471

Jason A. Reding Quiñones, U.S. Attorney

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

Pamela Bondi, U.S. Attorney General

U.S. Department of Justice 950 Pennsylvania Avenue NW Washington, DC 20530

Garrett Ripa, Field Office Director

Miami Field Office ICE/ERO 865 SW 78th Avenue, Suite 101 Plantation, FL 33324

Todd Lyons, Acting Director

U.S. Immigration and Customs Enforcement 500 12th St SW Washington, DC 20536

Kristi Noem, Secretary of Homeland Security

Office of the General Counsel 2707 Martin Luther King Jr. Ave SE Washington, DC 20528

Respectfully Submitted,

By: */s/ Sara Saba*
Sara J. Saba, Esq.
Florida Bar No. 911011
Counsel for Petitioner

LIST OF EXHIBITS

Exhibit	Description
Exhibit 1	Declaration of Endi Jesus Morillo Quintero
Exhibit 2	Medical Assessment of Dr. Patricia Evans, Board-Certified Neurologist
Exhibit 3	ICE Detainee Locator printout
Exhibit 4	Murillo Plea deal March 20, 2026
Exhibit 5	Medical Record from Hendry Medical, Dec 2025