

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

CRESENCIO LUIS LARA-ESCALERA,)
)
 Petitioner,)
)
 v.)
)
 JASON STREEVAL, Warden, Stewart)
 Detention Center; KRISTEN SULLIVAN,)
 Acting Director of the Atlanta Field Office,)
 U.S. Immigration Customs Enforcement;)
 TODD LYONS, Acting Director of Immigration)
 Customs Enforcement; U.S. IMMIGRATION)
 AND CUSTOMS ENFORCEMENT (“ICE”);)
 KRISTI NOEM, Secretary of the U.S. Department)
 of Homeland Security; U.S. DEPARTMENT)
 OF HOMELAND SECURITY (“DHS”);)
 and PAMELA BONDI, Attorney General of)
 the United States, in their official capacities,)
)
 Respondents.)
 _____)

Case No. 4:26-cv-469

**PETITION FOR WRIT OF
HABEAS CORPUS**

INTRODUCTION

1. Petitioner Cresencio Luis Lara-Escalera is a citizen and national of Mexico and is currently detained by the DHS at Stewart Detention Center in Lumpkin, Georgia. Mr. Lara-Escalera suffers from mental health conditions that significantly affect his ability to understand and participate in complex legal proceedings. *See* Exhibit A, at 22-26. Because of these conditions, an Immigration Judge (“IJ”) determined that Mr. Lara-Escalera was not competent to proceed in Immigration Court without safeguards and appointed a qualified representative (“QR”) to assist him. *See* Exhibit A, at 26.

2. On June 27, 2025, the IJ granted Mr. Lara-Escalera's request for Deferral of Removal protection under the Convention Against Torture ("CAT"). *See* Exhibit A, at 41. The IJ ultimately concluded that Mr. Lara-Escalera could not safely be returned to Mexico. *See* Exhibit A, at 41-41. The Immigration Court found that, if removed, he would more than likely face severe harm due to [REDACTED] and [REDACTED] in Mexico. *See* Exhibit A, IJ Decision Granting DCAT ("IJ Decision") at 40.

3. Despite the Immigration Court's recognition of Mr. Lara-Escalera's significant vulnerabilities, he remains detained at the Stewart Detention Center nearly eight (8) months past the IJ's finalized order. *Id.* Additionally, ICE has thus far either been unable or unwilling to provide documentation confirming that either a three-month or a six-month Post-Order Custody Review ("POCR") has been completed for Mr. Lara-Escalera during his time in their custody. *See* Exhibit B, Documents Regarding Third Country Removal, at 47.

4. Additionally, the DHS has indicated that its objective is now to deport Mr. Lara-Escalera to a third country since it cannot repatriate him to Mexico. *Id.* At 44-45. The DHS has specifically mentioned the potential for removal to either Ecuador or Uganda. *Id.* Nevertheless, there is no evidence that either nation has or would consent to his admission or that removal to either nation is reasonably foreseeable. *See* Exhibit C, D, E.

5. Mr. Lara-Escalera remains in custody despite the absence of any viable prospect of removal or meaningful review, and despite the substantial mental health challenges that render prolonged detention particularly harmful. He now seeks habeas relief under 28 U.S.C. § 2241 because his continued detention without meaningful procedural safeguards and without a reasonably foreseeable prospect of removal violates the Due Process Clause of the Fifth Amendment.

JURISDICTION

6. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*

7. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

8. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All-Writs Act, 28 U.S.C. § 1651.

VENUE

9. Venue is proper because Mr. Lara-Escalera is in Respondents' custody in Lumpkin, Georgia which is within the jurisdiction of this District. Venue is further proper in this District because Respondents are officers, employees, or agencies of the United States and a substantial part of the events or omissions giving rise to Mr. Lara Escalera's claims occurred in this District. 28 U.S.C. § 1391(e).

REQUIREMENTS OF 28 U.S.C. §§ 2241, 2243

10. The Court must grant the petition for writ of habeas corpus or issue an order to show cause to the respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return "within *three days* unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added).

11. Courts have long recognized the significance of the habeas statute in protecting

individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

12. Mr. Lara-Escalera is “in custody” for the purpose of § 2241 because he is arrested and detained by Respondents.

PARTIES

13. Petitioner is a citizen and national of Mexico. Petitioner is currently detained at the Stewart Detention Center. He is in custody and under the direct control of Respondents and their agents.

14. Respondent Jason Streeval is the Warden of the Stewart Detention Center, and he has immediate physical custody of Petitioner pursuant to the facility’s contract with U.S. Immigration and Customs Enforcement to detain noncitizens and is a legal custodian of Petitioner.

15. Respondent Kristen Sullivan is sued in her official capacity as the Acting Director of the Atlanta Field Office of U.S. Immigration and Customs Enforcement. Respondent Sullivan is a legal custodian of Petitioner and has authority to release him.

16. Respondent Todd Lyons is sued in his official capacity as the Acting Director of U.S. Immigration and Customs Enforcement. Respondent Lyons is a legal custodian of Petitioner and has authority to release him.

17. Respondent Kristi Noem is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security (DHS). In this capacity, Respondent Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees U.S. Immigration and Customs Enforcement, the component agency responsible for Petitioner’s

detention. Respondent Noem is a legal custodian of Petitioner and is charged with faithfully administering the immigration laws of the United States.

18. Respondent Pamela Bondi is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that capacity, she has authority over the DOJ and is charged with faithfully administering the immigration laws of the United States.

19. Respondent U.S. Immigration Customs Enforcement (ICE) is the federal agency responsible for custody decisions relating to non-citizens charged with being removable from the United States, including the arrest, detention, and custody status of non-citizens.

20. Respondent U.S. Department of Homeland Security (DHS) is the federal agency that has authority over the actions of ICE and all other DHS Respondents.

21. This action is commenced against all Respondents in their official capacities.


STATEMENT OF FACTS

22. Mr. Lara-Escalera is a citizen and national of Mexico. *See* Exhibit A, at 18. On September 16, 2020, DHS initiated removal proceedings by serving him with a Notice to Appear (“NTA”) charging him as removable under § 212(a)(6)(A)(i) of the Immigration and Nationality Act (“INA”). *Id.* at 18-19. DHS filed the NTA with the Immigration Court on September 28, 2020. *Id.*

23. On September 29, 2020, DHS filed medical and mental health records with the Immigration Court to inform it of a potential competency issue. *Id.* at 19. Following a competency hearing on October 8, 2020, the court found Mr. Lara-Escalera to be incompetent by a preponderance of the evidence. *Id.* A qualified representative (“QR”) was appointed to represent him. *Id.*

24. On January 15, 2021, the QR filed a Form I-589 application for asylum and withholding of removal under the INA. *Id.* Mr. Lara-Escalera was found removable by the Immigration Court on January 21, 2021, and Mexico was designated as the country of removal. *Id.* Mr. Lara-Escalera was then released on his own recognizance on or around January 21, 2021. *Id.*

25. On or around June 25, 2024, Mr. Lara-Escalera was once again detained at Stewart Detention Center. *Id.* He underwent additional mental health evaluations on October 24, 2024. *Id.*

26. On February 6, 2025, the court conducted an individual merits hearing. *Id.* Mr. Lara-Escalera sought withholding of removal under the INA, as well as deferral of removal under the CAT. *Id.* In its final order on June 27, 2025, the Immigration Court denied asylum and statutory withholding of removal but granted deferral of removal under the CAT. *Id.* at 41. The court determined that Mr. Lara-Escalera had demonstrated that it was more likely than not that he would face severe harm if returned to Mexico because of  and the circumstances he would face there. *Id.* at 40-41.

27. Because removal to Mexico is barred by the Immigration Court's order, DHS is exploring the possibility of removing Mr. Lara Escalera to either Ecuador or Uganda instead. *See* Exhibit B. At present, however, there is no indication that either country has agreed to accept Mr. Lara-Escalera, nor is there any evidence that the prospect of his removal to either country is reasonably foreseeable. *See* Exhibit B, C.

28. On January 23, 2026, ICE formally served Mr. Lara-Escalera with a Notice of Removal to Ecuador, (Exhibit B at 43) and a Third Country Screening was conducted on January 29, 2026, to determine the likelihood of torture in Ecuador. *Id.* at 45. Notably this screening was

conducted without counsel present, and the asylum officer determined that Mr. Lara-Escalera did not establish a likelihood of persecution or torture in Ecuador. *Id.*

29. Despite the DHS publishing a July 23, 2025 Agreement between the United States and Ecuador relating to the transfer of third-country nationals to Ecuador (Exhibit D), the exact eligibility requirements and total capacity for transfers remains unclear.¹ Based on publicly available data, as of mid-January 2026, 113 people have been designated for removal under the cooperative agreement, with no known transfers to date.²

30. Similarly, Uganda and the United States reached a cooperative agreement on July 29, 2025, relating to the transfer of third-country nationals to Uganda. *See* Exhibit E. However, the exact eligibility requirements and total capacity for transfers remains unclear.³ Based on publicly available data, as of December 2025, 95 asylum seekers were designated for removal first to Uganda under the cooperative agreement.⁴ However, as of mid-January 2026, no known transfers to Uganda have occurred under this agreement.⁵ Furthermore, public statements from Uganda's Ministry of Foreign Affairs indicate that they will not accept individuals with criminal records and that they prefer the transfer of individuals originally from African countries. *See* Exhibit C. Thus, under that standard, Mr. Lara-Escalera is ineligible for transfer to Uganda.

31. Consequently, Mr. Lara-Escalera remains in custody while DHS allegedly pursues speculative third-country removal options. *See* Exhibit B. To date, ICE has not provided any documentation that demonstrates tangible progress toward that objective. *Id.*

¹ *See Ecuador*, THIRD COUNTRY DEPORTATION WATCH, Refugees Int'l & Human Rights First, <https://www.thirdcountrydeportationwatch.org/ecuador> (last updated Mar. 11, 2026).

² *Ecuador*, *supra* note 1.

³ *See Uganda*, THIRD COUNTRY DEPORTATION WATCH, Refugees Int'l & Human Rights First, <https://www.thirdcountrydeportationwatch.org/uganda> (last updated Mar. 11, 2026).

⁴ *Uganda*, *supra* note 3.

⁵ *Id.*

32. This habeas petition is therefore filed to secure Mr. Lara-Escalera's statutory and constitutional protections owed to all individuals in the United States, including non-citizens, and to ensure that his continued detention does not subject him to unnecessary harm and deprivation.

LEGAL FRAMEWORK

I. Statutory, Regulatory, and Constitutional Framework Governing Post-Order

Detention.

33. 28 U.S.C. § 2241 empowers this Court to grant habeas relief, including immediate or conditional release, where a noncitizen's continued immigration detention violates the Constitution or exceeds statutory authority.

34. Noncitizens in immigration proceedings are entitled to Due Process under the Fifth Amendment of the U.S. Constitution. *Reno v. Flores*, 507 U.S. 292, 306 (1993). Immigration detention is a form of civil confinement that "constitutes a significant deprivation of liberty that requires due process protection." *Addington v. Texas*, 441 U.S. 418, 425 (1979).

35. Immigration detention is civil, not punitive, and must bear a reasonable relation to a legitimate government purpose. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

36. Post-removal-order detention beyond six months is presumptively unreasonable, absent a showing by the government that removal is significantly likely in the reasonably foreseeable future. *Zadvydas*, 533 U.S. at 701.

37. Even where post-order detention is authorized, ICE must conduct mandatory custody reviews under 8 C.F.R. § 241.4 (2006). Once detention becomes prolonged, those regulatory reviews are constitutionally insufficient on their own and must be supplemented by an individualized bond hearing before a neutral decisionmaker. *See Diouf v. Napolitano*, 634 F.3d 1081, 1091 (9th Cir. 2011).

II. Detention and Release of Noncitizens Granted Withholding of Removal Under the Convention Against Torture

38. When a noncitizen has a final withholding grant, they cannot be removed to the country or countries for which they demonstrated a sufficient likelihood of persecution. *See* 8 U.S.C. § 1231 (b)(3)(A). Although ICE is authorized to remove noncitizens granted withholding of removal to alternative countries, the INA specifies restrictive criteria for identifying appropriate countries. *See* 8 U.S.C. §§ 1231 (b)(2)(D)-(E).

39. Before ICE may effect noncitizen's removal to an alternative country of removal, ICE must undergo further proceedings, including giving the noncitizens notice and opportunity to express fear of deportation. *See Jama v. ICE*, 543 U.S. 335, 348 (2005) ("If [noncitizens] would face persecution or other mistreatment in the country designated under §1231(b)(2), they have a number of available remedies: asylum, § 1158(b)(1); withholding of removal, § 1231(b)(3)(A); [and] relief under an international agreement prohibiting torture, *see* 8 C.F.R. §§ 208.16(c)(4), 208.17(a).")

40. Without the consent of an alternative country, removal is not reasonably foreseeable, and the detention pending exceeds what § 1231(a)(6) authorizes.

CLAIMS FOR RELIEF

COUNT ONE

Violation of 8 U.S.C. § 1231(a)(6) Unlawful Post-Order Detention

41. The allegations in the above paragraphs are realleged and incorporated herein.

42. Under 8 U.S.C. § 1231(a)(6), the government may detain a noncitizen beyond the 90-day removal period only where the noncitizen is inadmissible, removable on certain grounds, or has been determined to be a risk to the community or unlikely to comply with the order of removal. The statute does not permit indefinite detention. As the Supreme Court held in *Zadvydas*,

§ 1231(a)(6) must be read to limit post-removal-order detention to a period reasonably necessary to bring about the noncitizen's removal from the United States. *Id.* at 689.

43. While the government has discretion to detain individuals under § 1231(a)(6), this discretion is not “unlimited” and must comport with constitutional due process. *Id.* at 697.

44. Under *Zadvydas*, post-removal-order detention beyond six months is presumptively unreasonable unless the government demonstrates a significant likelihood of removal in the reasonably foreseeable future. *Id.* at 701. The court provided a bright-line rule, holding that after six months in post-removal-order status, if the detainee provides “good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future, the Government must respond with evidence sufficient to rebut that showing.” *Id.* If the government does not meet its burden, the noncitizen must be released from confinement. *See id.*

45. The *Zadvydas* court made clear that this standard is not static, it tightens as detention lengthens. *Id.* at 678 (“For detention to remain reasonable, as the period of post-removal confinement grows, what counts as ‘reasonably foreseeable future’ conversely would have to shrink.”). Mr. Lara-Escalera has now been detained for nearly eight months past his final removal order. His detention has not merely crossed the six-month presumptive threshold; it has substantially exceeded it. Consequently, the government bears a greater evidentiary burden to demonstrate a substantial likelihood of removal than it did at six months, and that burden only increases with each passing day.

46. The Supreme Court has made clear that there is no congressional intent to authorize indefinite detention; once removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute or the Constitution. *Id.* at 699.

47. Petitioner has met his initial burden under *Zadvydas*. The IJ’s order granting

deferral of removal under the CAT is a legal bar to Petitioner's return to Mexico. *See Exhibit A*. This is not a case where removal is merely delayed by logistical or diplomatic issues. The Government is legally prohibited from returning Petitioner to Mexico and must secure the consent of a third country. Under §§ 1231(b)(1)-(3), Congress established the statutory process for designating countries to which noncitizens may be removed. DHS has identified Ecuador and Uganda as potential destinations, but there are no confirmed transfers under either country. *See Exhibit B, C, D, E*. Specifically, Ecuador has stated that it will accept individuals on a case-by-case basis (Exhibit D), and there is no record to confirm Ecuador has accepted Mr. Lara-Escalera.⁶

48. The Government's position rests on references to speculative future possibilities, which is precisely the "multiple unguaranteed future events" courts have found insufficient to establish foreseeability. *See Salad v. Dep't of Corrections*, 769 F. Supp. 3d 913, 923 (D. Alaska 2025) (rejecting government's foreseeability argument as "simply too attenuated" and "too disconnected from the statute's purpose" where removal depended on contingent steps the government could not guarantee). The Government has produced no evidence of confirmed transfers, no evidence that Ecuador has agreed to accept Mr. Lara-Escalera, and no removal timeline. *See Exhibit B, D*.

49. Further, the Government cannot invoke Mr. Lara-Escalera's mental health condition as an independent basis for continued detention. The Fifth Circuit holds that § 1231(a)(6) does not authorize indefinite detention of a person whose removal is not reasonably foreseeable even where the government asserts mental illness renders that person a community risk. *Tran v. Mukasey*, 515 F.3d 478, 484 (5th Cir. 2008). Section 1231(a)(6) applies uniformly to all aliens and mental illness creates no exception. *Id.* (citing *Clark v. Martinez*, 543 U.S. 371, 378–81 (2005)).

⁶ *See Ecuador, supra* note 1.

The IJ's competency finding makes prolonged detention of Mr. Lara-Escalera more constitutionally troubling, not permissible.

50. He is subject to a final order of removal (Exhibit A) and has been detained by Respondents for nearly eight (8) months beyond his final removal order. *See e.g.*, Exhibit B. There is not a significant likelihood that he will be removed to either Ecuador or Uganda in the reasonably foreseeable future.⁷

51. For these reasons, Respondents are detaining Mr. Lara-Escalera in violation of 8 U.S.C. § 1231(a)(6), and he is entitled to immediate release from custody.

COUNT TWO
Violation of the Fifth Amendment Right to Due Process
(Lack of Meaningful Custody Review)

52. The allegations in the above paragraphs are realleged and incorporated herein.

53. Even where detention is statutorily authorized, prolonged civil detention must be accompanied by meaningful, individualized custody review consistent with due process. *Zadvydas*, at 692; *see also*, 8 C.F.R. § 241.4. The basic due process doctrine requires that an individual be afforded requisite process, including notice and an opportunity to be heard, before being deprived of a liberty interest. *Mathews v. Eldridge*, 424 U.S. 319, 322 (1976).

54. The Due Process Clause of the Fifth Amendment further prohibits civil detention that is not reasonably related to a legitimate governmental purpose. U.S. CONST. amend. V. Civil immigration detention violates substantive due process if it is not reasonably related to its statutory purpose. *Zadvydas*, at 690 (citing *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). Detention must "bear a reasonable relation to the purpose for which the individual was committed." *Demore v. Kim*, 538 U.S. 510, 527 (2003).

⁷ *See Ecuador*, *supra* note 1; *see also*, *Uganda*, *supra* note 3.

55. Under the APA, a court shall “hold unlawful and set aside agency action” that is “arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law.” 5 U.S.C. § 706(2)(A). “Where the rights of individuals are affected, it is incumbent upon agencies to follow their own procedures... even where the internal procedures are possibly more rigorous than otherwise would be requires.” *Morton v. Ruiz*, 415 U.S. 1999, 235 (1974). ICE’s failure to follow its own mandatory review procedures under 8 C.F.R. § 241.4 is the kind of arbitrary agency action the APA requires courts to set aside.

56. Under § 241.4(k)(1)(i), ICE must conduct an initial custody review before the 90-day removal period expires. If the detainee remains in custody three months later, a second review must follow. *See* § 241.4(k)(1)(ii). These reviews must be individualized, must account for the detainee’s mental health records, and must result in a written decision stating the reasons for continued detention. *See* §§ 241.4(d), (f)(3). At the 180, days the process is no longer sufficient on its own because it doesn’t provide for an in-person hearing, it places the burden on the alien rather than the government, and it does not provide for a decision by a neutral arbitrator such as in immigration judge. *See Diouf v. Napolitano*, 634 F.3d 1081, 1091 (9th Cir. 2011). At that point, the Constitution requires a bond hearing before an immigration judge at which the government bears the burden of establishing flight risk or danger to the community. *See Diouf*, 643 F.3d, at 1092. Mr. Lara-Escalera has been detained for nearly eight months past his final removal order, far exceeding that threshold, and no such hearing has been provided.

57. Despite nearly eight months of post-order detention, ICE has been unable or unwilling to produce documentation confirming the 90-day review under § 241.4(k)(1)(i) or the subsequent review under § 241.4(k)(2)(ii) was completed. *See* Exhibit B, at 46-47. Since the

Government cannot produce records of reviews it was required to conduct, it cannot argue those reviews were constitutionally adequate.

58. Respondents have failed to provide Mr. Lara-Escalera with a constitutionally adequate custody determination that meaningfully considers the feasibility of removal, the length of detention, his current health condition, or any reasonable alternatives to detention. *See* Exhibit B.

59. In *Mathews*, 424 U.S. at 322, the constitutional analysis strongly favors Petitioner. The private interest in freedom from prolonged civil detention grows more substantial with each passing month. *See Diouf*, at 1091. The risk of erroneous deprivation is high for two reasons. First, no neutral decisionmaker has reviewed the necessity of continued detention and any reviews conducted were performed by the detaining agency itself. *Id.*; *see also*, Exhibit C. Second, the Immigration Court established Petitioner incompetent to participate in his own proceedings without a qualified representative (Exhibit A, at 19) a finding that heightens the risk erroneous deprivation in any review process that lacks a neutral arbiter. *Id.* The burden on the government of providing an individualized hearing before an immigration judge is reasonable and well-established. *Id.* at 1092. Because Mr. Lara-Escalera's continued detention has no reasonable relation to its statutory purpose of effecting removal, the detention violates substantive due process under the Fifth Amendment. *See* U.S. CONST. amend. V.

60. For these reasons, Mr. Lara-Escalera's continued detention violates the Due Process Clause of the Fifth Amendment, and all three *Mathews* factors favor requiring release from custody; or, in the alternative, an individualized bond hearing at which the government bears the burden of justifying continued detention. *See e.g.*, U.S. CONST. amend. V; *see also*, *Mathews*, 424 U.S. at 322.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests this Court to grant the following:

- (1) Assume jurisdiction over this matter;
- (2) Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three (3) days;
- (3) Declare that Mr. Lara-Escalera's continued detention violates 8 U.S.C. § 1231(a)(6) and the Due Process Clause of the Fifth Amendment.
- (4) Issue a Writ of Habeas Corpus ordering Respondents to release Mr. Lara-Escalera from custody; or, in the alternative, order a prompt, individualized bond hearing at which Respondents bear the burden of justifying continued detention and at which Mr. Lara-Escalera is afforded a meaningful opportunity for release subject to reasonable conditions of supervision;
- (5) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
- (6) Grant any further relief this Court deems just and proper.

Respectfully submitted,

Dated: March 25th, 2026

s/ Sarah Wilson

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

I represent Petitioner, Crescencio Luis Lara-Escalera, 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.

Dated this 25th day of March 2026.

/s/ Sarah Wilson
SARAH WILSON