

**PETITION FOR WRIT OF HABEAS CORPUS (28
U.S.C. § 2241)**

1:26-cv-00160

I. INTRODUCTION

Petitioner is a noncitizen currently detained by Immigration and Customs Enforcement (ICE). Petitioner was previously granted protection under the Convention Against Torture (CAT) and released under an Order of Supervision after demonstrating compliance with all conditions imposed by ICE. Despite full compliance, Petitioner was re-detained at a routine check-in without explanation.

This continued detention is unlawful because there is no significant likelihood of removal in the reasonably foreseeable future and the detention violates due process.

II. JURISDICTION

This Court has jurisdiction under 28 U.S.C. § 2241 because Petitioner is in custody in violation of the Constitution and laws of the United States.

III. FACTUAL BACKGROUND

Petitioner was granted CAT protection on October 20, 2023. Following that decision, Petitioner was released under an Order of Supervision and complied fully with all

C. Lack of Statutory Authority

Detention under 8 U.S.C. § 1231 must be tied to removal. Where removal is not foreseeable, continued detention exceeds statutory authority.

V. RELIEF REQUESTED

Petitioner respectfully requests that this Court:

1. Order immediate release under appropriate supervision; or
2. Order an individualized bond hearing before an immigration judge.

Petitioner requests any additional relief deemed just and proper.

VI. DECLARATION

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

Respectfully submitted,

 _____ [Signature]

Jonathan Alexander Molina

Date:

Certificate of Service

CERTIFICATE OF SERVICE

This is to certify that I, Jonathan Alexander Molina, Pro Se, and the above-captioned case.
On 27 OF march 2026, I served a copy of the
foregoing brief by Fed Ex on the following parties:

1. Warden, Bluebonnet Detention Facility

2. Kristi Noem

3. Pam Bondi

Dated 27 of March, 2026.

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