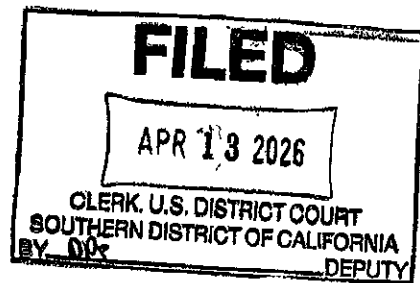


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA



ROGER FRYE LARGO,


Petitioner,

'26CV2368 TWR DDL

v.


John Doe, Warden, OTAY MESA DETENCION CENTER

Alejandro Mayorkas,
Secretary of Homeland Security.

U.S. Immigration and Customs Enforcement (ICE), a component of Department of
Homeland Security;
Respondents.

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

1. Information About the Petitioner

- Full Name: ROGER FRYE LARGO,
- A-Number: 
- Nationality: COLOMBIA
- Detention Facility: Otay Mesa Detention Center, San Diego, CA
- Date of ICE Detention: June, 2025

2. Legal Grounds

Petitioner is detained pursuant to immigration authority; however, his continued detention violates the Due Process Clause of the Fifth Amendment to the United States Constitution.

ICE has failed to provide Petitioner with an individualized bond hearing at which the Government bears the burden of proving, by clear and convincing evidence, that Petitioner poses either a danger to the community or a flight risk.

Petitioner has no criminal history, has strong community ties, and has complied with all prior immigration requirements. His continued detention without a meaningful opportunity to challenge the necessity of confinement is arbitrary and unreasonable.

Federal courts have authority under 28 U.S.C. § 2241 to review the legality of civil immigration detention and to order release where detention violates constitutional due process protections.

3. Claim

ICE has not met its constitutional burden to justify Petitioner's continued detention.

Petitioner is not a danger to the community and does not pose a flight risk. He has no criminal record, has established residence in the United States, and has demonstrated a history of compliance with immigration authorities. The Government has failed to show any changed circumstances, violation of conditions, or lawful justification warranting continued confinement. Detention under these circumstances constitutes an arbitrary deprivation of liberty in violation of the Fifth Amendment.

4. Relief Requested

Petitioner respectfully requests that this Honorable Court:

- a. Grant the Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241;
- b. Order Respondents to provide Petitioner with an individualized bond hearing before an Immigration Judge within a reasonable time, at which the Government bears the burden of proving by clear and convincing evidence that Petitioner poses a danger to the community or a flight risk;
- c. In the alternative, order Petitioner's release under appropriate conditions of supervision pending resolution of his immigration proceedings;
- d. Grant any other relief the Court deems just and proper.

Respectfully submitted,

Signature

/s/ ROGER FRYE LARGO

Petitioner, pro se

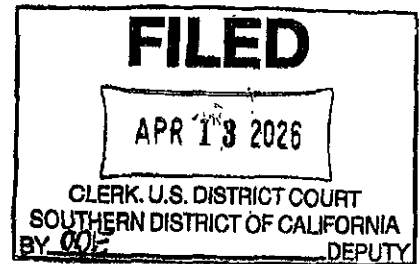


Otay Mesa Detention Center

7488 Calzada de la Fuente San Diego, CA 92154

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA**

ROGER FRYE LARGO,
Petitioner,
v.



**John Doe, WARDEN, OTAY MESA DETENTION CENTER;
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE),**

Respondents.

Respondents.

MOTION FOR IMMEDIATE RELEASE OR, IN THE ALTERNATIVE, FOR A BOND HEARING

Petitioner respectfully moves this Honorable Court for an order granting immediate release from immigration detention, or in the alternative, ordering a prompt bond hearing while the Court considers the accompanying Petition for Writ of Habeas Corpus.

Petitioner has been detained by Immigration and Customs Enforcement (ICE) at the OTAY MESA DETENCION CENTER During this time, Petitioner has remained in custody without an individualized bond hearing before an immigration judge. This prolonged and indefinite detention without meaningful procedural safeguards violates the Due Process Clause of the Fifth Amendment to the United States Constitution.

Petitioner is not a danger to the community and does not pose a flight risk. Petitioner has strong family and community ties and is willing to comply with any conditions of release imposed by the Court. Continued detention without an opportunity for release on bond is unreasonable and constitutionally excessive.

Federal court retain authority to order release or require a bond hearing where immigration detention becomes prolonged and unjustified. Given the length of detention and the absence of an individualized bond determination, relief is warranted in this case.

WHEREFORE, Petitioner respectfully requests that this Court order his immediate release from custody, or in the alternative, order Respondents to provide a prompt bond hearing before an immigration judge, and grant any other relief the Court deems just and proper.

Respectfully submitted,

/s/ ROGER FRYE LARGO
Petitioner, pro se



My detention occurred on Saturday, June 7, 2025, at approximately 9:00 a.m., as I was leaving my home to meet with my attorney. Suddenly, three vehicles without any markings or logos blocked my path, forcing me to stop. A man exited one of the vehicles and, in a hostile manner, asked me if I had any identification.

I proceeded to show, from my phone, photographs of all my documents, including my Texas ID, work permit, Social Security, and driver's license, all valid and issued in Texas. I also showed the date of my next court hearing, which was scheduled for January 6. The officer then stated that my court date had been moved forward and proceeded to place me in handcuffs and shackles while placing me into his vehicle.

I asked why I was being detained without any warrant. The officer responded that it did not matter. While inside the vehicle, I was asked about a person named Miguel Ángel Medina. I responded that I knew him, but that I had not had any contact with him for more than a year. I also told the officer that, if he wished, he could search my home with my consent.

The day before, my son had been detained, even though he also had all his documents in order. Another person was also detained while leaving the house. For that reason, I was on my way to meet with an attorney. In total, four additional people were detained in connection with these events.

I want to make clear that at no time during my detention was I shown or notified of any warrant. The individuals and vehicles involved never identified themselves. The entire situation was arbitrary, and I did not understand what was happening until I arrived at a detention center.

Once there, I was asked why I had been detained. After reviewing my information, I was told that there was no warrant or record against me and that I should not have been detained. At that time, I saw my son, who had been detained the previous day and who also had all his documents in order and no criminal record. Although I was able to see him, we were not allowed to speak, and I was later transferred and separated from him.

As of today, I have been detained for more than 11 months, despite having complied with all my court hearings, having valid documentation, and having no criminal record.

/s/ ROGER FRYE LARGO
Petitioner, pro se

A black rectangular box with a white 'X' inside, used to redact the signature of the petitioner.

**United States District Court
Southern District of California**


Re: Habeas Corpus Petition --

ROGER FRYE LARGO



Petitioner,

To the Honorable Court:

I respectfully submit the enclosed Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 on behalf of Mr. ROGER FRYE LARGO, , who is currently detained at **Otay mesa detention center**. Petitioner seeks judicial review of the legality of his continued civil immigration detention and requests appropriate relief as set forth in the Petition, including an individualized bond hearing or release under reasonable conditions of supervision.

Petitioner is a national of COLOMBIA and is presently detained by U.S. Immigration and Customs Enforcement **7488 Calzada de la Fuente San Diego, CA 92154**. He has no criminal history and does not pose a danger to the community or a flight risk.

Respectfully,

/s/ ROGER FRYE LARGO

Petitioner, pro se



Otay Mesa Detention Center

7488 Calzada de la Fuente San Diego, CA 92154