

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF GEORGIA  
COLUMBUS DIVISION**

FILED  
APR 22 2026  
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WILLIAM SANCHEZ REYES,  
Petitioner,

v.

Civil Action No. \_\_\_\_\_

JASON STREEVAL, Warden, Stewart Detention  
Center; MARKWAYNE MULLIN, Secretary of  
Homeland Security; and TODD BLANCHE, Acting  
Attorney General of the United States,  
Respondents.

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**PETITION FOR WRIT OF HABEAS CORPUS  
PURSUANT TO 28 U.S.C. § 2241**

Petitioner William Sanchez Reyes, proceeding pro se, respectfully petitions this Court pursuant to 28 U.S.C. § 2241 for a writ of habeas corpus directing his immediate release from immigration detention, or in the alternative, ordering an individualized bond hearing before an immigration judge with the burden of proof on the government. In support thereof, Petitioner states:

**I. JURISDICTION AND VENUE**

This Court has jurisdiction under 28 U.S.C. § 2241 to grant writs of habeas corpus to persons in custody in violation of the Constitution or laws of the United States. *Zadvydas v. Davis*, 533 U.S. 678 (2001); *Demore v. Kim*, 538 U.S. 510 (2003). A § 2241 petition is the proper vehicle to challenge civil immigration detention. Venue lies in this district because Petitioner is confined at Stewart Detention Center, Lumpkin, Georgia, within the Middle District of Georgia, Columbus Division. 28 U.S.C. § 2241(d). The Warden of Stewart Detention Center is Petitioner's immediate custodian for purposes of § 2241. *Rumsfeld v. Padilla*, 542 U.S. 426, 447 (2004).

## **II. PARTIES**

Petitioner WILLIAM SANCHEZ REYES is a native and citizen of Mexico, Alien Registration Number A- date of birth  born in Las Choapas, Veracruz, Mexico. He is currently confined at Stewart Detention Center, 146 CCA Road, Lumpkin, Georgia 31815.

Respondent JASON STREEVAL is the Warden of Stewart Detention Center and Petitioner's immediate custodian. He is named in his official capacity.

Respondent MARKWAYNE MULLIN is the Secretary of Homeland Security, responsible for immigration enforcement and civil detention. He is named in his official capacity. See 6 U.S.C. § 557.

Respondent TODD BLANCHE is the Acting Attorney General of the United States, with supervisory authority over the Executive Office for Immigration Review. He is named in his official capacity. See 8 U.S.C. § 1103(g).

## **III. STATEMENT OF FACTS**

### **A. Arrest on Minor Traffic Infraction and Immediate Bond Payment**

On the morning of April 5, 2026, at approximately 6:00–7:00 a.m., local law enforcement in Columbia County, Georgia, stopped and arrested Petitioner for driving without a valid driver's license—a minor, non-violent, non-criminal infraction. Petitioner was booked into the Columbia County Jail.

Later the same day, Sunday, April 5, 2026, a state bond of \$1,100.00 was paid on Petitioner's behalf. A Fines & Fees receipt (No. 25211, Case No. 26-004771, Surety: Elorza, Jesus Gustavo, dated April 5, 2026) confirms the payment. Petitioner was entitled to immediate release from state custody.

### **B. Warrantless Civil Immigration Arrest and Transfer to Stewart**

Before Petitioner could be released on the paid bond, agents of Immigration and Customs Enforcement ("ICE") took him into civil immigration custody. No arrest warrant was presented. No judicial authorization was obtained. Petitioner was given no notice of the basis for arrest under the immigration laws. He was not informed of any final order of removal.

On the morning of Monday, April 6, 2026, ICE transported Petitioner from Columbia County Jail to an ICE facility in the Atlanta, Georgia area. On approximately Thursday, April 9–10, 2026, he was transferred again to Stewart Detention Center in Lumpkin, Georgia, where he remains detained to this day. No individualized bond hearing has been provided.

### **C. United States Citizen Son and Community Ties**

Petitioner is the father of Tony Williams Sanchez, a United States citizen born on [REDACTED] 2005, in Augusta, Richmond County, Georgia (Georgia State File No. [REDACTED]). Tony Williams Sanchez holds a valid United States passport (No. [REDACTED]). Petitioner's detention causes severe and direct hardship to his U.S. citizen son.

Petitioner has lived in the Augusta, Georgia area for many years. Since at least October 2018, he has been a registered and active parishioner in good standing at Our Lady of Peace Catholic Church, 139 Way of Peace, North Augusta, South Carolina 29841, as confirmed in a letter dated October 14, 2025, signed by the Church's Administrator, Rev. John Antonydas Gaspar. These longstanding community ties establish that Petitioner is neither a flight risk nor a danger to the community.

### **D. Pending Immigration Proceedings**

Petitioner is not subject to any final order of removal. He is in active removal proceedings before the Atlanta Immigration Court. His next hearing is a Master Calendar Hearing on April 23, 2026, at 1:00 p.m., before Immigration Judge Bianca H. Brown, conducted via WebEx (<https://eoir.webex.com/meet/IJ.BiancaBrown>). His confinement at a geographically remote facility, without legal counsel, without family support, and without access to documentation,

directly and irreparably impairs his ability to prepare and participate meaningfully in those proceedings.

#### **IV. CLAIMS FOR RELIEF**

##### **CLAIM ONE — Unlawful Warrantless Civil Immigration Arrest (Fourth and Fifth Amendments)**

ICE's authority to arrest without a warrant under 8 U.S.C. § 1357(a)(2) requires, at minimum, a reasonable belief that the alien is present unlawfully and is likely to escape before a warrant can be obtained. No such showing was made. Petitioner was confined inside a county jail, had posted bond, and posed no flight risk. The warrantless civil immigration arrest was constitutionally defective. See *Morales v. Chadbourne*, 793 F.3d 208 (1st Cir. 2015); *Lopez v. Heckler*, 713 F.2d 1432 (9th Cir. 1983). Furthermore, using a pretextual state traffic stop as the mechanism to effectuate an immigration arrest, and then seizing the individual before a paid bond could be executed, raises serious Fourth Amendment concerns about the integrity of state court processes.

##### **CLAIM TWO — Prolonged Civil Detention Without Individualized Bond Hearing (Fifth Amendment Due Process)**

The Fifth Amendment's Due Process Clause applies to all persons within the United States, including non-citizens in removal proceedings. *Mathews v. Eldridge*, 424 U.S. 319 (1976). While *Demore v. Kim*, 538 U.S. 510 (2003), recognized that brief mandatory detention during removal proceedings may be permissible, the Court expressly held that prolonged detention raises distinct constitutional concerns. *Id.* at 531. Where the duration of detention becomes unreasonable, due process requires a bond hearing at which the government bears the burden to demonstrate by clear and convincing evidence that detention is justified by danger or flight risk. See *Sopo v. U.S. Att'y Gen.*, 825 F.3d 1199 (11th Cir. 2016); *Leslie v. Att'y Gen.*, 678 F.3d 265 (3d Cir. 2012).

Petitioner has been detained since April 5, 2026—continuously, and without any individualized hearing. He has a U.S. citizen son. He has been a churchgoing community member since at least 2018. He paid state bond the same day he was arrested. None of these factors has

ever been weighed by an immigration judge at a hearing where the government bore the burden of proof. His continued detention without such a hearing is unconstitutional.

**CLAIM THREE — Impairment of Right to Meaningful Participation in Immigration Proceedings**

Due process entitles Petitioner to a meaningful opportunity to present his case in immigration court. *Reno v. Flores*, 507 U.S. 292 (1993). His detention at Stewart Detention Center—remote, understaffed, and far from counsel, family, and his documentary evidence—effectively denies him that opportunity. With a Master Calendar Hearing on April 23, 2026, the harm is imminent and concrete. Conditions of supervised release would adequately protect the government's interests.

**CLAIM FOUR — No Compelling Government Interest Supports Continued Detention**

Under *Zadvydas v. Davis*, 533 U.S. 678 (2001), immigration detention must serve the statutory purposes of preventing flight and protecting the community. Where, as here, a petitioner has strong family ties, a stable community identity, and no history of violence or serious crime, the government cannot demonstrate by clear and convincing evidence that continued detention is necessary. Release on conditions of supervision—such as check-ins, electronic monitoring, or bond—would adequately serve the government's legitimate interests.

**V. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

No administrative exhaustion is required for a constitutional challenge to the lawfulness of detention itself under § 2241. See *Iddir v. I.N.S.*, 301 F.3d 492, 498 (7th Cir. 2002). Exhaustion would also be futile given the imminence of the April 23, 2026 immigration hearing and the ongoing constitutional deprivation.

**VI. PRAYER FOR RELIEF**

WHEREFORE, Petitioner respectfully requests that this Court:

1. Issue a Writ of Habeas Corpus directing Petitioner's immediate release from immigration detention, with or without reasonable conditions of supervision;
2. In the alternative, order Respondents to provide Petitioner with an individualized bond hearing before an immigration judge within 48 hours, at which the government bears the burden of demonstrating by clear and convincing evidence that continued detention is justified;
3. Issue a Temporary Restraining Order and Preliminary Injunction prohibiting Petitioner's removal from the United States pending resolution of this Petition;
4. Declare that the warrantless civil immigration arrest of April 5, 2026, was unlawful;
5. Award costs and any other relief this Court deems just and proper.

Respectfully submitted this April 14, 2026,



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William Sanchez Reyes, Pro Se

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Stewart Detention Center

146 CCA Road

Lumpkin, GA 31815

**CERTIFICATE OF SERVICE**

I, William Sanchez Reyes, hereby certify that on April 14, 2026, I caused a true and correct copy of the Petition for Writ of Habeas Corpus to be served upon the following parties by depositing the same in the United States mail, first-class postage prepaid, addressed as follows:

1. Jason Streeval, Warden, Stewart Detention Center, 146 CCA Road, Lumpkin, GA 31815
2. Markwayne Mullin, Secretary of Homeland Security, 2707 Martin Luther King Jr. Ave., SE, Washington, DC 20528
3. Todd Blanche, Acting Attorney General, 950 Pennsylvania Avenue, NW, Washington, DC 20530-0001
4. Civil Process Clerk, U.S. Attorney's Office, Middle District of Georgia, 300 Mulberry Street, Suite 400, Macon, GA 31201

Executed on April 14, 2026 at Lumpkin, Georgia.



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William Sanchez Reyes, Pro Se

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Stewart Detention Center

146 CCA Road

Lumpkin, GA 31815