AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

FILED
APR 22 2026
US DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES DISTRICT COURT

for the

Ugalde, Garcia, Manuel
Petitioner

v.

Case No. _____
(Supplied by Clerk of Court)

Pamela Bondi and John Mattos
Respondent
(name of warden or authorized person having custody of petitioner)

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

Personal Information

1. (a) Your full name: Ugalde, Garcia, Manuel
   (b) Other names you have used:
2. Place of confinement:
   (a) Name of institution: Nevada Southern Detention Center
   (b) Address: 2190 E. Mesquite Ave. Pahrump, Nevada, 89060
   (c) Your identification number: [redacted]
3. Are you currently being held on orders by:
   ☐ Federal authorities ☐ State authorities ☒ Other - explain:
   Immigration Custom Enforcement (ICE)
4. Are you currently:
   ☐ A pretrial detainee (waiting for trial on criminal charges)
   ☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
   If you are currently serving a sentence, provide:
   (a) Name and location of court that sentenced you:
   (b) Docket number of criminal case:
   (c) Date of sentencing:
   ☒ Being held on an immigration charge
   ☐ Other *(explain)*:

Decision or Action You Are Challenging

5. What are you challenging in this petition:
   ☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
☐ Disciplinary proceedings
☐ Other *(explain)*:

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: Las Vegas Immigration Court 110 N. City Parkway . Suite 400 . Las Vegas, Nevada, 89106

(b) Docket number, case number, or opinion number: [redacted]

(c) Decision or action you are challenging *(for disciplinary proceedings, specify the penalties imposed)*: Denied Bond and Asylum.

(d) Date of the decision or action: March, 27, 2026

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☐ Yes ☐ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court:

(2) Date of filing:

(3) Docket number, case number, or opinion number:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not appeal:

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☐ Yes ☐ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court:

(2) Date of filing:

(3) Docket number, case number, or opinion number:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not file a second appeal:

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☐ Yes ☐ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court:

(2) Date of filing:

(3) Docket number, case number, or opinion number:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) If you answered "No," explain why you did not file a third appeal:

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes ☐ No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☐ Yes ☐ No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes ☐ No

If "Yes," provide:

(1) Name of court:

(2) Case number:

(3) Date of filing:

(4) Result:

(5) Date of result:

(6) Issues raised:

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence:

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☒ Yes ☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: January, 7, 2026

(b) Date of the removal or reinstatement order:

(c) Did you file an appeal with the Board of Immigration Appeals?

☒ Yes ☐ No

If "Yes," provide:

(1) Date of filing: 4·19·2026

(2) Case number: [redacted]

(3) Result: Pending

(4) Date of result:

(5) Issues raised:

(d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes ☐ No

If "Yes," provide:

(1) Name of court:

(2) Date of filing:

(3) Case number:

(4) Result:

(5) Date of result:

(6) Issues raised:

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☐ Yes ☐ No

If "Yes," provide:

(a) Kind of petition, motion, or application:

(b) Name of the authority, agency, or court:

(c) Date of filing:

(d) Docket number, case number, or opinion number:

(e) Result:

(f) Date of result:

(g) Issues raised:

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: I, the petitioners prolonged detention without the opportunity for release on bond violates my right to due process under the Fifth Ammendment of the United States Constitution.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

Fifth Ammendment states [NO] Person shall be... deprived of life, liberty, or property without due process of laws.

(b) Did you present Ground One in all appeals that were available to you?

☐ Yes ☒ No

GROUND TWO:

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

(b) Did you present Ground Two in all appeals that were available to you?

☐ Yes ☐ No

GROUND THREE:

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

(b) Did you present Ground Three in all appeals that were available to you?

☐ Yes ☐ No

GROUND FOUR:

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

(b) Did you present Ground Four in all appeals that were available to you?

☐ Yes ☐ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

Request for Relief

15. State exactly what you want the court to do: I want the court to ISSUE a WRIT habeas Corpus to have me brought before the court so that I maybe discharged from my Un-Constitutional Confinment within 30 days Unless I am granted Reasonable bond.

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

4·19·2026

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 4·19·2026

Signature of Petitioner

Signature of Attorney or other authorized person, if any

DETAINED : UGALDE GARCIA MANUEL

[redacted]

NEVADA SOUTHERN DETENTION CENTER
2190 E MESQUITE AVE
PAHRUMP, NV89060

COURT REQUEST

My full name is UGALDE GARCIA MANUEL, I am a native and citizen of CUBA. I am currently being held at the NEVADA SOUTHERN DETENTION CENTER.

I am sending this letter to the immigration court and the department of homeland security to respectfully request a bond hearing please

I entered the United States of March 16, 2022, and submitted my asylum application in October 2022, seven months after arriving in this country. I have been living here for four years and was arrested on January 7, 2026, after an argument with my girlfriend. My case was dismissed because it was all a misunderstanding. I was then transferred by ICE to the detention center where I am currently being held. I believe I am eligible for bail and am not subject to mandatory detention. I am not a danger to society or a flight risk. I am a responsible and hardworking man. I have my baby [redacted] 1 year old, who is American citizen, he depend on me. I have my work permit and my social security number is [redacted] I respectfully request that Your Honor consider my case and grant me the opportunity to be released on bail

IMMIGRATION COURT
110 N CITY PARWAY STE 400
LAS VEGAS, NV89106

DEPARTMENT OF HOMELAND SECURITY DHS/ICE
501 SOUTH LAS VEGAS BLVD SUITE 200
LAS VEGAS, NV89101

Manuel Mariano Ugalde

[redacted]

United States

Date: _____

Honorable Immigration Judge:

My name is Manuel Mariano Ugalde, and through this letter I wish to express my commitment and responsibility toward my grandson, Manuel Ugalde García.

I reside at the address listed above and I am willing to provide my grandson with a safe place to live in my home. I commit to offering him support, supervision, and care while he attends and complies with all the processes and hearings required by the United States Immigration Court.

Likewise, I commit to ensuring that Manuel Ugalde García attends all scheduled court hearings and complies with any other obligations required by immigration authorities. I also commit to supporting him emotionally and financially as needed while his legal process is ongoing.

I understand the seriousness of this responsibility and I am willing to fully cooperate with authorities to ensure that my grandson complies with all conditions established by the court.

Thank you for your time and consideration.

Sincerely,

Manuel Mariano Ugalde

Phone [redacted]

Total Tire and Service of Central Florida
5292 S Orange Blossom Trail
Orlando, Florida 32839
Phone: 407-243-7478

March 08, 2026

To the Honorable Immigration Judge,

Re: Support Letter for Manuel Ugalde Garcia

Your Honor,

This letter is to confirm that Manuel Ugalde Garcia is employed at Total Tire and Service of Central Florida. During his time working with us, Manuel has proven himself to be a dependable and hardworking employee. He consistently shows respect toward management and coworkers and performs his duties with dedication.

Manuel is a valued member of our team, and we believe he deserves the opportunity to continue working. Our company is willing to support him so that he may return to work and remain focused on staying out of trouble. Continued employment will help him maintain stability and continue being a productive member of the community.

We respectfully ask the Court to take this letter into consideration. Thank you for your time and attention.

Mousa Rhaima
Owner
Total Tire and Service of Central Florida
Phone: 407-243-7478

Andres Ugalde Solano

[redacted]

Date: _____

To Whom It May Concern:

My name is Andres Ugalde Solano and I am writing this letter in support of Manuel Ugalde García. I am his uncle and I have known him for many years. Throughout this time I have always known him to be a respectful, responsible person with good moral character.

I am willing to support Manuel Ugalde García during the time of his immigration process in the United States. I will ensure that he attends all required court hearings and any appointments or check■ins with USCIS or other immigration authorities.

Additionally, I am willing to provide him with housing, food, and support for medical insurance while his legal adjustment process is pending. I also take responsibility for helping ensure that he maintains good conduct and complies with all legal requirements during this time.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Sincerely,

Andres Ugalde Solano

Phone [redacted]

[redacted]

AVISO DE DEMANDA COLECTIVA

Es posible que usted sea miembro de una demanda colectiva que ha sido certificada por el Tribunal de Distrito de los Estados Unidos para el Distrito Central de California en *Lazaro Maldonado Bautista et al. contra Ernesto Santacruz Jr et al.*, N.° 5:25-cv-01873-SSS-BFM (C.D. Cal. 2025). El 18 de diciembre de 2025, el Tribunal de Distrito dictó una sentencia según la cual determinados inmigrantes detenidos podrían estar recluidos ilegalmente y solicitar la libertad bajo fianza o libertad condicional en virtud del artículo 8 U.S.C. § 1226(a). Por lo tanto, usted puede tener derecho a solicitar la libertad bajo fianza o libertad condicional por parte de funcionarios de inmigración; también puede tener derecho a una audiencia de fianza si lo solicita al Tribunal de Inmigración. En la audiencia de fianza, el Juez de Inmigración puede determinar que usted es elegible para ser liberado bajo fianza mientras sus procedimientos de expulsión están pendientes.

Si tiene alguna pregunta sobre su posible pertenencia a la demanda colectiva o sobre sus derechos en virtud de la sentencia del Tribunal de Distrito, puede llamar a los abogados que representan a la demanda colectiva al (415) 343-0770.

Fecha de entrega: _____

Entregó en el lugar: NSDC

Nombre de la persona a quien se le hizo entrega: Manuel Ugalde-Garcia

Número de extranjeros a quienes se les hizo entrega: [redacted]

Nombre del funcionario que entregó la notificación: _____

Número de identificación del agente que entregó la notificación: _____

Firmado por el oficial en que entregó: _____

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

Instructions

1. **Who Should Use This Form.** You should use this form if
   - you are a federal prisoner and you wish to challenge the way your sentence is being carried out *(for example, you claim that the Bureau of Prisons miscalculated your sentence or failed to properly award good time credits)*;
   - you are in federal or state custody because of something other than a judgment of conviction *(for example, you are in pretrial detention or are awaiting extradition)*; or
   - you are alleging that you are illegally detained in immigration custody.

2. **Who Should Not Use This Form.** You should not use this form if
   - you are challenging the validity of a federal judgment of conviction and sentence *(these challenges are generally raised in a motion under 28 U.S.C. § 2255)*;
   - you are challenging the validity of a state judgment of conviction and sentence *(these challenges are generally raised in a petition under 28 U.S.C. § 2254)*; or
   - you are challenging a final order of removal in an immigration case *(these challenges are generally raised in a petition for review directly with a United States Court of Appeals)*.

3. **Preparing the Petition.** The petition must be typed or neatly written, and you must sign and date it under penalty of perjury. **A false statement may lead to prosecution.**

4. **Answer all the questions.** You do not need to cite law. You may submit additional pages if necessary. If you do not fill out the form properly, you will be asked to submit additional or correct information. If you want to submit any legal arguments, you must submit them in a separate memorandum. Be aware that any such memorandum may be subject to page limits set forth in the local rules of the court where you file this petition. If you attach additional pages, number the pages and identify which section of the petition is being continued. All filings must be submitted on paper sized 8½ by 11 inches. **Do not use the back of any page.**

5. **Supporting Documents.** In addition to your petition, you must send to the court a copy of the decisions you are challenging and a copy of any briefs or administrative remedy forms filed in your case.

6. **Required Filing Fee.** You must include the $5 filing fee required by 28 U.S.C. § 1914(a). If you are unable to pay the filing fee, you must ask the court for permission to proceed in forma pauperis – that is, as a person who cannot pay the filing fee – by submitting the documents that the court requires.

7. **Submitting Documents to the Court.** Mail your petition and ____ copies to the clerk of the United States District Court for the district and division in which you are confined. For a list of districts and divisions, see 28 U.S.C. §§ 81-131. All copies must be identical to the original. Copies may be legibly handwritten.

   If you want a file-stamped copy of the petition, you must enclose an additional copy of the petition and ask the court to file-stamp it and return it to you.

8. **Change of Address.** You must immediately notify the court in writing of any change of address. If you do not, the court may dismiss your case.