



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

Angelo Alexadro Codallo-Camero

Petitioner,

V.

'26CV2559 JES AHG

**INJUNCTIVE RELIEF
TEMPORARY RESTRAINING ORDER**

Pamela Bondi, U.S. Attorney General,
Markwayne Mullin, Secretary of DHS,
Todd Lyons, Director of ICE,
Christopher LaRose, Warden of Otay Mesa Detention Center

Respondent's

**MOTION FOR TEMPORARY RESTRAINING ORDER,
AND
INJUNCTIVE RELIEF**

TEMPORARY RESTRAINING ORDER

Petitioner-Plaintiff, Angelo Alexadro Codallo-Camero moves this court *ex parte* for a Temporary Restraining Order that would, among other things, require his immediate release from his ongoing detention by agents of Immigration and Customs Enforcement (ICE) and prohibit his re-arrest without pre-detention hearing before an "IJ" Immigration judge at which ICE establishes by clear and convincing evidence that his detention is necessary to prevent his Flight Risk or Protect the Public.

Background:

The evidence before this Court establishes that Angelo Alexadro Codallo-Camero is a 21-year old from Venezuela. Petitioner was brought to the United States by his parents for a better future and education. Petr is also fleeing persecution from the Venezuelan Government and Regime. Petr now is a 21 years of age and has applied for protection under Asylum. While in the United States Petr went to school and studied upto the 12th grade. Petr had an encounter with Law Enforcement on tear 2024 for an assault charge and was sentenced to 24 months probation. Here Petr had been granted Authorization Work Permitt and a Social Security Card behind his Asylum application from 2015. Petr counts with "TPS" Temporary Protected Status until September 2026. on March,6,2025 Petitioner's probation officer summoned Petitioner to the office to only turn him over to ICE custody. Petitioner never violated his conditions of probation and always remained compliant. Here ICE is unequivocally violating Petitioner's Due Process Right by arresting him for no reason, meaning Petitioner had not comitted any crime or violated his probation conditions. Petitioner has remained under ICE custody and had to re-sumitt another Asylum application which has been denied by Immigration Judge Amelia Anderson. Petitioner is

seeking review under the "BIA" Board of Immigration Appeals but refers to this court for an immediate release under the Habeas Corpus Prolonged Detention. Here this court has Jurisdiction to hear this case and decide on it. Petitioner suffers of "HDD" since childhood and also of "PTSD" from the trauma lived in his country. Petitioner request that this Court grant the Temporary Restraining Order so Respondent's cannot transfer Petitioner out of the Jurisdiction of the Court or from the Otay Mesa Detention Center until the Habeas Corpus is adjudicated. My health has worsen because I have developed Depression, Anxiety, and Major Stress Disorder because of the prolonged period of detention I have spent in custody and not being able to be by the side of my immediate family. I have not received any incident reports for misbehavior since I have been detained here at Otay Mesa Detention Center and have remained in good behavior while in ICE custody. I am requesting for this Temporary Restraining Order to be put in place so ICE won't be able to transfer me or deport me before this Habeas Corpus is adjudicated. I have kept a job in this detention center and have attended courses to better myself in life and I continue to work on myself.

CITING CASES LAW: *Jose Antonio Ambrocio Garcia Case No. 25-cv-03319-BAS-DEB (2025). Carmen Araceli Pablo sEQUEN Case No. 25-cv-06487-PCP, and F.T.C v. Dean Foods and many other cases that are being gathered.*

Date: 4-13-2026

Angelo Alexadro Codallo-Camero


Otay Mesa Detention Center
P.O. Box 439049
San Diego, CA 92143

Sincerely

