

FILED - 2026 MAY 13
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**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

KEVIN JOSÉ FERNÁNDEZ FLORES,
Petitioner,

v.

U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE), et al.,
Respondents.

Case No.: 3:26-cv-01095-WWB-SJH

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

I. INTRODUCTION

Petitioner, Kevin José Fernández Flores, respectfully seeks a Writ of Habeas Corpus under 28 U.S.C. § 2241, challenging his unlawful and prolonged detention by U.S. Immigration and Customs Enforcement (ICE), in violation of the Due Process Clause of the Fifth Amendment.

II. JURISDICTION AND VENUE

This Court has jurisdiction pursuant to 28 U.S.C. § 2241. Venue is proper in this District as Petitioner is detained at:

North Florida Detention Facility
20706 U.S. Highway 90 West
Sanderson, Florida 32087

III. PARTIES

Petitioner:

Kevin José Fernández Flores

A#: 

Citizen of Venezuela

Respondents:

U.S. Immigration and Customs Enforcement (ICE)
Facility Director, North Florida Detention Facility
Secretary of Homeland Security

IV. STATEMENT OF FACTS

1. Petitioner is a citizen of Venezuela residing in the United States since approximately 2022.
2. Petitioner has established ties to the community and has a stable residence.
3. Petitioner was detained on March 4, 2026, in Fort Pierce, Florida.
4. Petitioner was transferred to Osceola County and later to North Florida Detention Facility.

5. Prior residence:



6. Petitioner has a partner, Bárbara Ciravolo, who will receive him upon release.

7. Petitioner has a valid Employment Authorization Document (EAD).

8. Petitioner has maintained good moral character.

V. CAUSE OF ACTION

A. Prolonged detention violates due process.

B. Petitioner is not a flight risk or danger.

C. Transfers have impacted ability to defend case.

D. Less restrictive alternatives exist.

VI. RELIEF REQUESTED

Petitioner respectfully requests:

1. Immediate release;
2. Alternatively, a bond hearing;
3. Any other relief deemed appropriate.

VII. CONCLUSION

Petitioner's continued detention is unconstitutional.

Respectfully submitted,



Kevin José Fernández Flores
A#: 

Date: 04/21/26

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

DECLARATION OF KEVIN JOSÉ FERNÁNDEZ FLORES

I, Kevin José Fernández Flores, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge:

1. My name is Kevin José Fernández Flores. I was born on December 23, 2003, in Venezuela.
2. I came to the United States in search of a better and safer future. Since my arrival, I have made every effort to build a stable life and move forward in a positive way.
3. During my time in this country, I have worked hard and tried to do things the right way. I have stayed focused on improving my life and being a respectful member of the community.
4. Before being detained, I was living in Kissimmee, Florida, where I shared a home with my partner. That place is still available to me, and I have a safe and stable environment to return to if I am released.
5. My relationship with my partner is very important to me. She has been my emotional support, and being separated from her has been extremely difficult. This situation has affected me deeply.
6. Since my detention on March 4, 2026, I have felt a lot of uncertainty, stress, and fear. Being in detention has made it very hard for me to stay calm and focused on my case.
7. I want to make it clear that I am willing to follow all the rules and requirements if I am released. I will attend all court dates and comply with any conditions that are given to me.
8. I am not trying to avoid the legal process. I only want the opportunity to continue my case while being outside of detention, where I can think clearly, communicate better, and have the support of my loved ones.

9. I respectfully ask for the chance to be released so I can continue working on my future and face my immigration process in a fair and dignified way.

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

Executed on this 21 day of April, 2026.

Kevin José Fernández Flores
Kevin José Fernández Flores
A#: 