

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

United States Courts
Southern District of Texas
FILED

JUN 18 2025

Nathan Ochsner, Clerk of Court

IN THE MATTER OF THE DETENTION OF:

RANDI RAFAEL CHÁVEZ RUIZ,

Petitioner, by Next Friend Danelis Milagros Ruiz Gonzalez

Civil Action No. _____

PETITION FOR WRIT OF HABEAS CORPUS

PURSUANT TO 28 U.S.C. § 2241

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES Danelis Milagros Ruiz Gonzalez, a United States citizen and the mother of Randi Rafael Chávez Ruiz,

detained by Immigration and Customs Enforcement (ICE), and files this Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241, on behalf of her son, as his "Next Friend." This petition is brought to challenge the unlawful and unconstitutional detention of Randi Rafael Chávez Ruiz, a 22-year-old Cuban national, currently held

under federal immigration custody.

Randi suffers from epilepsy and a serious mental condition. He has been a victim of human trafficking and was coerced

by a cartel member to cross individuals through the border against his will. While under this coercion, he was forced

to plead guilty in Val Verde County under Judge Alia Moses, without full awareness of his rights and without proper

legal counsel.

On June 13, 2025, a Form I-246 (Stay of Removal) was submitted by his mother in an attempt to halt imminent deportation,

but no proper investigation of his victim status has been initiated. The U Visa process has not yet been filed due to

fear, lack of legal assistance, and repeated denials of support from various federal and local agencies. His mother has

sought help from ICE, the Mexican Consulate, Congressional offices, and the FBI, with no action taken to date.

Ms. Ruiz Gonzalez is now requesting this Honorable Court to intervene and order the immediate review of her son's

detention and protections available to him as a victim of human trafficking and mental disability. Randi's deportation

to Cuba would not only be dangerous and inhumane due to his medical and psychological condition, but also a violation

of due process and human rights protections.

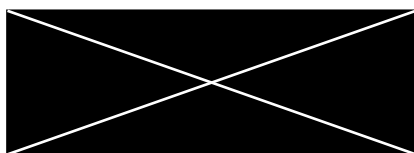
WHEREFORE, Petitioner respectfully requests that this Court issue a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241,

and grant such further relief as the Court deems just and proper, including a temporary stay of removal while this matter is under judicial consideration.

Respectfully submitted,



Danelis Milagros Ruiz Gonzalez



DOB:



U.S. Citizen

Date: June 17, 2025

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