

September 11, 2025

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

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CLERK U S DISTRICT COURT	
DISTRICT OF ARIZONA	
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RAIGOZA RIVERA, DANIELA

A – Number: 

Petitioner,

CV25-03444-PHX-SHD--MTM

v.

MERRICK GARLAND, Attorney General of the United States;

ALEJANDRO MAYORKAS, Secretary of the Department of Homeland Security;

TAE JOHNSON, Acting Director of U.S. Immigration and Customs Enforcement;

COREY PRICE, Field Office Director, Phoenix Field Office, ICE;

and WARDEN OF ELOY DETENTION CENTER,

Respondents.

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

I. PARTIES

1. Petitioner, Daniela Raigoza Rivera A -  is a citizen of Colombia, currently detained at Eloy Detention Center, Eloy, Arizona.
2. Respondents are U.S. officials responsible for her detention.

THIS DOCUMENT IS NOT IN PROPER FORM ACCORDING
TO FEDERAL AND/OR LOCAL RULES AND PRACTICES
AND IS SUBJECT TO REJECTION BY THE COURT.

REFERENCE LRCivP 54
(Rule Number/Section)

II. JURISDICTION AND VENUE

3. This Court has jurisdiction under 28 U.S.C. § 2241 to review the legality of Petitioner's detention.
4. Venue is proper in the District of Arizona because Petitioner is detained in Eloy, Arizona.

III. FACTUAL BACKGROUND

5. On July 3, 2025, Immigration Judge NICOLAS ORECHWA granted Petitioner withholding of removal, on behalf of the government AMANDA EHRET, Deputy Senior Advisor for U.S. Immigration and Customs Enforcement.
6. Despite this judicial grant, Petitioner remains detained at Eloy Detention Center.
7. ICE has refused to release her under an Order of Supervision and has failed to provide any lawful justification for her continued detention.

IV. LEGAL CLAIMS

8. Under *Zadvydas v. Davis*, 533 U.S. 678 (2001), indefinite detention without a significant likelihood of removal in the reasonably foreseeable future is unconstitutional.
9. Because Petitioner has been granted withholding of removal, she cannot be removed to her country of origin.
10. Continued detention therefore violates the Fifth Amendment's Due Process Clause and exceeds the statutory authority of ICE.

V. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

- a. Issue a writ of habeas corpus ordering Respondents to release Petitioner immediately under reasonable conditions of supervision;
- b. Declare Petitioner's continued detention unlawful; and
- c. Grant such other and further relief as this Court deems just and proper.

Respectfully submitted,

Daniela Raigosa Rivera (N.F.)

Daniela Raigosa Rivera

Petitioner, Pro Se

Eloy Detention Center

Eloy, Arizona