

United States Courts
Southern District of Texas
FILED

NOV - 5 2025

Nathan Ochener, Clerk of Court

UNITED STATES DISTRICT COURT

for the
Southern District of Texas
Houston Division

**ROBERT CARLOS
CAMAJUANI DESPAIGNE**

Petitioner

v.

WARDEN RAYMOND THOMPSON,
Joe Corley Processing Center, Conroe, TX,

and

BRET A. BRADFORD, Director,
Houston Field Office, U.S. Immigration and
Customs Enforcement,

Respondents.

Case No. _____

HABEAS CORPUS PETITION – PRO SE SUBMISSION

I. INTRODUCTION

I, Robert Carlos Camajuani Despaigne, respectfully submit this Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241. I have remained in immigration custody for several months without a judicial order, without an active removal proceeding, and without any legitimate purpose. My detention has lost all justification and now constitutes a violation of my constitutional right to due process.

II. RELEVANT FACTS

1. I was initially released under Form I-220A. I complied with all its conditions and appeared punctually before authorities.
2. On June 12, 2025, my case was dismissed under INA§239.2(a), restoring jurisdiction to USCIS. That same day ICE detained me without a removal order.

My partner, diagnosed with skin cancer, requested my humanitarian release; ICE never responded.

3. I filed Form I-485 for adjustment of status under the Cuban Adjustment Act. USCIS accepted the filing, issued the I-797C receipt, and confirmed jurisdiction.

4. USCIS scheduled a biometrics appointment, but due to ICE's lack of coordination, no transportation was arranged, forcing me to reschedule. The new appointment was set for August 12, 2025, and because ICE again failed to coordinate, I had to reschedule a second time for September 3, 2025. Despite this, ICE never coordinated my transport, and my fingerprints have still not been taken. Weeks later, I personally delivered the original USCIS appointment notice to an officer for coordination, yet no action was taken. This omission has prevented progress on my adjustment case and prolonged a detention without legal purpose or administrative justification.

5. The Immigration Judge denied bond for lack of jurisdiction on July 24, 2025, leaving my custody solely under ICE.

6. I filed an appeal before the Board of Immigration Appeals challenging the denial of administrative closure. The appeal remains pending and does not constitute a legal basis for detention.

7. My partner and I have submitted four humanitarian parole requests to ICE, supported by medical and family evidence. A service request was also filed to follow up, and the only response received was "OK," without further action or written reply. This inaction reflects a systematic administrative omission and a failure to exercise humanitarian discretion under INA § 212(d)(5).

8. I have had no contact with the officer handling my case; the facility refuses to provide that information.

9. In October 2025, USCIS confirmed in writing (Service Request ID XXXXXXXXXX) that it had resumed jurisdiction. ICE continues to detain me without justification

III. PERSONAL BACKGROUND

I am a Cuban national with technical training in construction and electrical work. I hold a helper electrician license and worked as a solar-panel installer. I have no criminal record, have always cooperated with authorities, and maintained steady employment—facts demonstrating good moral character, community ties, and absence of danger to the public.

IV. LEGAL GROUNDS

1. Lack of Legal Authority: There is no removal order or active proceeding; therefore ICE lacks independent authority to detain me.
2. Arbitrary Detention: My custody serves none of the legally recognized purposes (final order, danger, or ongoing proceeding).
3. Administrative Inconsistency: ICE maintains custody that obstructs USCIS's adjudication process.

4. Humanitarian Harm: My partner's illness and my young daughter's dependence cause severe hardship due to my detention.
5. Constitutional Limits: The Supreme Court has held that civil detention cannot be indefinite or purposeless (*Zadvydas v. Davis*, *Clark v. Martinez*).

V. PRAYER FOR RELIEF

Petitioner respectfully requests that this Honorable Court:

- (1) Order my immediate release under supervision or humanitarian parole while USCIS processes my pending I-485 application;
- (2) Declare that my continued detention lacks legal basis and violates due process;
- (3) Grant any other relief this Court deems fair and just; and
- (4) If this Honorable Court deems it appropriate, Petitioner respectfully requests that this Petition be considered on an **expedited basis**, given the humanitarian nature of the case and the irreparable harm caused by continued detention.

VI. FINAL DECLARATION

I declare under penalty of perjury that the foregoing is true and correct. Executed this 3rd day of November 2025, at Joe Corley Processing Center, Conroe, Texas.

Respectfully submitted,

Robert Carlos Camajuani Despaigne



Joe Corley Processing Center

Conroe, Texas

CERTIFICATE OF SERVICE

I, Robert Carlos Camajuani Despaigne, hereby certify that on this 3rd day of November 2025, I sent a true and correct copy of the foregoing Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241, together with all supporting documents, to the following recipients:

Office of the United States Attorney
Southern District of Texas
Attn: Civil Process Clerk
1000 Louisiana Street, Suite 2300
Houston, TX 77002

Office of the Chief Counsel
U.S. Immigration and Customs Enforcement
126 Northpoint Drive
Houston, TX 77060

Executed on this 3rd day of November 2025, at Joe Corley Processing Center, Conroe, Texas.



Robert Carlos Camajuani Despaigne

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Petitioner, Pro Se