

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS – HOUSTON DIVISION

United States Courts  
Southern District of Texas  
FILED

NOV 06 2025

**KELLYS YOSSANY REVERON CORNEJO**, Petitioner,

v.

DEPARTMENT OF HOMELAND SECURITY (DHS);  
IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE);  
DIRECTOR OF ICE HOUSTON FIELD OFFICE;  
WARDEN/DIRECTOR OF HOUSTON CONTRACT DETENTION FACILITY (H-CDF),  
Respondents.

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

Date: November 4, 2025

**I. INTRODUCTION**

I, Kellys Yossany Reveron Cornejo, respectfully submit this Petition for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and the Fifth Amendment to the United States Constitution, requesting my immediate release, or in the alternative, less restrictive supervision that safeguards my rights to life, health, and due process.

My civil immigration detention has become punitive and unconstitutional due to: (a) my serious medical conditions—endometrial cancer and type 2 diabetes—without adequate medical care; (b) my arrest inside the courthouse immediately after attending my immigration hearing; and (c) the absence of flight risk or danger to the community.

I appear pro se and respectfully request the appointment of pro bono counsel due to the medical and legal complexity of my case.

**II. JURISDICTION AND VENUE**

This Court has jurisdiction under 28 U.S.C. § 2241 because I am held in federal custody within this District.

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Venue is proper before the Southern District of Texas, Houston Division, as I am detained at Houston Contract Detention Facility (H-CDF).

Expedited review is warranted due to the imminent risk of irreparable harm to my health and life.

### **III. RESPONDENTS**

Department of Homeland Security (DHS) – agency with authority over immigration custody.

Immigration and Customs Enforcement (ICE) – agency executing my detention.

Director of ICE Houston Field Office – responsible for custody decisions.

Warden/Director of H-CDF – responsible for my physical custody and access to medical care.

### **IV. FACTUAL BACKGROUND**

I have complied with all immigration requirements throughout my case.

I filed my Form I-589 (asylum application) within the required one-year deadline.

On August 4, 2025, I voluntarily attended my immigration hearing at the Federal Plaza Immigration Court in New York.

After the hearing, while still inside the courthouse hallway, I was detained by ICE officers.

This courthouse arrest violated my due process rights, discouraged access to the court system, and constituted punitive action in a civil context.

I have no criminal history, pose no danger to the community, and have demonstrated full compliance with all court appearances.

I suffer from endometrial cancer and type 2 diabetes, both of which require continuous medical care and monitoring.

On August 28, 2025, I had a CT Scan scheduled to evaluate cancer progression; ICE failed to transport me to this critical medical appointment, interrupting my diagnosis and treatment.

This failure reflects deliberate indifference to my serious medical needs, placing my life at risk.

I have repeatedly requested adequate medical care and humanitarian release.

I have submitted formal complaints regarding the lack of medical care and the risk to my life.

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## **V. EXHAUSTION OF ADMINISTRATIVE REMEDIES**

I attempted to exhaust all reasonable administrative remedies available to me, including internal medical requests at the facility, humanitarian parole requests to ICE, and complaints to oversight authorities.

No effective response or access to appropriate medical care has been provided.

Due to the medical urgency of my condition, further administrative delay would be futile and dangerous, justifying immediate judicial intervention.

## **VI. LEGAL BASIS**

The Fifth Amendment guarantees due process; denying or delaying essential medical care in civil detention violates this constitutional protection.

Deliberate indifference to serious medical needs is prohibited under constitutional standards applied to persons in custody (*Estelle v. Gamble*; *Farmer v. Brennan*).

Courthouse arrests immediately following compliance with court proceedings violate principles of fundamental fairness.

Under 8 C.F.R. § 212.5(b), DHS may grant humanitarian parole for urgent reasons; my circumstances meet this criterion.

Humanitarian and dignity-based principles recognized internationally should guide this Court's consideration of my right to life, health, and humane treatment.

## **VII. IRREPARABLE HARM**

My medical conditions require immediate and ongoing care; any delay increases the risk of irreversible harm.

Failure to transport me to essential medical appointments effectively constitutes denial of care.

Immediate release or treatment outside detention is necessary to prevent irreparable harm.

## **VIII. REQUEST FOR PRO BONO COUNSEL**

I respectfully request the appointment of pro bono counsel due to my medical condition, detention limitations, and the legal complexity of this Petition.

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**IX. REQUEST FOR RELIEF**

Order my immediate release under appropriate conditions.

Alternatively, order ICE to ensure prompt access to all cancer-related diagnostic tests, including CT Scan, and specialized treatment outside detention.

Grant any other relief this Court deems just and proper to protect my life, health, and rights.

**X. SIGNATURE**

Signed: Kellys Reveron

Name: Kellys Yossany Reveron Cornejo

Date: November 4, 2025

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## PROOF OF SERVICE

I, Kellys Yossany Reveron Cornejo, declare under penalty of perjury that on November 4, 2025, I served a copy of the Petition for Writ of Habeas Corpus to the following recipients by U.S. Mail:

1. U.S. District Court – Southern District of Texas (Houston Division)

515 Rusk St., Houston, TX 77002

2. U.S. Attorney's Office – Southern District of Texas (Civil Division)

1000 Louisiana St., Suite 2300, Houston, TX 77002

3. ICE – Office of Chief Counsel (Houston)

126 Northpoint Dr., Houston, TX 77060

4. ICE – Houston Field Office Director

126 Northpoint Dr., Houston, TX 77060

Executed on November 4, 2025, in Houston, Texas, pursuant to 28 U.S.C. § 1746.

Signed: Kellys Reveron

Name: Kellys Yossany Reveron Cornejo

Date: 11/04/2025