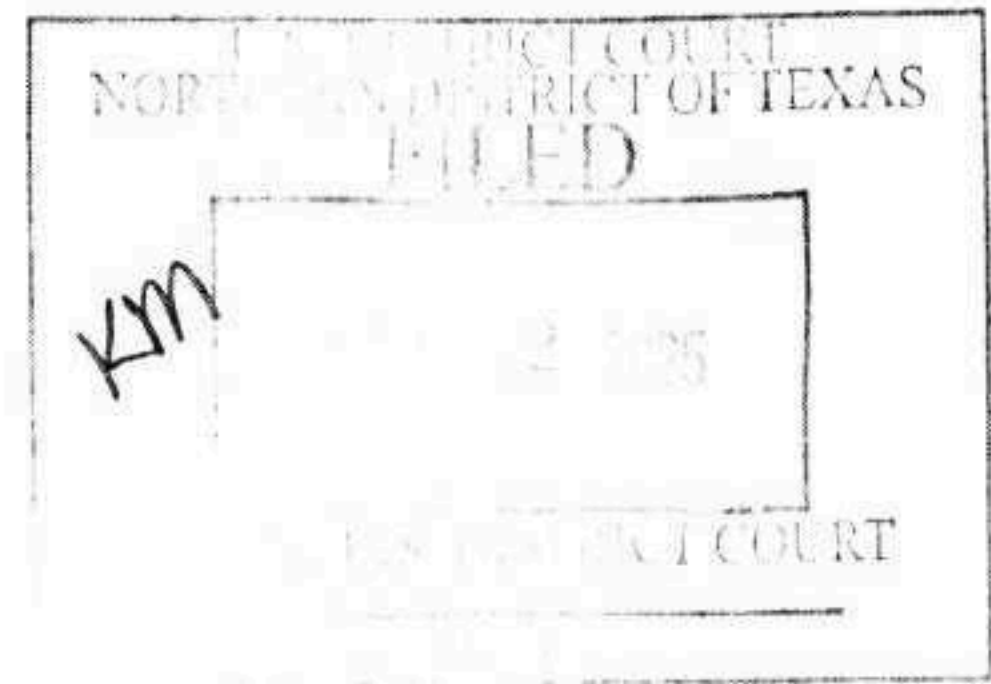


UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS



Petitioner:

Euberto José Giordani Ramirez

A# 

Currently detained at:

PrairieLand Detention Center

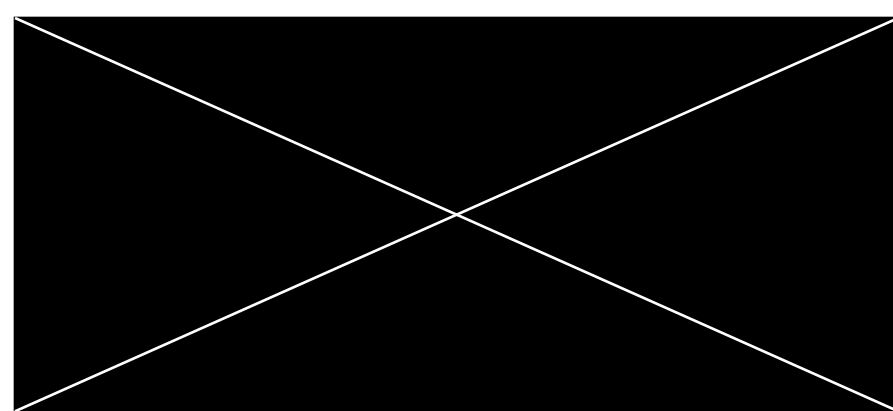
Alvarado, Texas

3 - 25 CV 3300 - S

By and through his partner and next friend:

Angellys Difrisko Flores

A# 



Email: Angellys.difrisko06@gmail.com

v.

Merrick B. Garland, Attorney General of the United States;

Field Office Director, PrairieLand Detention Center;

U.S. Department of Homeland Security (DHS);

U.S. Immigration and Customs Enforcement (ICE);

and all other persons having custody of Petitioner.

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

TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT:

Petitioner, Euberto José Giordani Ramirez, A[REDACTED] by and through his partner and next friend, Angellys Difrisko Flores, respectfully petitions this Honorable Court for a writ of habeas corpus pursuant to 28 U.S.C. §2241, and states:

I. INTRODUCTION

1. Petitioner is a Venezuelan national born on [REDACTED]
2. Petitioner entered the United States on September 6, 2023, and has complied with all immigration requirements.
3. Petitioner was detained on November 10, 2025, in an irregular and warrantless arrest while at Walmart working as a Spark Driver.
4. The officer who detained him presented no judicial warrant, no ICE warrant, and no probable cause, stating only that "he needed to take him."
5. Petitioner has a pending asylum case, demonstrating his commitment to pursuing lawful immigration relief.
6. Petitioner is the primary emotional and financial support for his family.
7. Although Petitioner does not have biological children, he fulfills the role of stepfather to his partner's two minor children.
8. His detention has caused severe emotional, financial, and psychological harm to the family.
9. Petitioner is currently detained at Prairieland Detention Center in Alvarado, Texas.

II. JURISDICTION AND VENUE

10. This Court has jurisdiction under 28 U.S.C. §2241

11. Venue is proper in the Northern District of Texas as Petitioner is detained within this district.

III. FACTUAL BACKGROUND

12. Petitioner lawfully entered the country on September 6, 2023.

13. Petitioner filed for asylum and his case remains pending.

14. On November 10, 2025, while waiting for a Spark Driver order at Walmart, an officer approached Petitioner without a judicial warrant or valid basis, resulting in an arbitrary arrest.

15. Petitioner has no criminal history or record of violence.

16. Petitioner supports the household, paying rent, food, transportation, and other expenses.

17. His detention has left the family without emotional or financial support.

18. Petitioner has complied with all immigration obligations and does not present a flight risk.

19. ICE failed to consider alternatives to detention such as supervised release or parole.

IV. LEGAL BASIS FOR RELIEF

20. Petitioner's continued detention violates the Due Process Clause of the Fifth Amendment.

21. Arrest and detention without a judicial warrant or probable cause are unlawful and unconstitutional.

22. The arrest lacked legal justification, rendering the resulting detention unlawful.

23. ICE's failure to consider less restrictive alternatives violates federal standards.

24. Petitioner's detention is excessive, punitive, and not narrowly tailored to legitimate governmental interests.

V. REQUEST FOR RELIEF

Petitioner respectfully requests that this Court:

1. Issue a Writ of Habeas Corpus ordering his immediate release;
2. Order ICE to consider alternatives to detention such as supervised release or parole;
3. Grant any further relief deemed just and proper.

VI. DECLARATION OF NEXT FRIEND

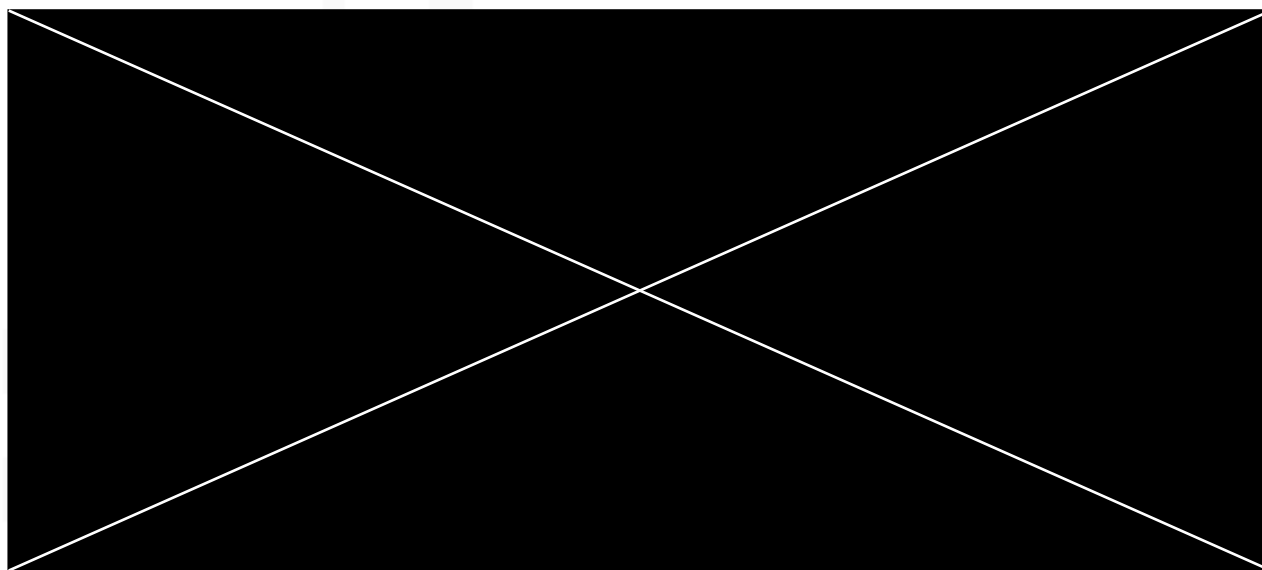
I, Angellys Difrisko Flores, A#  declare under penalty of perjury:

- That I am the partner of Petitioner, Euberto José Giordani Ramirez;
- That I am acting on his behalf because he is currently detained and unable to represent himself;
- That the information in this petition is true and correct to the best of my knowledge.

Angellys Difrisko

Angellys Difrisko Flores

Next Friend / Partner



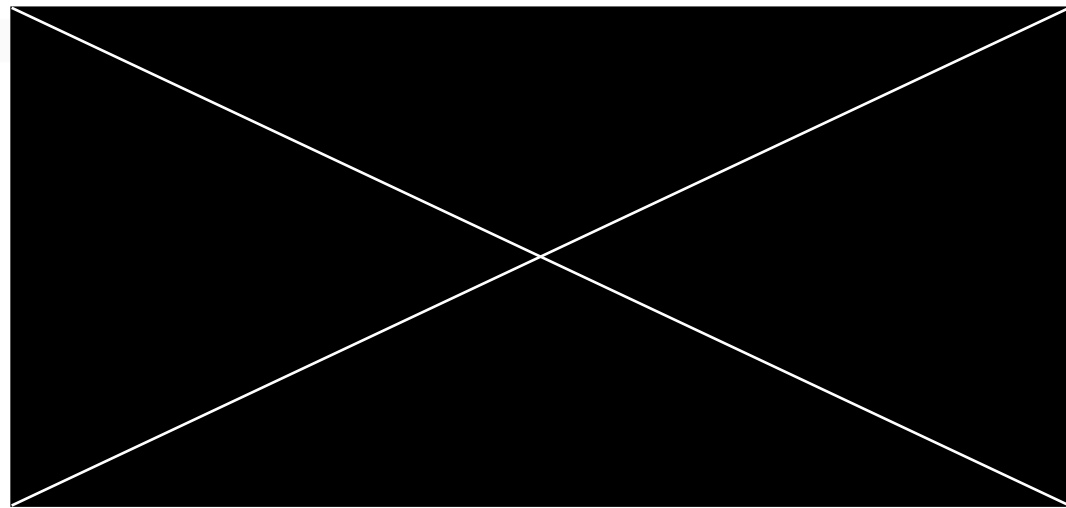
Date: 11/24/2025

EXPLANATORY LETTER

Submitted by:

Angellys Difrisco Flores

A#



RE: Support Letter for Habeas Corpus Petition on behalf of

Euberto José Giordani Ramirez, A#

To the Honorable Judge of the United States District Court:

My name is Angellys Difrisco Flores, A# and I respectfully submit this explanatory letter in support of the Habeas Corpus Petition filed on behalf of my partner, Euberto José Giordani Ramirez, A# who is currently detained at Prairieland Detention Center.

Euberto entered the United States on September 6, 2023, and has complied with all requirements of his immigration process. On November 10, 2025, he was detained in an irregular and warrantless arrest while he was waiting for a Spark Driver order at Walmart. The officer who approached him did not have a judicial warrant, an ICE warrant, or any legal basis for arresting him. His detention was arbitrary and has caused devastating consequences for our family.

Although Euberto does not have biological children, he is the stepfather to my two minor children. He has been their emotional support, caregiver, and a stable father figure in their lives. His absence has caused emotional distress to the children, who ask for him every day.

Euberto is also the financial provider of our household. He covered rent, utilities, food, transportation, and all other expenses. Since his detention, our household has suffered severe financial hardship, and I am struggling to meet the basic needs of our children.

Euberto has no criminal record, no history of violence, and has complied fully with his asylum case, which remains pending. He does not pose a danger to the community or a flight risk. His continued detention is unnecessary, harmful, and unjust.

I respectfully ask this Court to consider the profound emotional and financial harm that Euberto's detention has caused to our family, and to grant his release while his case continues. I submit this letter truthfully and in good faith as the person most affected by his absence.

Thank you for your time and consideration.

Respectfully,

Angellys Difrisco

Angellys Difrisco Flores

Next Friend / Partner

Date: 11/24/2025

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

Petitioner:

Euberto José Giordani Ramírez

A# 

Detained at Prairieland Detention Center

v.

Merrick B. Garland, Attorney General of the United States, et al.

PROOF OF SERVICE

I, Angellys Difriscò Flores, A#  declare under penalty of perjury that on the date indicated below, I served a true and correct copy of the following documents:

- Petition for Writ of Habeas Corpus under 28 U.S.C. §2241
- Explanatory Letter in Support of the Petition

These documents were served via U.S. Postal Service (USPS) to the following recipients:

1. Office of the Attorney General of the United States

U.S. Department of Justice

950 Pennsylvania Avenue, NW

Washington, DC 20530-0001

2. U.S. Attorney for the Northern District of Texas

U.S. Attorney's Office

1100 Commerce Street, 3rd Floor

Dallas, TX 75242

3. Prairieland Detention Center – Warden / Field Office Director

Prairieland Detention Center

1200 E Thompson St

Alvarado, TX 76009

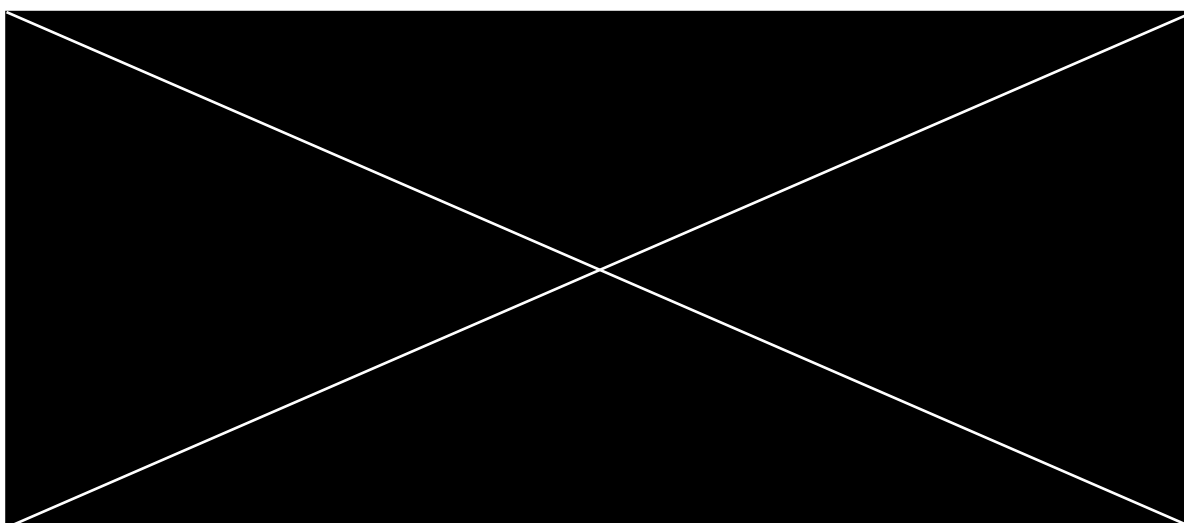
DECLARATION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Angellys Difrisko

Angellys Difrisko Flores

Next Friend / Petitioner's Partner



Date

11/24/2025

 For: EUBERTO JOSE GIORDANI RAMIREZ



U.S. Customs and Border Protection

Securing America's Borders

Most Recent I-94

Admission (I-94) Record Number : 

Most Recent Date of Entry: 2023 September 06

Class of Admission : DT

Admit Until Date : 09/04/2024

Details provided on the I-94 Information form:

Last/Surname : GIORDANI RAMIREZ

First (Given) Name : EUBERTO JOSE

Birth Date : 

Document Number : 

Country of Citizenship : Venezuela

[Get Travel History](#)

▶ Effective April 26, 2013, DHS began automating the admission process. An alien lawfully admitted or paroled into the U.S. is no longer required to be in possession of a preprinted Form I-94. A record of admission printed from the CBP website constitutes a lawful record of admission. See 8 CFR § 1.4(d).

▶ If an employer, local, state or federal agency requests admission information, present your admission (I-94) number along with any additional required documents requested by that employer or agency.

▶ Note: For security reasons, we recommend that you close your browser after you have finished retrieving your I-94 number.

CBP Form I-94/94A
September 2013 Edition

[For inquiries or questions regarding your I-94, please click here](#)

[Accessibility | Privacy Policy](#)

[Privacy & Terms](#)

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
DALLAS IMMIGRATION COURT

LEAD FILE: [REDACTED]
IN REMOVAL PROCEEDINGS
DATE: Aug 19, 2025

TO: GIORDANI RAMIREZ, EUBERTO
204 NORTH ALDER
ALLEN, TX 75002

RE: [REDACTED] GIORDANI RAMIREZ, EUBERTO

Notice of In-Person Hearing

Your case has been scheduled for a MASTER hearing before the immigration court on:

Date: Nov 26, 2025
Time: 08:30 A.M. CT
Court Address: 1100 COMMERCE ST., SUITE 1060
SUITE 1060, COURTROOM #6, DALLAS, TX 75242

Representation: You may be represented in these proceedings, at no expense to the Government, by an attorney or other representative of your choice who is authorized and qualified to represent persons before an immigration court. If you are represented, your attorney or representative must also appear at your hearing and be ready to proceed with your case. Enclosed and online at <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers> is a list of free legal service providers who may be able to assist you.

Failure to Appear: If you fail to appear at your hearing and the Department of Homeland Security establishes by clear, unequivocal, and convincing evidence that written notice of your hearing was provided and that you are removable, you will be ordered removed from the United States. Exceptions to these rules are only for exceptional circumstances.

Change of Address: The court will send all correspondence, including hearing notices, to you based on the most recent contact information you have provided, and your immigration proceedings can go forward in your absence if you do not appear before the court. If your contact information is missing or is incorrect on the Notice to Appear, you must provide the immigration court with your updated contact information within five days of receipt of that notice so you do not miss important information. Each time your address, telephone number, or email address changes, you must inform the immigration court within five days. To update your contact information with the immigration court, you must complete a Form EOIR-33 either online at <https://respondentaccess.eoir.justice.gov/en/> or by completing the enclosed paper form and mailing it to the immigration court listed above.