


**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

United States Courts
Southern District of Texas
FILED

DEC 15 2025

SOLOMON AYOR,
(A-Number: 
Petitioner, by and through his Next Friend,
Chinwe Irene Ayor,

Nathan Ochsner, Clerk of Court

v.

ATTORNEY GENERAL OF THE UNITED STATES;
SECRETARY OF HOMELAND SECURITY;
FIELD OFFICE DIRECTOR, ICE ERO HOUSTON;
WARDEN, HOUSTON PROCESSING CENTER,

Respondents.

Civil Action No.: _____

**EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS
(28 U.S.C. § 2241) AND COMPLAINT FOR DECLARATORY &
INJUNCTIVE RELIEF**

I. PRELIMINARY STATEMENT & URGENCY

This is an emergency Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 and an Emergency Motion for Temporary Restraining Order challenging the unlawful, arbitrary, and punitive detention of **Solomon Ayor** by Immigration and Customs Enforcement (“ICE”). Immediate judicial intervention is required to prevent removal or transfer that would moot this Court’s jurisdiction and cause irreparable harm.

II. JURISDICTION & VENUE

This Court has jurisdiction under 28 U.S.C. § 2241 because Petitioner is in federal custody within the Southern District of Texas. Venue is proper because Petitioner is detained at the Houston Contract Detention Facility within this District.

III. PARTIES

Petitioner Solomon Ayor (DOB [REDACTED], A# [REDACTED]) is currently detained at the Houston Contract Detention Facility.

Chinwe Irene Ayor is a United States citizen, the lawful spouse of Petitioner, and files this action as next friend due to Petitioner's detention.

Respondents include the Attorney General of the United States; Secretary of Homeland Security; ICE Field Office Director; Warden Houston Processing Center (HPC)

IV. STATEMENT OF FACTS

Petitioner entered the United States in 2011 and has resided continuously since that time. He has no criminal history and complied fully with ICE supervision for more than thirteen years.

USCIS approved Petitioner's Form I-130 immigrant visa petition on July 21, 2020. Petitioner is the sole financial provider for three minor United States citizen children under the age of ten.

Petitioner filed a Motion to Reopen with the Board of Immigration Appeals on November 26, 2025, and filed Form I-212 on November 18, 2025, which remains pending. Despite this, ICE detained Petitioner at a routine check-in on November 14, 2025 without individualized assessment.

V. DUE PROCESS VIOLATION

Civil immigration detention must bear a reasonable relationship to removal and may not be arbitrary or punitive. See *Zadvydas v. Davis*, 533 U.S. 678 (2001). ICE's continued detention of Petitioner despite an approved I-130, pending I-212, and strong family ties violates the Fifth Amendment Due Process Clause.

VI. SUSPENSION CLAUSE VIOLATION

The Suspension Clause guarantees meaningful access to habeas corpus. Removal or transfer of Petitioner before adjudication of this Petition would render judicial review meaningless and constitute an unconstitutional suspension of the writ.

VII. PRAYER FOR RELIEF

Petitioner respectfully requests that this Court grant the writ of habeas corpus, order his immediate release or a prompt bond hearing, enjoin ICE from removing or transferring him while this action is pending, and grant all other relief the Court deems just and proper.

VERIFICATION

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



Chinwe Irene Ayor Next Friend / Pro Se