

1. Petitioner:

- Name: Rafael José Romero López
- A# [REDACTED]
- Date of Birth: [REDACTED]
- Nationality: Venezuelan
- Detained at: Bluebonnet Detention Center

2. Next Friend:

- Name: Emili Sttephany Rodríguez de Romero
- A# [REDACTED]
- Date of Birth: [REDACTED]
- Address: [REDACTED] Dallas, TX 75287
- Phone: [REDACTED]
- Email: [REDACTED]

II. JURISDICTION AND VENUE

Jurisdiction is proper under 28 U.S.C. §2241, as Petitioner challenges the legality of his detention. Venue is proper in the Western District of Texas because Petitioner is detained within this District.

III. STATEMENT OF FACTS

1. Petitioner entered the United States on August 29, 2022, and was detained for approximately three months until his release on November 15, 2022. He complied fully with all ICE requirements following his release.

2. Petitioner fled Venezuela because his life was in imminent danger due to threats from criminal groups.

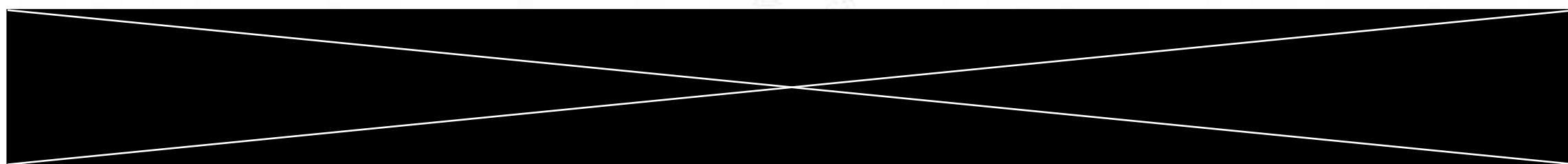
3. Petitioner applied for asylum. Although the Immigration Judge found his testimony and claims credible, the claim was denied based on a misunderstanding regarding why his wife had not left Venezuela at the same time. Petitioner explained he only had enough money to leave first, while his wife hid in her mother's home in another city until he could gather the funds to help her escape.

4. Petitioner and his wife share a minor daughter, who has suffered severe emotional and academic deterioration due to her father's detention. She has stopped eating normally, her grades have declined, and she is under emotional distress.

5. Petitioner was the emotional and financial provider of his household. He maintained stable employment and attended every single ICE check-in without fail.

6. Petitioner was again detained by ICE on November 4, 2025, despite having no criminal history in the United States or Venezuela. He is a model husband, father, and community member.

7. After Petitioner's detention, the criminal group in Venezuela discovered his situation and



8. Petitioner has suffered physical and emotional deterioration during detention, including weight loss, poor nutrition, and high levels of anxiety due to family separation and detention conditions.

9. During video calls, Petitioner appears afraid to speak openly. He tells his wife that "everything is recorded," suggesting possible psychological intimidation inside the facility.

10. Petitioner has an approved credible fear interview, confirming that he faces a high risk of persecution, torture, or death if returned to Venezuela.

IV. LEGAL BASIS FOR RELIEF

1. The Fifth Amendment prohibits prolonged, punitive, or unnecessary detention, especially when the individual poses no danger or flight risk.

2. Petitioner has no criminal history, has demonstrated compliance with ICE, and has substantial family ties in the United States.

3. Under *Zadvydas v. Davis*, detention cannot be indefinite or punitive where removal is not reasonably foreseeable, particularly when the individual has credible fear established.

4. Petitioner faces imminent danger if deported. His credible fear approval, combined with recent violent attacks on his family, establishes extreme risk.

5. ICE has alternatives to detention, including supervised release, ankle monitoring, or periodic check-ins—methods Petitioner has already demonstrated he can comply with.

V. REQUEST FOR RELIEF

Petitioner respectfully requests that this Court:

1. Order his immediate release from ICE custody;
2. Permit supervised release or alternative conditions of supervision;
3. Grant any further relief that the Court deems appropriate.

VI. DECLARATION OF NEXT FRIEND

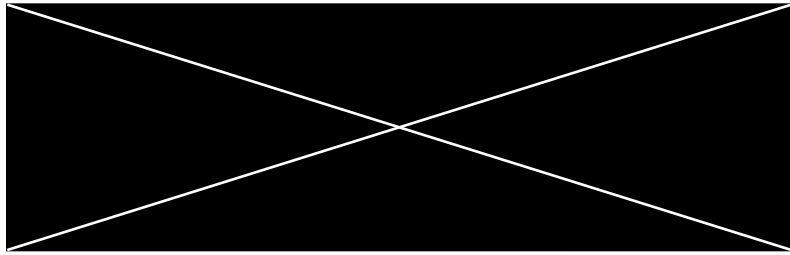
I, Emili Sttephany Rodríguez de Romero, declare under penalty of perjury that:

- I am the wife of the Petitioner;
- Petitioner is unable to file this petition himself due to his detention;
- I submit this petition on his behalf as his next friend.

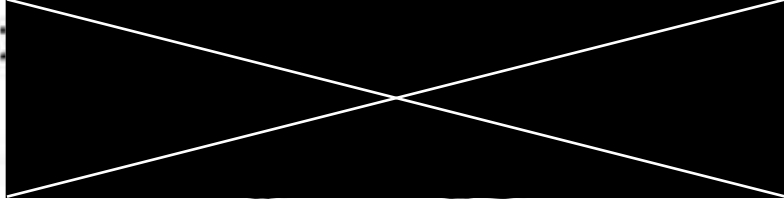
Respectfully submitted,

Emili Sttephany Rodríguez de Romero

Next Friend / Wife



Phone:



Email:

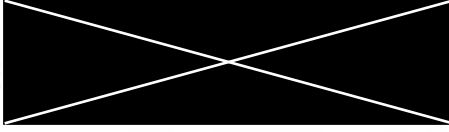
Date: 12-08-2025

LETTER OF SUPPORT AND EXPLANATION

From: Emili Sttephany Rodríguez de Romero


In support of: Rafael José Romero López

A#:



Date: 12-08-25

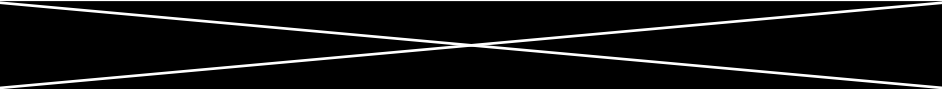
TO THE HONORABLE JUDGE OF THE UNITED STATES DISTRICT COURT:

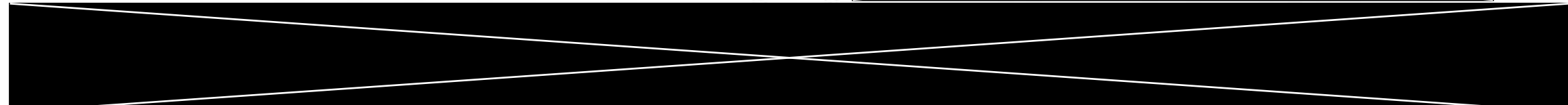
My name is Emili Sttephany Rodríguez de Romero, A#  and I respectfully submit this letter in support of my husband, Rafael José Romero López, who is currently detained at the Bluebonnet Detention Center. I write this letter as his wife, his next friend, and the person who knows most deeply the suffering, danger, and emotional harm that his continued detention has caused to our family.

My husband entered the United States on August 29, 2022, after fleeing Venezuela because his life was in imminent danger. We only had enough money for one person to leave the country at that time. I was forced to hide in another city with my mother until he could gather the funds to help me escape as well. The threats against him and our family were very real and very serious.

After being detained for three months upon his entry, Rafael was released on November 15, 2022, and since then he complied with every single ICE check-in, never missing any appointment. He worked hard to support us and was the emotional and economic foundation of our home. Rafael is a good man, a responsible father, and a loving husband. He has no criminal record, neither in the United States nor in Venezuela.

We have a minor daughter, and she has suffered tremendously since her father was detained again on November 4, 2025. She has become emotionally unstable, has stopped eating normally, cries for her father every day, and her academic performance has significantly declined. As her mother, I am extremely worried about the long-lasting emotional harm this separation is causing her.

After Rafael's detention, the same criminal group 


member. These threats have placed our entire family in extreme fear. Returning my husband to Venezuela would put him—and us—in grave danger.

During our video calls, my husband is afraid to speak freely. He looks nervous and tells me that "everything is recorded," which makes me believe he may be experiencing psychological pressure or intimidation inside the detention center. He also looks weak, sad, and physically deteriorated due to poor nutrition and the emotional stress of being separated from us.

Rafael has an approved credible fear interview, confirming the danger he faces if removed from the United States. Keeping him detained serves no purpose and only worsens the harm already done to him and to our family. ICE has alternatives to detention, and Rafael has shown he can comply with all requirements responsibly.

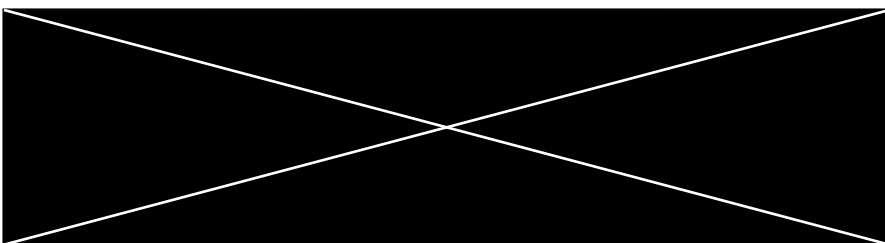
For all these reasons, I respectfully ask this Honorable Court to please grant his immediate release so that he can reunite with his family, continue supporting our daughter, and remain safe from the threats that await him in Venezuela.

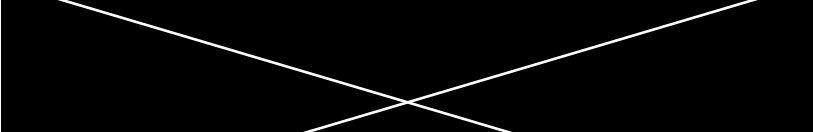
Respectfully submitted,

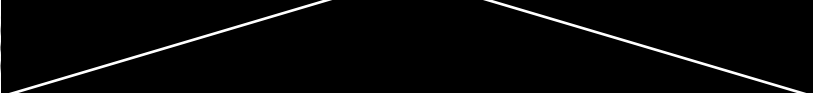


Emili Sttephany Rodríguez de Romero

Next Friend / Wife



Phone: 

Email: 

PROOF OF SERVICE

I, Emili Sttephany Rodríguez de Romero, declare under penalty of perjury under the laws of the United States of America that I served a copy of the Petition for Writ of Habeas Corpus under 28 U.S.C. §2241 for Rafael José Romero López, A# [REDACTED] on the following parties by U.S. Mail on the date indicated below:

1. U.S. Attorney for the Western District of Texas

Civil Process Clerk

U.S. Attorney's Office

601 NW Loop 410, Suite 600

San Antonio, TX 78216

2. Attorney General of the United States

U.S. Department of Justice

950 Pennsylvania Avenue, NW

Washington, DC 20530

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

Office of the General Counsel

2707 Martin Luther King Jr. Ave SE

Washington, DC 20528

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

Office of the Principal Legal Advisor (OPLA)

Texas & Oklahoma Field Office

8101 N. Stemmons Freeway

Dallas, TX 75247

5. Warden of Bluebonnet Detention Center

Bluebonnet Detention Center

1121 FM 342

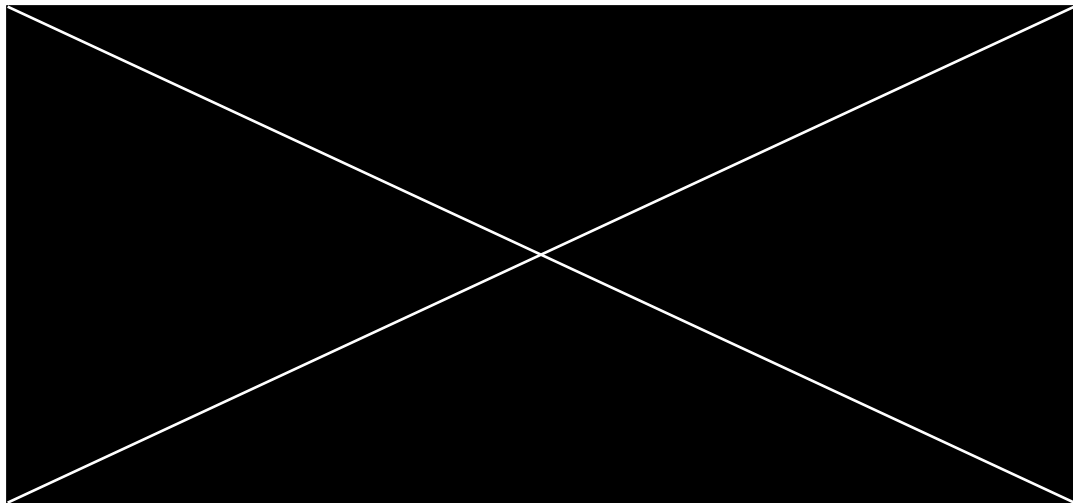
Anson, TX 79501

I certify that the foregoing is true and correct.

Date: 12-08-25


Signature: 

Name: Emili Sttephany Rodríguez de Romero



Department of Homeland Security
U.S. Citizenship and Immigration Services

Record of Determination/Credible Fear Worksheet

ZHN		ROMERO-LOPEZ
Asylum Office Code	A File Number	Noncitizen's Last/ Family Name
Amerson	Michael T	Venezuela
Asylum Officer's Last Name	Asylum Officer's First Name	Noncitizen's Nationality

All statements in italics must be read to the applicant

SECTION I:

INTERVIEW PREPARATION

- 1.1 Date of arrival [MM/DD/YY]: 08/29/22
- 1.2 Port of arrival: Unknown
- 1.3 Detention status at interview:
 - Detained
 - Non-detained
- 1.4 If detained, date of detention [MM/DD/YY]: 08/29/22
- 1.5 If detained, place of detention: El Paso Detention Center, 8915 Montana Avenue, El Paso, TX 79925
- 1.6 Non-detained address (applicant's residence in the US if non-detained/intended destination upon release from detention):


Dallas, TX
- 1.7 Date of interview [MM/DD/YY]: 09/14/22
- 1.8 Interview site (applicant's location): El Paso, TX (Telephonic)
- 1.9 Interview mode:
 - In person
 - Telephonic
 - Video
- 1.10 Applicant received and signed Form M-444 and relevant *pro bono* list Yes No

Date signed [MM/DD/YY]: 08/31/22
- 1.11 If orientation more than one week from date of detention, explain delay: N/A
- 1.12 Does applicant have consultant(s)/representative? Yes No

If yes, consultant(s)/representative name, address, telephone number and relationship to applicant:
N/A
- 1.13 Persons present at the interview (check which apply and indicate if in person or by telephone or video conference)
 - Consultant _____
 - Representative _____
 - Other(s), list: _____
 - No one other than applicant, asylum officer, and the interpreter (if applicable).
- 1.14 Language used by applicant in interview: Spanish
- 1.15 Interpreter used in interview? Yes No

If interpreter used in interview, was the interpreter a contractor or provided by the applicant?

 - Contractor
 - Applicant provided

A File Number: 

1 16 Asylum officer read the following paragraph to the applicant at the beginning of the interview:

The purpose of this interview is to determine whether you may be eligible for asylum or protection from removal to a country where you fear persecution or torture. I am going to ask you questions about why you fear returning to your country or any other country you may be removed to. It is very important that you tell the truth during the interview and that you respond to all of my questions. This may be your only opportunity to give such information. Please feel comfortable telling me why you fear harm. U.S. law has strict rules to prevent the disclosure of what you tell me today about the reasons why you fear harm. The information you tell me about the reasons for your fear will not be disclosed to your government, except in exceptional circumstances. The statements you make today will be used in deciding your claim and may be used in any future immigration proceedings. It is important that we understand each other. If at any time you do not understand me, please stop me and tell me you do not understand so that I can explain it to you. If at any time you tell me something I do not understand, I will ask you to explain.

SECTION II:

BIOGRAPHIC INFORMATION

2 1 ROMERO-LOPEZ

Last Name/ Family Name [ALL CAPS]

2 2 Rafael

First Name

2 3 Jose

Middle Name

2 4 

Date of birth [MM/DD/YY]

2 5

Gender: Male

2 6

N/A

Other names and dates of birth used

2 7

Venezuela

Country of birth

2 8

Venezuela

Country (countries) of citizenship (list all)

2 9 

Address prior to coming to the U.S. (List Address, City/Town, Province, State, Department and Country).

2 10

Latin

2 11

Catholic

2 12

Spanish

Applicant's race or ethnicity

Applicant's religion

All languages spoken by applicant

2 13

Marital status:

Single

Married

Legally separated

Divorced

Widowed

2 14 Did spouse arrive with applicant?

Yes


No

2 15 Is spouse included in applicant's claim?

Yes

No

2 16 If currently married (including common law, informal marriage) list spouse's name, citizenship, and present location (if with applicant, provide A-Number):

 Citizenship: Venezuela; Location/A#: Venezuela

A File Number: [REDACTED]

2.17 Children: Yes No

2.18 List any children (Use the continuation section to list any additional children):

Date of birth (MM/DD/YY)	Name	Citizenship	Present location (if w/PA, list A-Numbers)	Did child arrive with PA?	Is child included in PA's claim?
[REDACTED]	Romero Rodriguez	Venezuela	Venezuela	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
				<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
				<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
				<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
				<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No

2.19 Does applicant claim to have a medical condition (physical or mental), or has the officer observed any indication(s) that a medical condition exists? If YES, answer questions 2.20 and 2.21 and explain below. Yes No

2.20 Has applicant notified the facility of medical condition? Yes No

2.21 Does applicant claim that the medical condition relates to torture? Yes No

2.22 Does applicant have an email address? Yes No

2.23 If yes, please list all email addresses for the applicant:
[REDACTED]

2.24 If yes, can the applicant receive confidential information related to their asylum case at the above email address(es)? Yes No

2.25 Does applicant have a US phone number? Yes No

2.26 If yes, please list phone number and type (mobile/landline):
[REDACTED]

2.27 What is the highest level of education the applicant has completed?
 None Primary Secondary
 Post-secondary Other

SECTION III: CREDIBLE FEAR INTERVIEW

The attached notes are not a verbatim transcript of this interview. These notes are recorded to assist the individual officer in making a credible fear determination and the supervisory asylum officer in reviewing the determination. There may be areas of the individuals claim that were not explored or documented for the purposes of this threshold screening.

The asylum officer shall elicit all relevant and useful information bearing on whether the applicant has a credible fear of persecution or torture. Typed Question and Answer (Q&A) interview notes and a summary of material facts as stated by the applicant, any additional facts relied upon by the officer, and analysis of the claim must be attached to this form for all credible fear decisions. These Q&A notes must reflect that the applicant was asked to explain any inconsistencies or lack of detail on material issues and that the applicant was given every opportunity to establish a credible fear of persecution or torture.

3.1 At the conclusion of the interview, the asylum officer must read a summary of the claim to the applicant.

SECTION IV: CREDIBLE FEAR FINDINGS

A File Number: XXXXXXXXXX

A. Credible Fear Determination:

Credibility

- 4.1 Applicant found credible.
- 4.2 Applicant found not credible.

Nexus

- 4.3 Race 4.4 Religion 4.5 Nationality 4.6 Membership in a Particular Social Group

(Define the social group):

- 4.7 Political Opinion 4.8 Coercive Family Planning [CFP] 4.9 No Nexus

Credible Fear Finding

- 4.10 Credible fear of persecution established.
- OR
- 4.11 Credible fear of torture established.
- OR
- 4.12 Credible fear of persecution NOT established and credible fear of torture NOT established.

B. Possible Bars:

- 4.13 There are reasonable grounds to believe that the applicant may be subject to a bar(s) to asylum or withholding of removal (check the box(es) that applies):
 - 4.14 Particularly Serious Crime 4.15 Security Risk 4.16 Aggravated Felon
 - 4.17 Persecutor 4.18 Terrorist 4.19 Firmly Resettled
 - 4.20 Serious Non-Political Crime Outside the United States
- 4.21 Applicant does not appear to be subject to a bar(s) to asylum or withholding of removal.

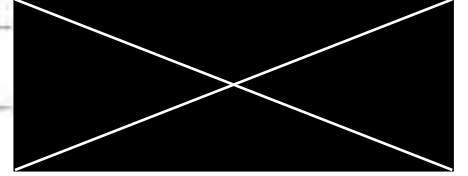
C. Identity:

- 4.22 Applicant's identity was determined with a reasonable degree of certainty (check the box(es) that applies):
 - 4.23 Applicant's own credible statements. (If testimony is credible overall, this will suffice to establish the applicant's identity with a reasonable degree of certainty).
 - 4.24 Passport which appears to be authentic.
 - 4.25 Other evidence presented by applicant or in applicant's file (List): _____
- 4.26 Applicant's identity was not determined with a reasonable degree of certainty. (Explain on the continuation sheet.)

SECTION V: ASYLUM OFFICER / SUPERVISOR NAMES AND SIGNATURES

5.1 Michael T Amerson, ZHN835	5.2 	5.3 09/14/22
Asylum officer name and ID CODE (print)	Asylum officer's signature	Asylum officer decision date
5.4 Kirk R. Wills, ZHN 046	5.5 	5.6 09 / 15 / 2022
Supervisory asylum officer name	Supervisor's signature	Date supervisor approved decision

A File Number:



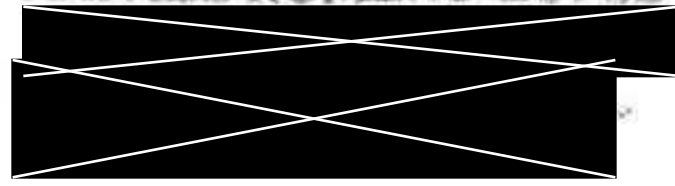
ADDITIONAL INFORMATION/CONTINUATION

See Q&A

Individual did not establish that it is more likely than not that he meets the class definition in *Al Otro Lado v. Wolf*.

RAFAEL ROMERO-LOPEZ

Printed: January 24, 2025 10:07:04 AM



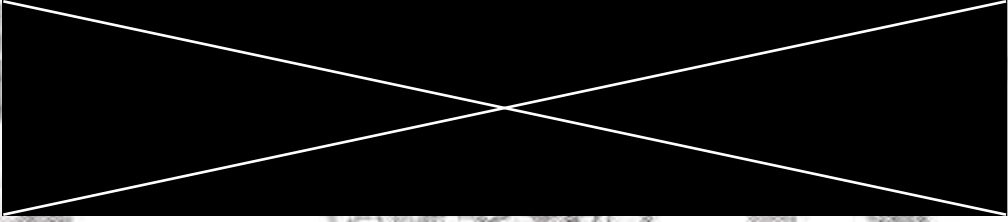
Next Reporting Date:

April 08, 2025 between 8:00 AM and 9:00 AM

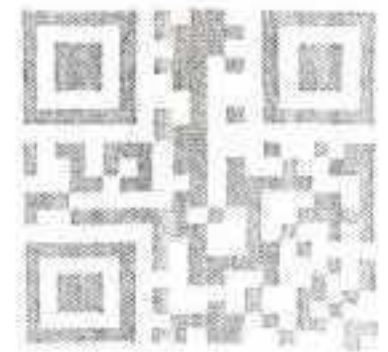
Participant reported on April 30, 2024. Identity verified through CART.

For information on an Immigration court case, please go to: <https://acis.eoir.justice.gov> or call 800-898-7180.

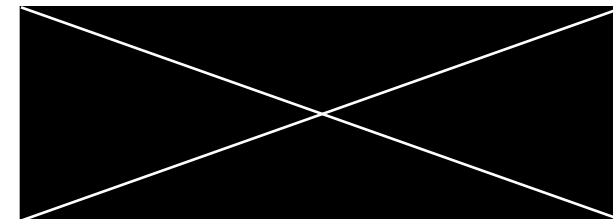
Please keep this receipt with your records. Store receipt away from sunlight.



ICE



I-220R

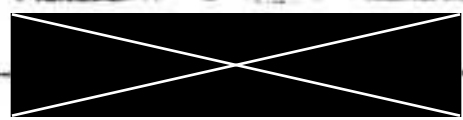


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DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

Date: 11/15/2022

In Reference to: A #



INTERIM NOTICE AUTHORIZING PAROLE

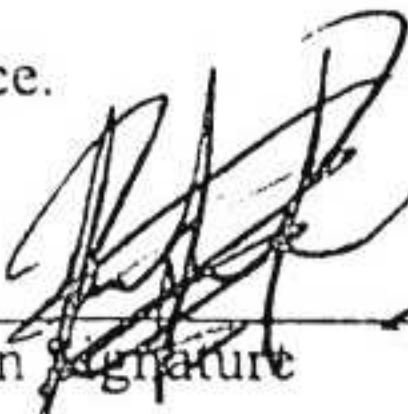
This letter is to inform you that U.S. Immigration and Customs Enforcement (ICE) has decided to parole you from its custody pursuant to its authority under section 212(d)(5)(A) of the Immigration and Nationality Act. This notice is being issued to you in lieu of Form I-94, *Arrival-Departure Record*, see 8 C.F.R. § 235.1(h)(2), and you should maintain a copy of this letter in your possession at all times.

Your parole authorization is valid for one year beginning from the date on this notice and will automatically terminate upon your departure or removal from the United States or at the end of the one-year period unless ICE provides you with an extension at its discretion. ICE may also terminate parole on notice prior to the automatic termination date. Parole is entirely within the discretion of ICE and can be terminated at any time and for any reason. Your parole is not valid for work authorization and is not an admission in lawful status.

Parole is conditioned on you complying with the terms and conditions of your release. You must notify ICE and the immigration judge of any address correction or address change. You must report for every scheduled hearing before the immigration court and every appointment as directed by ICE (including for removal from the United States should you become subject to a final removal order). You must not violate any local, State or Federal laws or ordinances. You must comply with any other specified conditions if identified separately.

I certify that I received a copy of this notice.

Romero-Lopez, Rafael Jose
Alien Name


Alien Signature

11/15/2022
Date

CERTIFICATE OF SERVICE

I certify that on today's date, I served the respondent a copy of this parole notice by the following method (as checked):

In person Other: _____

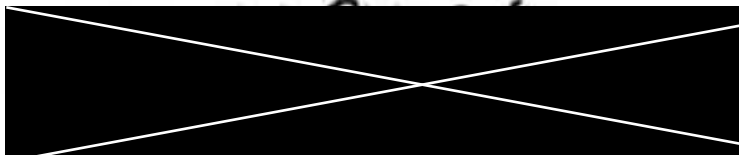
F.BOWIE
ICE Official Name


ICE Official Signature


11/15/2022
Date

Dallas, Texas - December 6, 2025

Honorable Immigration Judge

Re: Support Letter for Rafael Jose'
Romero Lopez - A# 

My name is Raimy Stefanni Rodriguez de Romero, I am 15 years old, and I am the daughter of Rafael Jose' Romero Lopez, who is currently detained by Immigration. I am writing this letter with respect and from my heart because I want to explain how important my father is to me and kindly ask that you consider allowing him to return home while his case continues.

My dad has always been a responsible, hardworking man and very present in my life. When he was with us, he was the one who took me to school and picked me up. He helped me with my homework and always encouraged me to do well in my school. He has always been a loving, tive, and dedicate father.

Since he was detained, everything has
[REDACTED] much harder. I miss him very
much, and my life changed from one day
to the next. It has also been very difficult
for my mom, because she is now the
one handling all the household expenses
and the costs of my education, and I
know it has not been easy for her to
manage all of this alone.

My father has never been a problematic
person. He has always complied with
everything he has been asked to do and
has shown that he is my family-oriented
man. I truly need my dad at home, and I
am confident that if you allow him to be
released on bond, he will comply with all
of his responsibilities before the court.

Thanks you very much for taking the time
to read my letter and for considering my
request. I sincerely hope you can give us
the opportunity to have my father back
home with us.

Respectfully,

Raimy Sttefanni de Romero

Signature: Raimy