

II. HABEAS CORPUS BENEFICIARY (DETAINEE)

Name: Andrés Arango

Country of Origin: Colombia

Alien Registration Number (A-Number): 

III. PLACE OF DETENTION

Mr. Andrés Arango is currently detained by U.S. Immigration and Customs Enforcement (ICE) at:

Eden Detention Center
702 E. Broadway
Eden, Texas 76837

IV. JURISDICTION AND VENUE

This Honorable Court has jurisdiction pursuant to 28 U.S.C. § 2241, as Mr. Arango is held in federal immigration custody within the territorial jurisdiction of the United States District Court for the Western District of Texas.

A petition for writ of habeas corpus is the appropriate and necessary mechanism to challenge the constitutional legality of civil immigration detention, particularly where such detention has become prolonged, arbitrary, and unsupported by adequate procedural safeguards, in violation of the Due Process Clause of the Fifth Amendment.

V. NATURE OF THE DETENTION

Mr. Arango is detained solely for civil immigration purposes. He has no criminal conviction and no final order of removal.

Date detention began:

October 23, 2025

Since that date, Mr. Arango has remained continuously deprived of his liberty without meaningful judicial or administrative review.

VI. DECISION OR ACTION CHALLENGED

This petition challenges the ongoing and prolonged immigration detention of Mr. Arango, which has been imposed:

- Without an individualized bond hearing;
- Without sufficient factual or legal justification; and
- Without effective judicial oversight or meaningful procedural protections.

VII. IMMIGRATION PROCEEDINGS

Mr. Arango is currently subject to pending immigration proceedings. As of the filing of this petition:

- No final order of removal exists; and
- No individualized bond hearing has been conducted to assess whether he presents a danger to the community or a risk of flight.

Despite the absence of such determinations, Mr. Arango has remained in ICE custody since October 23, 2025, without an adequate review of the legality or necessity of his continued detention.

VIII. PROPRIETY OF HABEAS CORPUS RELIEF

Mr. Arango continued detention is not the result of a constitutionally valid process. Instead, it constitutes a deprivation of liberty carried out:

- Without a hearing;
- Without a reasoned explanation; and
- Through the misuse of an administrative detention mechanism that has, in practice, become arbitrary and punitive.

Under these circumstances, habeas corpus relief is not only appropriate, but constitutionally required, particularly given the ongoing risk of removal without meaningful judicial review, despite the absence of a final order of removal.

IX. GROUNDS FOR RELIEF

GROUND ONE

Violation of the Fifth Amendment – Due Process Clause.

Mr. Arango has been continuously detained since October 23, 2025, without being afforded an individualized hearing to justify his continued deprivation of liberty.

Prolonged civil immigration detention without meaningful judicial review or individualized assessment violates the Due Process Clause of the Fifth Amendment.

GROUND TWO

Detention Lacks a Reasonable Relationship to a Legitimate Governmental Purpose

Immigration authorities have failed to demonstrate that Mr. Arango poses either:

- A danger to the community, or
- A risk of flight.

As a result, the detention has ceased to be administrative in nature and has become excessive, punitive, and constitutionally impermissible.

GROUND THREE

Severe Infringement of Fundamental Human and Family Rights

Mr. Arango prolonged detention has caused serious and disproportionate harm to:

- His family unity;
- His human dignity; and
- His ability to meaningfully prepare and participate in his immigration defense.

X. NEXT FRIEND STANDING

Ms. Mariana Arbelaez qualifies as Next Friend because:

1. She maintains a close, continuous, and trusted relationship with Mr. Arango as his sentimental partner;
2. She has a genuine, legitimate, and significant interest in his liberty; and
3. Mr. Arango is in federal immigration custody with limited access to effective legal resources, justifying representation through a trusted Next Friend.

XI. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Honorable Court:

1. Declare that Mr. Arango's continued immigration detention violates the United States Constitution;
2. Order his IMMEDIATE RELEASE from ICE custody; and
3. Grant any other relief the Court deems just and proper.

XII. DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that the foregoing is true and correct.

Date: 12/24/2025

Mariana Arbelaez

Mariana Arbelaez

Petitioner – Next Friend of Andres Arango

EXHIBIT A

AFFIDAVIT OF MARIANA ARBELAEZ

I, Mariana Arbelaez, being duly sworn, declare under penalty of perjury as follows:

1. I am an adult individual residing at [REDACTED] Arlington, Texas 76011. I am the sentimental partner of Andrés Arango, and I have personal and direct knowledge of the facts stated in this affidavit.
2. I submit this sworn declaration in support of the Petition for Writ of Habeas Corpus filed on behalf of Andrés Arango, who is currently detained in the custody of the United States Immigration and Customs Enforcement (ICE).
3. Since Mr. Andrés Arango entered the United States, he did so under the ISAP program, and he has consistently complied in a punctual and responsible manner with all conditions and appointments imposed by immigration authorities.
4. Throughout the entire period in which Mr. Arango was under supervision through the ISAP program, he maintained exemplary conduct, attended all required appointments on time, and fully cooperated with immigration authorities. After having been in the program for more than one year, immigration authorities contacted him and placed an electronic monitoring device (ankle monitor) on him.
5. Mr. Arango remained subject to electronic monitoring for approximately one year, during which time he continued to strictly comply with all imposed requirements. At no point was he informed that he had violated any condition or that there was any issue with his case.
6. In approximately mid-June 2025, immigration authorities removed the electronic monitoring device. Again, he was not informed of any violation or irregularity in his conduct.
7. On October 16, 2025, Mr. Arango received a message through the ISAP application instructing him to appear at an ICE office for what was described as a routine interview. The message stated that the purpose of the appointment was to ask questions regarding his immigration process and his prior electronic monitoring, and that it was not an enforcement or arrest action.

8. Based on that information, Mr. Arango voluntarily appeared at the scheduled appointment, relying in good faith on the representation that it was a routine administrative interview, as had occurred on prior occasions.

9. Upon arrival at the ICE office, Mr. Arango was required to wait for more than six hours, during which time he was informed that he was waiting to meet with his ICE officer for the scheduled interview.

10. After this prolonged waiting period, Mr. Arango was informed that he was under arrest. The promised interview never took place, and no explanation was provided as to the reason for his arrest. He was not informed of any violation, charge, or legal basis for his detention.

11. Mr. Andrés Arango was taken into ICE custody on October 23, 2025, after having appeared in good faith for what had been represented to him as a routine appointment. To my knowledge, his detention occurred without a prior hearing, without sufficient explanation, and without any judicial order.

12. Based on my direct knowledge, I can affirm that Mr. Arango has never attempted to evade immigration authorities, has never missed an appointment, and has always complied with all instructions given to him.

13. Mr. Arango's detention has caused significant emotional and personal hardship, particularly given that his arrest occurred despite his cooperative conduct and without any indication that he posed a flight risk or a danger to the community.

14. I submit this affidavit to explain the events leading up to Mr. Arango's detention, to demonstrate his consistent cooperation with ICE, and to establish that his arrest did not result from any misconduct on his part.

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

Executed on: Arlington, Texas

Date: 12/24/2025

Mariana Arbelaez

CERTIFICATE OF SERVICE

I hereby certify that on this 24 day of December, 2025, a true and correct copy of the Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241, together with all attached exhibits, was served by U.S. Mail, first-class postage prepaid, upon the following:

Warden
Eden Detention Center
702 E. Broadway
Eden, Texas 76837

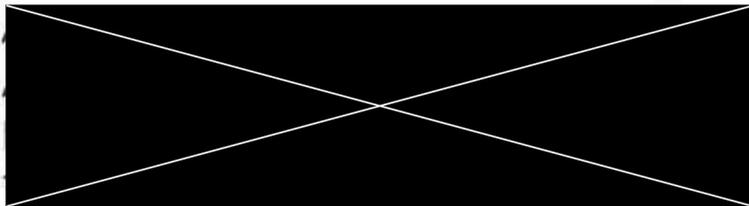
Office of the United States Attorney
Western District of Texas
San Antonio Division
601 NW Loop 410, Suite 600
San Antonio, Texas 78216

Respectfully submitted,

Mariana Arbelaez

Mariana Arbelaez

Petitioner – Next Friend of Andres Arango



Date: 12/24/2025

Clerk of the United States District Court
Northern District of Texas
Abilene Division

Subject: Filing Fee – Petition for Writ of Habeas Corpus

To the Clerk of Court:

Through this letter, I am submitting the payment corresponding to the filing fee required for the submission of a Petition for Writ of Habeas Corpus.

The petitioner is Andrés Arango, Alien Number (A-Number) [REDACTED]

Enclosed please find a money order in the amount of five dollars (\$5.00), payable to the Clerk of the United States District Court, as payment of the filing fee required for the filing of this habeas corpus petition.

I am submitting this money order in my capacity as a family member of the petitioner. My contact information is as follows: email [REDACTED] and telephone number [REDACTED]

I respectfully request that the enclosed payment be associated with the corresponding habeas corpus petition.

Thank you for your time and assistance in this matter.

Sincerely,

Mariana Arbelaez
Mariana Arbelaez

