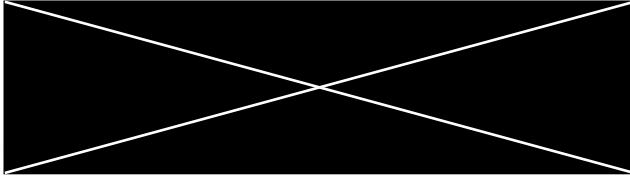


DIANYS VALDÉS CRUSELLAS



United States Courts
Southern District of Texas
FILED
JAN 05 2026
Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

DIANYS VALDÉS CRUSELLAS, §

AS NEXT FRIEND OF §

ARLENYS MARTÍNEZ VALDÉS, §

A#  §

Petitioner, §

v. §

CIVIL ACTION NO. -----

U.S. IMMIGRATION AND §

CUSTOMS ENFORCEMENT (ICE); §

FIELD OFFICE DIRECTOR, §

ICE SAN ANTONIO FIELD OFFICE; §

WARDEN, KARNES COUNTY §

IMMIGRATION PROCESSING CENTER, §

Respondents. §

PETITION FOR WRIT OF HABEAS CORPUS

PURSUANT TO 28 U.S.C. 2241

This Petition challenges the prolonged and unconstitutional immigration detention of Arlenys Martinez Valdes, a Cuban national currently in the custody of U.S. Immigration

and Customs Enforcement at the Karnes County Immigration Processing Center in Karnes City, Texas. Petitioner respectfully seeks her immediate release.

CERTIFICATE OF SERVICE

I, DIANYS VALDÉS CRUSELLAS hereby certify that on this 28th day of December 2025, a true and correct copy of the foregoing Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 was served by United States Postal Service Certified Mail upon the following parties:

1. Clerk of Court

United States District Court
Southern District of Texas
Corpus Christi Division
1133 North Shoreline Boulevard
Corpus Christi, TX 78401

2. Office of the United States Attorney

Southern District of Texas
1000 Louisiana Street, Suite 2300
Houston, TX 77002

3. Karnes County Immigration Processing Center

Attn: Facility Administrator
409 FM 1144
Karnes City, TX 78118

4. U.S. Department of Homeland Security

Immigration and Customs Enforcement (ICE)
Office of the Principal Legal Advisor
Southern District of Texas
1000 Louisiana Street, Suite 700
Houston, TX 77002

12/28/2025
DCC

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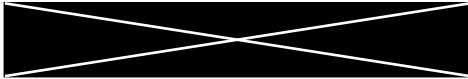
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V. Notarized Affidavit

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

United States Courts
Southern District of Texas
FILED
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Nathan Ochsner, Clerk of Court

DIANYS VALDÉS CRUSELLAS



Miami, FL 33172as Next Friend of

ARLENYS MARTÍNEZ VALDÉS



Petitioner,

v.

Civil Action No.

WARDEN, KARNES COUNTY IMMIGRATION PROCESSING CENTER

ICE FIELD OFFICE DIRECTOR

SECRETARY OF THE DEPARTMENT OF HOMELAND SECURITY

UNITED STATES ATTORNEY GENERAL

Respondents.


PETITION FOR WRIT OF HABEAS CORPUS

PURSUANT TO 28 U.S.C. § 2241

I. INTRODUCTION

ARLENYS MARTÍNEZ VALDÉS was previously released under a Form I-220A on August 12, 2021. She complied with all immigration obligations, filed an application for asylum, and obtained authorization to work legally in the United States.

Despite her compliance, ARLENYS MARTÍNEZ VALDÉS was arrested again on September 19, 2025, without having committed any crime, during a minor traffic stop in which she was not the driver of the vehicle.

ARLENYS MARTÍNEZ VALDÉS () is currently detained at the Karnes County Immigration Processing Center in Karnes City, Texas, housed in Willow Dorm, Court 215, Bed No. 3.

This Petition is filed by me, DIANYS VALDÉS CRUSELLAS, the mother of ARLENYS MARTÍNEZ VALDÉS, and a lawful permanent resident of the United States. I file this Petition as next friend because my daughter is currently detained and cannot file this action on her own behalf. I am deeply concerned about my daughter's physical health and overall well-being.

II. JURISDICTION AND VENUE


This Court has jurisdiction over this Petition pursuant to Article I, Section 9, Clause 2 of the United States Constitution (the Suspension Clause) and 28 U.S.C. §§ 2241 and 2242, which authorize federal courts to review the lawfulness of immigration detention.

This Petition is properly brought by me, DIANYS VALDÉS CRUSELLAS, ARLENYS MARTÍNEZ VALDÉS's mother, a lawful permanent resident of the United States, acting as next friend, because ARLENYS MARTÍNEZ VALDÉS is currently detained and therefore unable to litigate this matter on her own behalf.

Jurisdiction is also proper under the Fifth Amendment to the United States Constitution, which guarantees that no person shall be deprived of liberty without due process of law.

Venue is proper in the Southern District of Texas, Corpus Christi Division, because ARLENYS MARTÍNEZ VALDÉS is detained at the Karnes County Immigration Processing Center in Karnes City, Texas, which is located within this judicial district, and this Court has authority over her immediate custodian.

III. STATEMENT OF FACTS

1. ARLENYS MARTÍNEZ VALDÉS is a Cuban national born on  and a native of Pinar del Río, Cuba.

2. ARLENYS MARTÍNEZ VALDÉS was previously released from immigration custody under a Form I-220A on August 12, 2021, and complied with all conditions imposed by immigration authorities.

3. After her release, ARLENYS MARTÍNEZ VALDÉS remained in the United States, complied with all immigration requirements, filed an application for asylum, and obtained authorization to work legally.

4. On September 19, 2025, ARLENYS MARTÍNEZ VALDÉS was arrested following a minor traffic stop conducted by a local sheriff.


5. At the time of the stop, ARLENYS MARTÍNEZ VALDÉS was a passenger in the vehicle and was not the driver.

6. The traffic stop was based on a minor equipment violation involving a defective light. ARLENYS MARTÍNEZ VALDÉS was not responsible for the alleged traffic violation.

7. ARLENYS MARTÍNEZ VALDÉS did not commit any criminal offense, was not charged with any crime, and did not engage in any unlawful conduct during the traffic stop.

8. Despite the absence of criminal conduct, ARLENYS MARTÍNEZ VALDÉS was taken into immigration custody by Immigration and Customs Enforcement (ICE).

9. Since her arrest on September 19, 2025, ARLENYS MARTÍNEZ VALDÉS has remained continuously detained at the Karnes County Immigration Processing Center in Karnes City, Texas.

10. ARLENYS MARTÍNEZ VALDÉS is currently housed in 



11. ARLENYS MARTÍNEZ VALDÉS has a final immigration hearing scheduled for January 2026, and her immigration proceedings remain pending.

12. There is no indication that ARLENYS MARTÍNEZ VALDÉS's removal from the United States is imminent.

13. Prior to her detention, ARLENYS MARTÍNEZ VALDÉS lived in the community, complied with all immigration obligations, and posed no danger to the community and no risk of flight.

14. ARLENYS MARTÍNEZ VALDÉS's continued detention stems solely from civil immigration enforcement and not from any criminal conduct.

IV. SERIOUS MEDICAL CONDITION (Celiac Disease)

15. ARLENYS MARTÍNEZ VALDÉS suffers from CELIAC DISEASE, a chronic autoimmune medical condition that requires a strict, lifelong gluten-free diet in order to prevent serious and potentially irreversible health complications.

16. Celiac disease is not a minor condition or a dietary preference. When individuals with celiac disease consume gluten, their immune system attacks the small intestine, causing inflammation, intestinal damage, malabsorption of nutrients, anemia, chronic gastrointestinal distress, and progressive deterioration of health.

17. The only effective treatment for celiac disease is a carefully controlled and strictly gluten-free diet. Even small amounts of gluten can trigger severe symptoms and long-term intestinal damage.

18. Immigration detention facilities are not designed or equipped to reliably provide, monitor, or guarantee specialized medical diets required for autoimmune conditions such as celiac disease.

19. Continued detention of ARLENYS MARTÍNEZ VALDÉS places her at serious and immediate risk of physical harm. The stress inherent in detention, combined with the lack of consistent dietary

control, significantly increases the likelihood of autoimmune flare-ups, malnutrition, and long-term intestinal injury.

20. Detention under these circumstances is not merely inconvenient; it is medically dangerous. Civil immigration detention may not be administered in a manner that endangers a person's health or exposes them to serious medical risk.

21. Because ARLENYS MARTÍNEZ VALDÉS's medical condition requires constant dietary supervision that cannot be adequately ensured in detention, continued confinement violates basic principles of due process.

22. These serious medical and humanitarian circumstances strongly weigh in favor of ARLENYS MARTÍNEZ VALDÉS's immediate release from detention or, at minimum, the imposition of less restrictive alternatives to detention.

V. LEGAL ARGUMENT

Immigration detention is civil in nature and may not be punitive. The Due Process Clause of the Fifth Amendment prohibits the federal government from depriving any person of liberty without due process of law, and this constitutional protection applies to all persons within the United States, including noncitizens.

When civil detention becomes excessive, prolonged, or disconnected from its legitimate regulatory purpose, it violates fundamental principles of due process.

In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court held that immigration detention becomes unconstitutional when removal is not reasonably foreseeable, because continued

confinement under such circumstances bears no reasonable relation to its purported civil purpose. Detention may not be used as a form of punishment or as a means of indefinite confinement.

In *Demore v. Kim*, 538 U.S. 510 (2003), the Supreme Court upheld mandatory detention only for a narrow category of noncitizens with certain criminal convictions and only for brief and finite periods. Those circumstances are clearly not present in the case of my daughter, ARLENYS MARTÍNEZ VALDÉS, who is not a criminal and who was awaiting the opportunity to lawfully present and litigate her asylum case while living in the community, not in detention.

The Supreme Court further confirmed in *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018), that habeas corpus remains the proper procedural mechanism through which individuals may challenge unlawful and unconstitutional immigration detention.

Consistent with these principles, the Fifth Circuit has recognized that prolonged civil immigration detention must remain reasonably related to its regulatory purpose and may not operate as punishment. See *Andrade v. Gonzales*, 459 F.3d 538, 543 (5th Cir. 2006).

I respectfully submit that my daughter has been subjected to unnecessary and avoidable punishment. Her detention could have been avoided, and she could have been preparing her legal defense in the community. Instead, she has been forced to prepare her case while detained, under severe limitations that impair her ability to meaningfully participate in her own defense.

Moreover, the Supreme Court has made clear that even civil detention must be narrowly tailored to serve a compelling governmental interest and may not function as punishment. *United States v. Salerno*, 481 U.S. 739, 747 (1987).

International principles prohibiting arbitrary detention, including those reflected in the International Covenant on Civil and Political Rights, further reinforce the constitutional mandate that detention not be excessive, unjustified, or arbitrary.

My daughter's detention has been arbitrary. She committed no violation. She was not the driver of the vehicle involved in the traffic stop, and she had no way of knowing that the vehicle had a defective light. The responsibility for the traffic violation did not lie with her.

When these legal principles are applied to the facts of my daughter's case, it becomes clear that her continued detention violates due process. This case does not involve a criminal noncitizen. There is no risk of flight and no threat to public safety.

My daughter cannot flee. She has me, her mother, as a lawful permanent resident of the United States, willing and able to supervise and care for her.

At the time of her arrest, ARLENYS MARTÍNEZ VALDÉS was lawfully present in the United States, with a properly filed asylum application pending and a valid employment authorization issued by the federal government.

These circumstances demonstrate that the detention at issue is no longer regulatory in nature but has become punitive in effect. Continued detention under these conditions is incompatible with the Due Process Clause of the Fifth Amendment, particularly given ARLENYS MARTÍNEZ VALDÉS's serious medical condition, which places her health at substantial risk while detained.

VI. NO FLIGHT RISK & RELEASE PLAN

ARLENYS MARTÍNEZ VALDÉS does not pose a risk of flight and does not present any danger to the community. Prior to her detention, she lived openly in the community, complied with all immigration obligations, and was previously released under a Form I-220A without incident.

She has demonstrated consistent compliance with immigration requirements, including the filing of a properly submitted asylum application and maintaining valid employment authorization issued by the federal government.

If released, ARLENYS MARTÍNEZ VALDÉS will reside at a verified and stable address located at [REDACTED] She will live with her friend, DAIRELYS PAZ RIVERA, due to the location of her lawful employment in Texas, which requires her to remain in the area.

DAIRELYS PAZ RIVERA has agreed to provide housing and support and can be contacted at [REDACTED]

ARLENYS MARTÍNEZ VALDÉS has a final immigration hearing scheduled for January 2026, which provides a strong incentive for her to appear and comply with all future immigration proceedings.

Additionally, ARLENYS MARTÍNEZ VALDÉS's mother, DIANYS VALDÉS CRUSELLAS, a lawful permanent resident of the United States, is willing and able to supervise her daughter and ensure compliance with all conditions imposed by the Court or immigration authorities.

Less restrictive alternatives to detention are available and appropriate in this case, including release under supervision, reporting requirements, or any other conditions the Court deems reasonable. Continued detention is unnecessary to ensure her appearance at future proceedings and serves no legitimate governmental purpose.

VII. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Honorable Court grant the following relief:

- A. Issue a writ of habeas corpus ordering the immediate release of ARLENYS MARTÍNEZ VALDÉS from immigration detention.
- B. In the alternative, order her release under reasonable and less restrictive conditions of supervision, including reporting requirements or any other conditions the Court deems appropriate.
- C. Order any other relief the Court deems just, proper, and equitable under the circumstances.

Respectfully submitted,

I, DIANYS VALDÉS CRUSELLAS, declare under penalty of perjury under the laws of the United States of America that I am the mother of ARLENYS MARTÍNEZ VALDÉS and the Petitioner in this action, acting as next friend.

I further declare that I have read the foregoing Petition for Writ of Habeas Corpus and that the facts stated therein are true and correct to the best of my knowledge, information, and belief.

Executed on December 12, 2025.

DIANYS VALDÉS CRUSELLAS



Lawful Permanent Resident

