

FILED

JAN 29 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY
DEPUTY CLERK

ARLENYS MARTÍNEZ VALDÉS
Karnes County Immigration Processing Center
Attn: Detainee Mail
409 FM 1144
Karnes City, TX 78118

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION**

ARLENYS MARTÍNEZ VALDÉS,

§ A#

Petitioner,

SA 26CA0031

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,**

§
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§
§
§
§

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, ARLENYS MARTÍNEZ VALDÉS () hereby certify that 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. Karnes County Immigration Processing Center
Attn: Facility Administrator
409 FM 1144
Karnes City, TX 78118
2. United States District Court
Attn: Clerk of Court
Western District of Texas
655 E. Cesar E. Chavez Blvd
San Antonio, TX 78206
3. United States Attorney's Office
Western District of Texas
601 NW Loop 410, Suite 600
San Antonio, TX 78216
4. U.S. Immigration and Customs Enforcement (ICE)
Enforcement and Removal Operations (ERO)
San Antonio Field Office
1777 NE Loop 410, Suite 1500
San Antonio, TX 78217

Signature: _____

ARLENYS MARTÍNEZ VALDÉS



Date: 01/26/2026

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**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

I. INTRODUCTION

My name is **ARLENYS MARTÍNEZ VALDÉS** (A# ). I am a Cuban national who was previously released under a **Form I-220A** on **August 12, 2021**. After my release, I complied with all immigration obligations, filed an application for asylum, and obtained authorization to work legally in the United States.

Despite my compliance, I was arrested again on **September 19, 2025**, without having committed any crime, during a minor traffic stop in which I was not the driver of the vehicle.

I am currently detained at the **Karnes County Immigration Processing Center** in Karnes City, Texas, housed in **Willow Dorm, Court 215, Bed No. 3**.

I respectfully file this Petition for a Writ of Habeas Corpus under **28 U.S.C. § 2241** because my continued immigration detention is unlawful, excessive, and unconstitutional, and because it places my health and well-being at serious risk.

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.

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 **Western District of Texas, San Antonio Division**, because I am 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 my immediate custodian.

III. STATEMENT OF FACTS

1. I am **ARLENYS MARTÍNEZ VALDÉS**, a Cuban national born on , 2000, and a native of **Pinar del Río, Cuba**.
2. I was previously released from immigration custody under a **Form I-220A** on **August 12, 2021**, and I complied with all conditions imposed by immigration authorities.
3. After my release, I remained in the United States, complied with all immigration requirements, filed an application for asylum, and obtained authorization to work legally.
4. My asylum application was later denied, and I currently have a pending appeal before the **Board of Immigration Appeals (“BIA”)**. I will attach proof of my pending BIA appeal, including the receipt/confirmation, as an exhibit to this Petition.
5. On **September 19, 2025**, I was arrested following a minor traffic stop conducted by a local sheriff.

6. At the time of the stop, I was a passenger in the vehicle, and I was not the driver.
7. The traffic stop was based on a minor equipment violation involving a defective light. I was not responsible for the alleged traffic violation.
8. I did not commit any criminal offense, I was not charged with any crime, and I did not engage in any unlawful conduct during the traffic stop.
9. Despite the absence of criminal conduct, I was taken into immigration custody by U.S. Immigration and Customs Enforcement ("ICE").
10. Since my arrest on **September 19, 2025**, I have remained continuously detained at the **Karnes County Immigration Processing Center** in Karnes City, Texas.
11. I am currently housed in **Willow Dorm, Court 215, Bed No. 3**.
12. I have a final immigration hearing scheduled for **January 2026**, and my immigration proceedings remain pending.
13. There is no indication that my removal from the United States is imminent.
14. Prior to my detention, I lived in the community, complied with all immigration obligations, and posed no danger to the community and no risk of flight.
15. My continued detention stems solely from civil immigration enforcement and not from any criminal conduct.

IV. SERIOUS MEDICAL CONDITIONS (Celiac Disease and Congenital Myopia)

16. I suffer 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.
17. 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.
18. 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.
19. 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.
20. In addition to my celiac disease, I am currently experiencing serious vision problems due to **myopia**, which is a **congenital condition that I have had since birth**. My ability to see clearly has significantly worsened while detained. I have submitted **three (3) written medical requests** asking to be evaluated by a doctor because I can barely see and I am not seeing well. Despite these repeated requests, I have **not yet been evaluated by a doctor**, and my condition remains untreated.
21. I will attach copies of these **three medical requests** as exhibits to this Petition to demonstrate my efforts to obtain medical care and the facility's failure to provide timely evaluation and treatment.

22. My continued detention places me at serious and immediate risk of physical harm. The stress inherent in detention, combined with the lack of consistent dietary control and the lack of proper medical attention, significantly increases the likelihood of autoimmune flare-ups, malnutrition, and long-term intestinal injury.
23. 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.
24. I will also attach my **detention facility medical card / medical intake card**, which reflects the **congenital medical conditions I have had since birth** and confirms my documented health issues while in custody.
25. Because my medical conditions require consistent monitoring and care that cannot be adequately ensured in detention, continued confinement violates basic principles of due process.
26. These serious medical and humanitarian circumstances strongly weigh in favor of my 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 not present in my case, because I am not a criminal and I was awaiting the opportunity to lawfully present and litigate my 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 I have been subjected to unnecessary and avoidable punishment. My detention could have been avoided, and I could have been preparing my legal defense in the

community. Instead, I have been forced to prepare my case while detained, under severe limitations that impair my ability to meaningfully participate in my 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 detention has been arbitrary. I committed no violation. I was not the driver of the vehicle involved in the traffic stop, and I had no way of knowing that the vehicle had a defective light. The responsibility for the traffic violation did not lie with me.

When these legal principles are applied to the facts of my case, it becomes clear that my 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.

At the time of my arrest, I 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 my serious medical conditions, which place my health at substantial risk while detained.

VI. NO FLIGHT RISK & RELEASE PLAN

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

I have 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, I will reside at a verified and stable address located at **670 Louis Henna Blvd, Apt. 1901, Round Rock, Texas 78664**. I will live with my friend, **DAIRELYS PAZ RIVERA**, due to the location of my lawful employment in Texas, which requires me to remain in the area.

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 my appearance at future proceedings and serves no legitimate governmental purpose.

VII. PRAYER FOR RELIEF

WHEREFORE, I respectfully request that this Honorable Court grant the following relief:

- A. Issue a writ of habeas corpus ordering my immediate release from immigration detention.
- B. In the alternative, order my 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.

VERIFICATION

I, **ARLENYS MARTÍNEZ VALDÉS**, declare under penalty of perjury under the laws of the United States of America that I am the Petitioner in this action.

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.

Date: 01/26/2026

Signature: 

ARLENYS MARTÍNEZ VALDÉS

A# 

Currently detained at: Karnes County Immigration Processing Center

Karnes City, Texas