

Please direct and transmit all communications, notices, and correspondence related to this matter to the designated address and contact information as follows (this information is also provided in habeas petition): 7201 13th Avenue, Brooklyn, New York 11228, telephone (646) 740-8866.

Date: 01/28/2026

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

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

ILIA KARTVELISHVILI, A 

Petitioner, *Pro se*

v.

ERO EL PASO CAMP EAST MONTANA

Respondent.

Case No.: EP-26-CV-38-KC

PETITIONER'S RESPONSE TO THE COURT'S ORDER DATED JANUARY 12, 2026
NOW COMES the Petitioner, Ilia Kartvelishvili, through undersigned counsel, and respectfully submits this Response to the Court's Order dated January 12, 2026. In accordance with the Court's directive, Petitioner provides the following information:

1. Country of Citizenship

Petitioner is a citizen of Georgia.

2. Date of Last Entry into the United States

Petitioner last entered the United States at an unknown location on or about 2021-12-05.

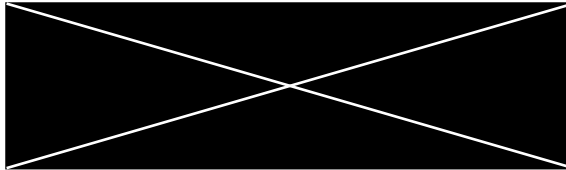
3. Date Taken into Immigration Custody and Detention

Petitioner was taken into immigration custody on August 18, 2025.

Petitioner hereby corrects any previously provided date. A copy of the Notice to Appear (NTA) reflecting this information is submitted concurrently as supporting documentation.

4. Residence in the United States From Last Entry Until Detention

From the date of his last entry into the United States until his detention, Petitioner resided at the following addresses:

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5. Prior Immigration Detention and Release

Yes. On or about **December 4, 2021**, Petitioner was apprehended after entering the United States via the **Mexico–United States border**.

Petitioner was subsequently released by immigration authorities on **January 5, 2022**, without parole.

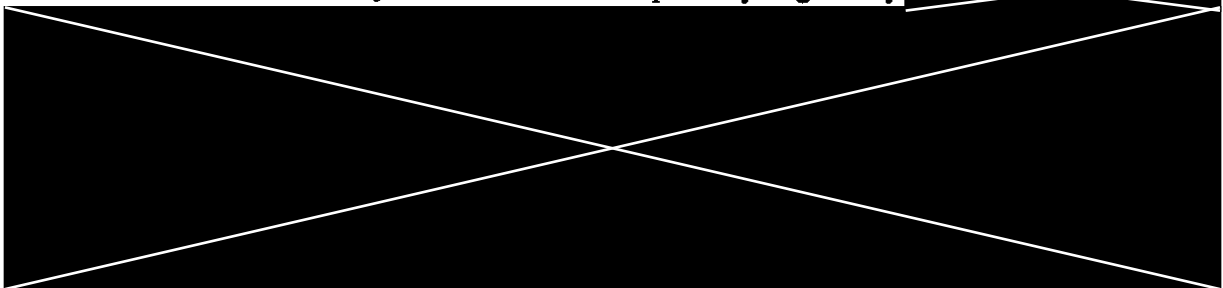
6. Prior Petition for Writ of Habeas Corpus

Petitioner has not previously filed a petition for writ of habeas corpus.

The Petitioner has been continuously detained since **August 18, 2025**, and remains in custody as of **January 2026**, resulting in **more than five months of civil immigration detention**. During this period, Petitioner has filed multiple bond requests, all of which were denied on jurisdictional grounds, leaving him without any meaningful opportunity for release. This length of detention is **prolonged**.

The Petitioner Ilia Kartvelishvili is a citizen of Georgia who fled his country due to 

 As detailed in his sworn testimony, the Petitioner was repeatedly targeted by 



After entering the United States, Petitioner pursued protection through the asylum process. On August 18, 2025, while appearing for a USCIS interview, Petitioner was unexpectedly taken into immigration custody without meaningful access to counsel, despite requesting legal assistance. He was transferred between multiple detention facilities and ultimately confined in the El Paso Service Processing Center.

Since his detention, the Petitioner has been held for an extended period without a bond hearing. He has endured harsh and unsafe conditions of confinement, including lack of adequate medical care, prolonged isolation, food deprivation, exposure to violence from other detainees, verbal abuse, and significant deterioration of his mental and physical health. He has repeatedly sought protection, medical attention, and transfer to safer housing, with delayed or insufficient responses from detention authorities.

WHEREFORE, Petitioner respectfully submits this Response in compliance with the Court's Order and stands ready to provide any additional information the Court may require.

Respectfully submitted,



Dated: January 28, 2026

LIST OF EXHIBITS

Exhibit A – Affidavit Concerning Facts Supporting Asylum Claim

Affidavit of the Petitioner detailing factual background of the asylum claim, including political opinion, past persecution, threats, mistreatment, and fear of return to the country of origin.

Exhibit B – Affidavit Concerning Facts of Detention and Conditions of Confinement

Affidavit describing the circumstances of the Petitioner's immigration detention, including the date of custody, location of detention, duration, and conditions of confinement.

Exhibit C – Sponsor Documentation

Documentation submitted in support of the Petitioner's request for release, including evidence of financial sponsorship, proof of residence, identity documents, and any affidavits or declarations from the sponsor.

Exhibit D – DHS Notice to Appear