

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

FILED

JAN 05 2026

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

YANEXIS CABALLERO RAMOS,
as Next Friend of ZONIA RAMOS SÁNCHEZ,
Petitioner,

v.

Civil Action No. SA26CA0055 **OG**

UNITED STATES DEPARTMENT OF HOMELAND SECURITY;
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE);
WARDEN, KARNES COUNTY IMMIGRATION PROCESSING CENTER,
Respondents.

ULTRA-EXTENSIVE PETITION FOR WRIT OF HABEAS CORPUS
(28 U.S.C. § 2241)

PRELIMINARY STATEMENT

This is an extraordinary case of unlawful, prolonged, and unconstitutional civil detention of an elderly Cuban national with severe psychological trauma and no criminal history. The continued detention of Zonia Ramos Sánchez serves no legitimate governmental interest and constitutes punishment in violation of the United States Constitution.

INTRODUCTION

Petitioner Yanexis Caballero Ramos, acting as Next Friend of her mother, Zonia Ramos Sánchez (“Petitioner” or “Detainee”), respectfully petitions this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241. Petitioner is currently detained at the Karnes County Immigration Processing Center under the authority of ICE following a warrantless arrest unsupported by judicial oversight.

This detention violates the Fourth Amendment, the Fifth Amendment Due Process Clause, and fundamental principles of liberty repeatedly affirmed by the Supreme Court of the United States.

JURISDICTION AND VENUE

1. Jurisdiction is proper under 28 U.S.C. §§ 2241 and 1331.
2. This Court has authority to grant immediate release where detention violates constitutional limits.
3. Venue is proper in the Southern District of Texas because Petitioner is confined within this District.

PARTIES

DETAINEE:

Name: Zonia Ramos Sánchez

A-Number: [REDACTED]

Date of Birth: [REDACTED] 1966

Nationality: Cuban

Date of Entry: October 14, 2022

Date of Detention: October 8, 2025

Facility: Karnes County Immigration Processing Center

Social Security Number: [REDACTED]

NEXT FRIEND:

Name: Yanexis Caballero Ramos

A-Number: [REDACTED]

Date of Birth: [REDACTED]

Nationality: Cuban

Address: [REDACTED] Pflugerville, TX 78660

Phone: (512) 689-0230

Email: yanexiscaballeroramos22@gmail.com

NEXT FRIEND STANDING

Under *Whitmore v. Arkansas*, 495 U.S. 149 (1990), Next Friend standing exists where the detainee is unable to litigate due to confinement or incapacity and the representative

has a significant relationship and dedication to the detainee's best interests. Both requirements are satisfied here.

STATEMENT OF FACTS

Ms. Ramos Sánchez is a 59-year-old Cuban national who entered the United States seeking safety and stability. She was arrested by ICE on October 8, 2025, without a judicial warrant, probable cause determination, or exigent circumstances.

She has no criminal history in Cuba or the United States. Prior to detention, she was employed, paid taxes, and served as the primary caregiver for her six-year-old granddaughter.

Ms. Ramos Sánchez suffers from severe anxiety and depression resulting from profound trauma, including witnessing her sister commit self-immolation in Cuba. Since detention, her condition has markedly deteriorated, including substantial weight loss, insomnia, emotional distress, and psychological decompensation.

The detention has caused severe collateral harm to her family. Her granddaughter has experienced emotional instability and academic decline due to the sudden loss of her grandmother's daily care.

LEGAL STANDARD

Habeas corpus serves as a vital check against executive detention that exceeds constitutional limits. Civil immigration detention is permissible only when reasonably related to legitimate governmental purposes and when accompanied by adequate procedural safeguards.

ARGUMENT

I. THE WARRANTLESS ARREST VIOLATES THE FOURTH AMENDMENT

The Fourth Amendment requires that arrests be supported by a warrant issued by a neutral magistrate. Administrative ICE warrants do not satisfy constitutional standards.

See *Almeida-Sanchez v. United States*, 413 U.S. 266 (1973);

Morales v. Chadbourne, 793 F.3d 208 (1st Cir. 2015);

Arizona v. United States, 567 U.S. 387 (2012).

II. PROLONGED CIVIL DETENTION WITHOUT INDIVIDUALIZED REVIEW VIOLATES DUE PROCESS

Detention that becomes excessive or indefinite violates substantive due process.

Zadvydas v. Davis, 533 U.S. 678 (2001);

Demore v. Kim, 538 U.S. 510 (2003);

Jennings v. Rodriguez, 583 U.S. 830 (2018).

Here, no meaningful bond hearing has occurred, rendering detention arbitrary.

III. FAILURE TO PROVIDE A BOND HEARING VIOLATES PROCEDURAL DUE PROCESS

Due process requires a hearing where the government bears the burden to justify detention by clear and convincing evidence.

Rodriguez v. Robbins, 715 F.3d 1127 (9th Cir.);

Hernandez v. Sessions, 872 F.3d 976 (9th Cir.).

IV. DETENTION OF A MEDICALLY AND PSYCHOLOGICALLY VULNERABLE DETAINEE IS UNCONSTITUTIONAL

Government indifference to serious medical needs violates due process.

Estelle v. Gamble, 429 U.S. 97 (1976);

Youngberg v. Romeo, 457 U.S. 307 (1982).

V. FAMILY SEPARATION CAUSES IRREPARABLE CONSTITUTIONAL HARM

The Supreme Court recognizes family integrity as a fundamental liberty interest.

Moore v. City of East Cleveland, 431 U.S. 494 (1977);

Troxel v. Granville, 530 U.S. 57 (2000).

VI. PETITIONER IS NOT A FLIGHT RISK OR DANGER TO THE COMMUNITY

Ms. Ramos Sánchez has deep family ties, stable housing, employment prospects, and no criminal record. Continued detention is punitive, not regulatory.

VII. DETENTION VIOLATES THE EXCESSIVE PUNISHMENT PRINCIPLE OF CIVIL CONFINEMENT

Civil detention may not be punitive in nature.

Bell v. Wolfish, 441 U.S. 520 (1979).

REQUEST FOR RELIEF

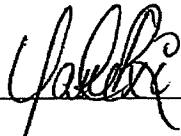
WHEREFORE, Petitioner respectfully requests that this Court:

- A. Grant the Petition for Writ of Habeas Corpus;
- B. Order the immediate release of Zonia Ramos Sánchez;
- C. Alternatively, order a prompt bond hearing with the burden on the government;
- D. Grant any other relief the Court deems just and proper.

DECLARATION UNDER PENALTY OF PERJURY

I, Yanexis Caballero Ramos, declare under penalty of perjury that the foregoing is true and correct.

DATED: 12/29/2025



Yanexis Caballero Ramos

Next Friend of Zonia Ramos Sánchez

Phone: (512) 689-0230

Email: yanexiscaballeroramos22@gmail.com

DECLARATION OF NEXT FRIEND

(IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS)

I, Yanexis Caballero Ramos, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 as follows:

1. I am the biological daughter of Zonia Ramos Sánchez, A-Number , who is currently detained at the Karnes County Immigration Processing Center.
2. I submit this declaration in my capacity as Next Friend in support of my mother's Petition for Writ of Habeas Corpus filed before the United States District Court for the Southern District of Texas, San Antonio Division.
3. My mother is a Cuban national, a devoted mother and grandmother, and a person of excellent moral character. She has no criminal record in Cuba or in the United States and has always been a hardworking, honest, and responsible person.
4. My mother was arrested by ICE on October 8, 2025, without a warrant issued by a judge. Since her detention, her physical and emotional condition has significantly deteriorated.
5. My mother suffers from severe anxiety and depression caused by profound trauma she experienced in Cuba, including witnessing her sister set herself on fire. This traumatic event left lasting psychological scars that have worsened during her prolonged detention.
6. Since being detained, my mother has lost a noticeable amount of weight, experiences constant nervousness, insomnia, and emotional distress. During our communications, I have observed a clear decline in her mental and physical health.

7. The detention of my mother has caused severe emotional and practical harm to our family. My six-year-old daughter, who was primarily cared for by her grandmother while I worked, has experienced emotional instability and a decline in her academic performance due to my mother's absence.

8. My mother was employed prior to her detention, and her employer has confirmed that her job will remain available to her upon release due to her excellent work performance and behavior.

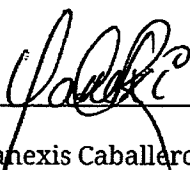
9. Our family is ready and willing to provide housing, financial support, and emotional care to my mother upon her release. She will not become a public charge and poses no danger to the community.

10. My mother has strong family ties in the United States, including myself and her granddaughter, and therefore is not a flight risk.

11. I respectfully ask this Honorable Court to consider the serious humanitarian, medical, and family factors in this case and to order the immediate release of my mother, or alternatively, to grant her a prompt individualized bond hearing.

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

Executed on 12/29/2025



Yanexis Caballero Ramos

Yanexis Caballero Ramos

Next Friend of Zonia Ramos Sánchez

Address:



Pflugerville, TX 78660

Phone: (512) 689-0230

Email: yanexiscaballeroramos22@gmail.com

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CERTIFICATE OF SERVICE
(PROOF OF SERVICE)

I, Yanexis Caballero Ramos, hereby certify that on the date indicated below, I caused a true and correct copy of the following documents to be served:

- Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241
- Declaration of Next Friend (Affidavit)
- All accompanying exhibits

Service was made by depositing the documents in the United States mail, postage prepaid, addressed to the following parties:

1. UNITED STATES ATTORNEY

Southern District of Texas – San Antonio Division

Attn: Civil Process Clerk

601 NW Loop 410, Suite 600

San Antonio, TX 78216

2. U.S. DEPARTMENT OF HOMELAND SECURITY

IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE)

Office of the Principal Legal Advisor (OPLA)

San Antonio Field Office

1777 NE Loop 410, Suite 1500

San Antonio, TX 78217

3. WARDEN

Karnes County Immigration Processing Center

810 FM 1144

Karnes City, TX 78118

4. U.S. DEPARTMENT OF JUSTICE

Civil Division – Office of Immigration Litigation

P.O. Box 868, Ben Franklin Station

Washington, DC 20044

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: 12/29/2025



Yanexis Caballero Ramos

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