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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
ABILENE DIVISION**

**MOTION FOR IMMEDIATE RELEASE**

**IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS  
(28 U.S.C. § 2241)**

Petitioner, ALIESKYS VENEGA SANABRIA (A# XXXXXXXXXX), by and through his Next Friend, ANAYSA DEL SOL LEAL, respectfully moves this Honorable Court for an Order of Immediate Release, or in the alternative, any relief deemed just and proper, based on the following facts and authorities.

**I. FACTUAL BACKGROUND**

Petitioner was arrested on December 31, 2025, while responsibly appearing at a routine ICE check-in. He was taken into custody without a judicial warrant and without probable cause. During the arrest, ICE agents made racially discriminatory and humiliating remarks.

Since his detention at the Bluebonnet Detention Facility, Petitioner has been subjected to inhumane conditions of confinement, including rationing of food and water, provision of spoiled food, denial of hygiene products, psychological harassment, intimidation, and coercion to sign deportation papers.

Petitioner has also suffered serious medical neglect. Despite experiencing high fever and illness, he has been denied adequate medical attention and necessary medication.

**II. LEGAL STANDARD**

Federal courts possess inherent authority under 28 U.S.C. § 2241 to order the immediate release of immigration detainees when detention violates the Constitution or federal law. See *Zadvydas v. Davis*, 533 U.S. 678 (2001).

**III. ARGUMENT**

**A. CONTINUED DETENTION VIOLATES DUE PROCESS**

Prolonged detention without meaningful review violates the Fifth Amendment. Petitioner has demonstrated that he is neither a danger to the community nor a flight risk.

**B. CONDITIONS OF CONFINEMENT REQUIRE IMMEDIATE RELEASE**

Conditions amounting to punishment of a civil detainee are unconstitutional. *Bell v. Wolfish*, 441 U.S. 520 (1979). Medical neglect alone warrants release.

**C. COERCION AND RETALIATION**

Threats and coercion to force removal signatures violate due process. *Orantes-Hernandez v. Thornburgh*, 919 F.2d 549 (9th Cir. 1990).

**D. HUMANITARIAN AND EQUITABLE FACTORS**

Petitioner has strong family ties, no serious criminal record, and faces severe harm if returned to Cuba.

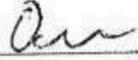
**IV. RELIEF REQUESTED**

WHEREFORE, Petitioner respectfully requests that this Court:

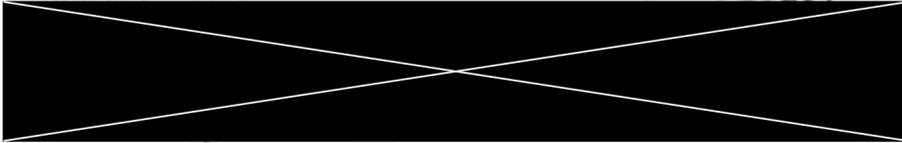
1. Order the immediate release of Petitioner from ICE custody;
2. Alternatively, order an expedited individualized bond hearing;
3. Enjoin Respondents from further coercion or retaliation;
4. Grant any other relief this Court deems just and proper.

**V. VERIFICATION AND SIGNATURE**

I, Anaysa del Sol Leal, declare under penalty of perjury that the foregoing is true and correct.



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Anaysa del Sol Leal  
Next Friend for Petitioner



Date: 01/28/2020