

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

6:26-cv-00034

JORGE LUIS SINTI SANGAMA, [REDACTED]
Petitioner,

v.

MERRICK B. GARLAND, Attorney General of the United States;
ALEJANDRO MAYORKAS, Secretary of Homeland Security;
TAE D. JOHNSON, Acting Director, ICE;
WARDEN, Eden Detention Center,

Respondents.

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

Petitioner Jorge Luis Sinti Sangama, a Peruvian national, by and through his domestic partner and Next Friend, Claudia Requejo Culquiton, respectfully submits this Super Ultra-Extensive Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, challenging his unlawful, warrantless, and unconstitutional civil immigration detention at Eden Detention Center.

I. JURISDICTION AND VENUE

This Court has jurisdiction pursuant to 28 U.S.C. § 2241(c)(3) because Petitioner is in custody in violation of the Constitution and laws of the United States. Venue is proper in the Northern District of Texas, San Angelo Division, as Petitioner is detained within this judicial district. *Rumsfeld v. Padilla*, 542 U.S. 426 (2004).

II. PARTIES

Petitioner: Jorge Luis Sinti Sangama, [REDACTED], born [REDACTED], Peruvian national, detained since December 8, 2025.

Next Friend: Claudia Requejo Culquiton, [REDACTED], born [REDACTED], Peruvian national, domestic partner of Petitioner.

III. NEXT FRIEND STANDING

Next Friend standing is proper under *Whitmore v. Arkansas*, 495 U.S. 149 (1990). Petitioner is physically restrained, lacks meaningful access to the courts, and suffers emotional and psychological harm due to detention. The Next Friend maintains a significant personal relationship and is fully dedicated to Petitioner's best interests.

IV. STATEMENT OF FACTS

Petitioner entered the United States on April 23, 2024. On December 8, 2025, while appearing responsibly at a routine ICE check-in appointment, Petitioner was arrested without a judicial warrant, without probable cause, and without any criminal charges.

Petitioner has no criminal record in the United States or in his country of origin. His arrest occurred solely due to his compliance with ICE supervision, demonstrating that he is neither a flight risk nor a danger to the community.

V. HUMANITARIAN AND EQUITABLE CONSIDERATIONS

Petitioner and his domestic partner have been severely affected by the unjustified arrest and treatment he has endured. Conditions of detention have been degrading

and punitive in nature, despite Petitioner's civil immigration status.

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COUNT I - UNLAWFUL WARRANTLESS ARREST (FOURTH AMENDMENT)

Petitioner's warrantless arrest during a voluntary ICE appointment violates the Fourth Amendment. See *Payton v. New York*, 445 U.S. 573 (1980); *Morales v. Chadbourne*, 793 F.3d 208 (1st Cir. 2015); *Gonzalez v. ICE*, 975 F.3d 788 (9th Cir. 2020).

COUNT II - VIOLATION OF DUE PROCESS (FIFTH AMENDMENT)

Civil immigration detention must bear a reasonable relation to its purpose. *Zadvydas v. Davis*, 533 U.S. 678 (2001). Detention without individualized justification violates substantive and procedural due process.

COUNT III - PUNITIVE CIVIL DETENTION

Civil detention may not be punitive. *Bell v. Wolfish*, 441 U.S. 520 (1979). Conditions at Eden Detention Center transform civil custody into unconstitutional punishment.

COUNT IV - NO FLIGHT RISK AND DANGER TO COMMUNITY

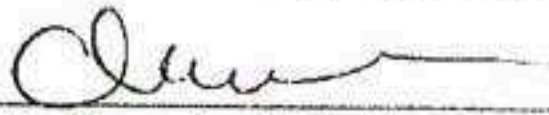
Petitioner voluntarily appeared at ICE appointments, has no criminal history, and maintained employment. Continued detention lacks any legitimate governmental interest.

VII. RELIEF REQUESTED

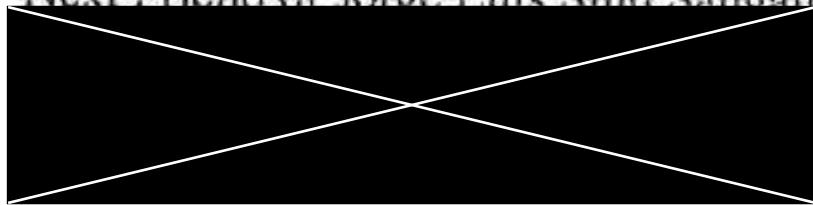
Petitioner respectfully requests that this Court grant the Writ of Habeas Corpus and order his immediate release, or alternatively release under reasonable supervision.

VIII. VERIFICATION

I, Claudia Requejo Culquiton, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.



Claudia Requejo Culquiton
Next Friend of Jorge Luis Sinti Sangoana



UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

JORGE LUIS SINTI SANGAMA, ,
Petitioner,

v.

MERRICK B. GARLAND, Attorney General of the United
States;
ALEJANDRO MAYORKAS, Secretary of Homeland
Security;
TAE D. JOHNSON, Acting Director, ICE;
WARDEN, Eden Detention Center,

Respondents.

MOTION FOR IMMEDIATE RELEASE PENDING HABEAS REVIEW

COMES NOW Petitioner Jorge Luis Sinti Sangama, by and
through his domestic partner and
Next Friend, Claudia Requejo Culquiton, and respectfully
moves this Honorable Court for an
Order of Immediate Release pending resolution of the
pending Petition for Writ of Habeas
Corpus pursuant to 28 U.S.C. § 2241.

I. INTRODUCTION

Petitioner is currently subjected to unlawful civil
immigration detention following a
warrantless arrest during a routine ICE check-in, despite
having no criminal history,
no flight risk, and no danger to the community. Continued
detention serves no legitimate
governmental purpose and violates the Constitution of the
United States.

II. LEGAL STANDARD

Federal courts possess inherent authority to order the
immediate release of a detainee
where detention is unconstitutional or where extraordinary

circumstances warrant such

relief. See *Zadvydas v. Davis*, 533 U.S. 678 (2001), *Maple v. Reno*, 241 F.3d 221 (2d Cir. 2001).

III. ARGUMENT

A. The Arrest Was Warrantless and Unconstitutional
Petitioner was arrested without a judicial warrant while complying with ICE supervision, in violation of the Fourth Amendment.

B. Continued Detention Violates Due Process
Civil detention must be reasonably related to its purpose. Petitioner's prolonged detention without individualized justification violates substantive and procedural due process.

C. No Flight Risk or Danger
Petitioner voluntarily appeared at ICE appointments, has stable community ties, and no criminal history. There is no basis for continued detention.

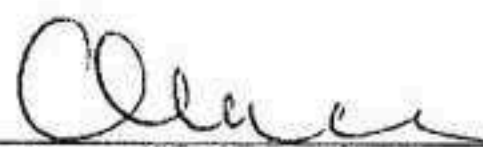
IV. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Court:

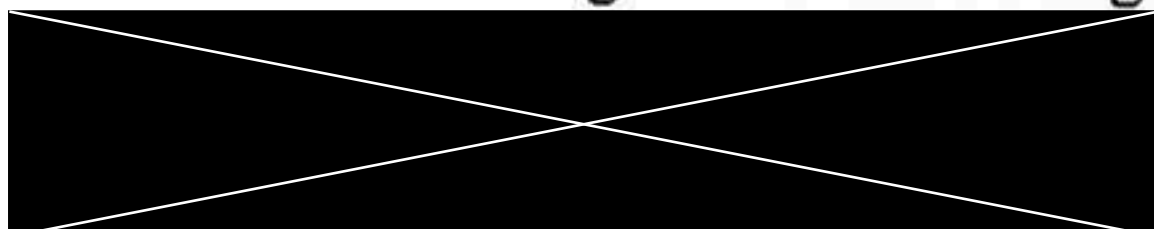
1. Order the immediate release of Petitioner from ICE custody;
2. Alternatively, order release under reasonable conditions of supervision;
3. Grant any further relief this Court deems just and proper.

V. VERIFICATION

I, Claudia Requejo Culquiton, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.



Claudia Requejo Culquiton
Next Friend of Jorge Luis Sinti Sangama



**DECLARATION OF NEXT FRIEND
UNDER PENALTY OF PERJURY
(28 U.S.C. § 1746)**

I, Claudia Requejo Culquiton, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the following statements are true and correct to the best of my knowledge and belief:

1. I am the domestic partner of Jorge Luis Sinti Sangama, ~~XXXXXXXXXX~~, a Peruvian national currently detained at Eden Detention Center under the custody of Immigration and Customs Enforcement (ICE).

2. I submit this declaration as Next Friend because my partner is currently detained, physically restrained, has limited access to legal materials and the courts, and is suffering emotional and psychological distress as a result of his detention.

3. On December 8, 2025, my partner was arrested while appearing responsibly and voluntarily at his regular ICE check-in appointment. He was arrested without a judicial warrant, without criminal charges, and without probable cause.

4. My partner has no criminal record in the United States or in his country of origin. He has never been arrested, charged, or convicted of any crime.

5. The arrest and detention of my partner have caused severe emotional, psychological, and financial hardship to both of us. The treatment he has endured has been unjust, degrading, and deeply traumatic.

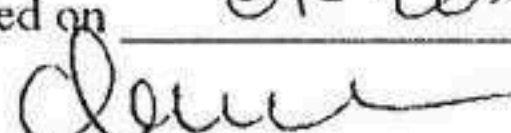
6. Prior to his detention, my partner was lawfully employed and financially self-sufficient. If released, he will immediately return to work and continue supporting himself, demonstrating that he is not and will not become a public charge.

7. My partner is not a flight risk. He voluntarily appeared at all ICE appointments and has always complied with immigration supervision requirements.

8. My partner is not a danger to the community. He has no criminal history, has always been respectful of the law, and has conducted himself as a peaceful and responsible member of society.

9. I respectfully request that this Honorable Court grant the Petition for Writ of Habeas Corpus and order my partner's immediate release, or alternatively his release under reasonable conditions.

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

Executed on 01-20-2026


Claudia Requejo Culquiton
Next Friend of Jorge Luis Sinti Sangama

~~XXXXXXXXXX~~

Address ~~XXXXXXXXXX~~
~~XXXXXXXXXX~~

PROOF OF SERVICE

I, Claudia Requejo Culquiton, declare under penalty of perjury that on the date indicated below, I served a true and correct copy of the following documents:

- Petition for Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241
- Declaration of Next Friend
- All attached Exhibits (if any)

by depositing said documents in the United States Mail, first-class postage prepaid, addressed to the following:

1. CLERK OF COURT

Clerk of Court
United States District Court
Northern District of Texas – San Angelo Division
United States Courthouse
501 West 10th Street, Room 218
Austin, TX 78701

2. UNITED STATES ATTORNEY – NORTHERN DISTRICT OF TEXAS

Office of the United States Attorney
Northern District of Texas
1100 Commerce Street, Third Floor
Dallas, TX 75242

3. DEPARTMENT OF HOMELAND SECURITY / ICE (OPLA)

Office of the Principal Legal Advisor (OPLA)
U.S. Immigration and Customs Enforcement
ICE OPLA Dallas Field Office
1100 Commerce Street, 12th Floor
Dallas, TX 75242

4. ATTORNEY GENERAL OF THE UNITED STATES

Merrick B. Garland
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

5. SECRETARY OF HOMELAND SECURITY

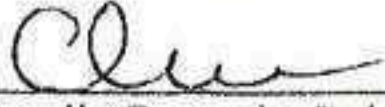
Alejandro Mayorkas
Secretary, Department of Homeland Security
245 Murray Lane SW
Washington, DC 20528

6. WARDEN – DETENTION FACILITY

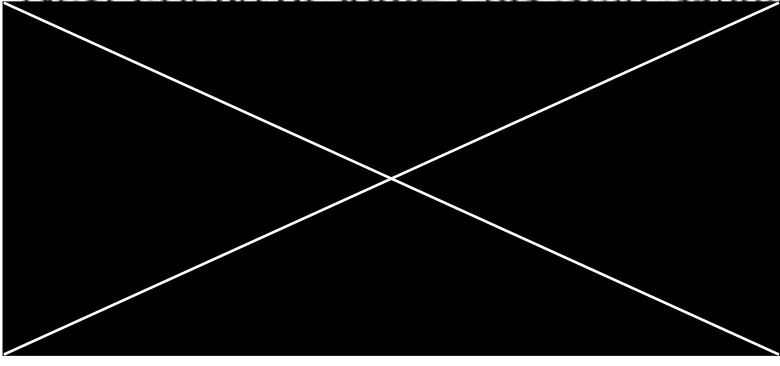
Warden
Eden Detention Center
2600 FM 2059
Eden, TX 76837

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

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Executed on 01-26-2026



Claudia Requejo Culquion
Next Friend of Jorge Luis Sinti Sanguama



LETTER OF SUPPORT / GOOD MORAL CHARACTER

To Whom It May Concern,

I am writing this letter with the utmost respect to provide my professional support for Jorge Luis Sinti Sangama, who worked under my supervision at our workplace.

Throughout the time Jorge was employed with us, he consistently demonstrated a high level of professionalism, responsibility, and respect. He approached his duties with seriousness and commitment, complied with workplace policies, and maintained a positive and cooperative attitude with both supervisors and coworkers.

Jorge proved to be a reliable and trustworthy employee who could be depended upon to complete his tasks correctly and on time. He handled his responsibilities calmly, even in demanding situations, and demonstrated strong self-control and maturity in his interactions. At no time did he engage in disruptive, aggressive, or inappropriate behavior.

In addition to his work ethic, Jorge displayed strong personal character. He treated others with courtesy, followed instructions carefully, and showed a genuine willingness to contribute positively to the workplace environment. His conduct reflected stability, respect for authority, and a sincere desire to work honestly and live peacefully.

Based on my direct experience supervising Jorge, I firmly believe that he is a law-abiding, peaceful, and hardworking individual who does not pose any risk to the community. He consistently acted in a manner that upheld the values of responsibility and respect expected in a professional setting.

For these reasons, I respectfully support Jorge's request to be allowed to continue his legal process while in freedom. I believe he deserves the opportunity to do so while remaining an active, productive, and positive member of society.

Thank you for your time and consideration.

Respectfully,

Date: December 23, 2025

Name: Christopher Barnes

Signature:



LETTER OF SUPPORT / GOOD MORAL CHARACTER

To Whom It May Concern,

I am writing this letter with respect to express my full support for Jorge Luis Sinti Sangama, whom I know as a brother from our church community.

During the time I have had the opportunity to know Jorge, I have always known him to be a respectful, calm, and values-driven individual. His behavior both inside and outside the church has consistently been appropriate, maintaining a peaceful, supportive, and respectful attitude toward others at all times.


I firmly believe that Jorge is a good person who does not represent any danger to society and deserves the opportunity to continue his legal process while remaining at liberty.

Thank you for your time and consideration.

Respectfully,

Date: December 23, 2024

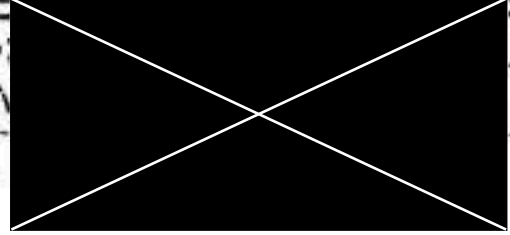
Name: Sara Aguilar

Signature: 

U.S. Department of Homeland Security

Order of Release on Recognizance

File No
Date: /
Event



Name: JORGE LUIS SINTI SANGAMA

You have been arrested and placed in removal proceedings. In accordance with section 236 of the Immigration and Nationality Act and the applicable provisions of Title 8 of the Code of Federal Regulations, you are being released on your own recognizance provided you comply with the following conditions:

You must report for any hearing or interview as directed by the Department of Homeland Security or the Executive Office for Immigration Review.

You must surrender for removal from the United States if so ordered.

You must report in (W/M/F) (person) to AS INDICATED ON THE ATTACHED OREC G-54 (Name and Title of Case Officer) at (Location of DHS Office) on (Day of each week or month) at (Time)

If you are allowed to report in writing, the report must contain your name, alien registration number, current address, place of employment, and other pertinent information as required by the officer listed above.

You must not change your place of residence without first securing written permission from the immigration officer listed above.

You must not violate any local, State, or Federal laws or ordinances.

You must assist the Department of Homeland Security in obtaining any necessary travel documents.

Other: employment not authorized

See attached sheet containing other specified conditions (Continue on separate sheet if required)

NOTICE: Failure to comply with the conditions of this order may result in revocation of your release and your arrest and detention by the Department of Homeland Security.

SIANE A JAIN
Date 2024 04 23 13:34:31
0847347372 (TIP)

(Signature of DHS Official)

Acting/Patrol Agent in Charge

(Printed Name and Title of Official)

Alien's Acknowledgment of Conditions of Release on Recognizance

I hereby acknowledge that I have (read) (had interpreted and explained to me in the SPANISH language) and understand the conditions of my release as set forth in this order. I further understand that if I do not comply with these conditions, the Department of Homeland Security may revoke my release without further notice.

RICARDO S CAZARI S
Date 2024 04 23 14:45:06 (S) (S)
0378621074 (BP)

(Signature of Immigration Officer Serving Order)

(Signature of Alien)

04/23/2024

(Date)

Cancellation of Order

I hereby cancel this order of release because: The alien failed to comply with the conditions of release.

The alien was taken into custody for removal.

(Signature of Immigration Officer Canceling Order)

(Date)

DEPARTMENT OF HOMELAND SECURITY
NOTICE OF CUSTODY DETERMINATION

Alien's Name: JORGE LUIS SINTI SANGAMA A-File Number: [REDACTED]
Date: [REDACTED]
Event ID: [REDACTED] Subject ID: [REDACTED] FIN: [REDACTED]

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that, pending a final administrative determination in your case, you will be:

Detained by the Department of Homeland Security.

Released (check all that apply):

Under bond in the amount of \$ _____

On your own recognizance.

Under other conditions. [Additional document(s) will be provided.]

SIHANE A JAJIN
Date: 2024 04 23 13:34:52 [REDACTED] 1024
[REDACTED] CTIP
Name and Signature of Authorized Officer Date and Time of Custody Determination

Acting/Patrol Agent in Charge El Paso, Texas
Title Office Location/Address

You may request a review of this custody determination by an Immigration Judge.

I acknowledge receipt of this notification, and

I do request an Immigration Judge review of this custody determination.

I do not request an Immigration Judge review of this custody determination.

[Signature] [REDACTED]
Signature of Alien Date

The contents of this notice were read to JORGE LUIS SINTI SANGAMA in the SPANISH language.
(Name of Alien) (Name of Language)

RICARDO S CAZARES
Date: 2024 04 23 14:45:18 [REDACTED] NONE USED
0378621078 CHP Name and Signature of Officer Name or Number of Interpreter (if applicable)

Border Patrol Agent
Title

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED]

FINS #: [REDACTED]

File No: [REDACTED]

DOB: [REDACTED]

Event No: [REDACTED]

In the Matter of:

Respondent: JORGE LUIS SINTI SANGAMA currently residing at:

[REDACTED ADDRESS]

(Number, street, city, state and ZIP code)

(Area code and phone number)

- You are an arriving alien.
- You are an alien present in the United States who has not been admitted or paroled.
- You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of PERU and a citizen of PERU ;
3. You arrived in the United States at or near EL PASO, TX , on or about April 22, 2024 ;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- Section 235(b)(1) order was vacated pursuant to: 8CFR 208.30 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

1100 COMMERCE ST., SUITE 1060 DALLAS TX 75242

(Complete Address of Immigration Court, including Room Number, if any)

on July 22, 2024 at 01:00 PM to show why you should not be removed from the United States based on the

(Date)

(Time)

charge(s) set forth above.

SILVANA JAIN
Date: 2024 04 23 13:35:05
0847347372 CIP

Acting/Patrol Agent in Charge

(Signature and Title of Issuing Officer)

Date: April 23, 2024

El Paso, Texas

(City and State)

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
DALLAS IMMIGRATION COURT

LEAD FILE: [REDACTED]
IN REMOVAL PROCEEDINGS
DATE: Jul 22, 2024

TO:

SINTI SANGAMA, JORGE LUIS
[REDACTED]

RE: [REDACTED] SINTI SANGAMA, JORGE LUIS

Notice of In-Person Hearing

Your case has been scheduled for a MASTER hearing before the immigration court on:

Date: Mar 25, 2025
Time: 1:00 P.M. CT
Court Address: 1100 COMMERCE ST., SUITE 1060
COURTROOM #5, DALLAS, TX 75242

Representation: You may be represented in these proceedings, at no expense to the Government, by an attorney or other representative of your choice who is authorized and qualified to represent persons before an immigration court. If you are represented, your attorney or representative must also appear at your hearing and be ready to proceed with your case. Enclosed and online at <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers> is a list of free legal service providers who may be able to assist you.

Failure to Appear: If you fail to appear at your hearing and the Department of Homeland Security establishes by clear, unequivocal, and convincing evidence that written notice of your hearing was provided and that you are removable, you will be ordered removed from the United States. Exceptions to these rules are only for exceptional circumstances.

Change of Address: The court will send all correspondence, including hearing notices, to you based on the most recent contact information you have provided, and your immigration proceedings can go forward in your absence if you do not appear before the court. If your contact information is missing or is incorrect on the Notice to Appear, you must provide the immigration court with your updated contact information within five days of receipt of that notice so you do not miss important information. Each time your address, telephone number, or email address changes, you must inform the immigration court within five days. To update your contact information with the immigration court, you must complete a Form EOIR-33 either online at <https://respondentaccess.eoir.justice.gov/en/> or by completing the enclosed paper form and mailing it to the immigration court listed above.

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
DALLAS IMMIGRATION COURT

LEAD FILE: [REDACTED]
IN REMOVAL PROCEEDINGS
DATE: Mar 27, 2025

TO: SINTI SANGAMA, JORGE LUIS
[REDACTED]

RE: [REDACTED] SINTI SANGAMA, JORGE LUIS

Notice of In-Person Hearing

Your case has been scheduled for a **INDIVIDUAL** hearing before the immigration court on:

Date: Sep 21, 2028
Time: 1:00 P.M. CT
Court Address: 1100 COMMERCE ST., SUITE 1060
COURTROOM #5, DALLAS, TX 75242

Representation: You may be represented in these proceedings, at no expense to the Government, by an attorney or other representative of your choice who is authorized and qualified to represent persons before an immigration court. If you are represented, your attorney or representative must also appear at your hearing and be ready to proceed with your case. Enclosed and online at <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers> is a list of free legal service providers who may be able to assist you.

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