

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

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VW

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
SAN ANGELO DIVISION

6:26-cv-00049

ÁNGEL DANIEL MORAN QUIROGA,
Petitioner,
v.
U.S. DEPARTMENT OF HOMELAND SECURITY, et al.,
Respondents.

PETITION FOR WRIT OF HABEAS CORPUS AND MEMORANDUM OF LAW

I. INTRODUCTION

This ultra-extensive Petition for Writ of Habeas Corpus is filed pursuant to 28 U.S.C. § 2241 challenging the unlawful, arbitrary, punitive, and constitutionally excessive civil immigration detention of Petitioner Ángel Daniel Moran Quiroga, a Venezuelan national currently detained at the Eden Detention Center in Eden, Texas. This Petition is filed through his uncle and lawful permanent resident, Norberto E. Martínez Romero, acting as Next Friend.

II. JURISDICTION AND VENUE

This Court has jurisdiction under 28 U.S.C. § 2241. Venue is proper in the Northern District of Texas, San Angelo Division, because Petitioner is confined within this district.

III. PARTIES

Petitioner:

Ángel Daniel Moran Quiroga (A# [REDACTED])

DOB [REDACTED]

Nationality: Venezuelan

Date of Entry: August 10, 2021

Date of Detention: September 25, 2025

Detention Facility: Eden Detention Center

702 E Broadway, Eden, TX 76837

Next Friend:

Norberto E. Martínez Romero (A# [REDACTED])

DOB: [REDACTED]

Nationality: Venezuelan

U.S. Lawful Permanent Resident

Address: [REDACTED]

Phone: [REDACTED]

Email: [REDACTED]

IV. STATEMENT OF FACTS

On September 24, 2025, at approximately 5:00 a.m., Petitioner and two coworkers were violently intercepted by masked agents while traveling to work. They were forcibly removed from the vehicle, handcuffed, and placed into vans without explanation or warrants.

Petitioner held Temporary Protected Status (TPS), was an active TPS advocate, and had a pending asylum application, authorizing his employment and Social Security number. Despite lawful presence, he was detained.

Petitioner has been transferred between detention facilities multiple times without justification, interfering with access to counsel.

V. CONDITIONS OF CONFINEMENT

Petitioner reports racial and xenophobic abuse by officers, extreme food and water rationing, being forced to eat spoiled food, deplorable hygiene, and systematic denial of medical care. Petitioner suffers from chronic asthma and severe allergies, placing him at substantial risk of serious harm.

VI. LEGAL ARGUMENT

Petitioner's detention violates the Due Process Clause of the Fifth Amendment.

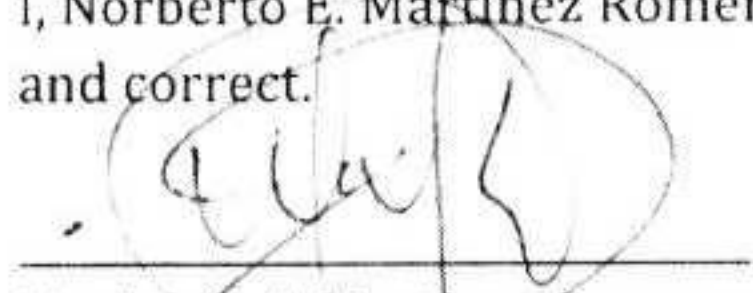
- A. Prolonged and Punitive Detention – *Zadvydas v. Davis*, 533 U.S. 678 (2001)
- B. Arbitrary Detention – *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018)
- C. Unconstitutional Conditions – *Bell v. Wolfish*, 441 U.S. 520 (1979)
- D. Deliberate Indifference – *Farmer v. Brennan*, 511 U.S. 825 (1994)
- E. Authority to Grant Habeas Relief – *Demore v. Kim*, 538 U.S. 510 (2003)

VII. RELIEF REQUESTED

Petitioner respectfully requests immediate release, injunctive relief against transfer or removal, and any other relief deemed just.

VIII. VERIFICATION

I, Norberto E. Martínez Romero, declare under penalty of perjury that the foregoing is true and correct.



Norberto E. Martínez Romero

Next Friend for Petitioner

Date: 2-7-2026

PROOF OF SERVICE

I hereby certify that on the date indicated below, I served a true and correct copy of the following documents:

- Petition for Writ of Habeas Corpus (28 U.S.C. § 2241)
- Motion for Immediate Release
- Motion to Expedite
- Emergency Motion for Temporary Restraining Order and Proposed Order
- Declaration of Next Friend

In the matter of:

ÁNGEL DANIEL MORAN QUIROGA

A# 

by depositing the same in the United States Mail, first-class postage prepaid, addressed as follows:

1. UNITED STATES DISTRICT COURT

United States District Court
Northern District of Texas – San Angelo Division
33 E. Twohig Avenue, Room 202
San Angelo, TX 76903

2. UNITED STATES ATTORNEY'S OFFICE

U.S. Attorney's Office
Northern District of Texas
1100 Commerce Street, 3rd Floor
Dallas, TX 75242

3. DEPARTMENT OF HOMELAND SECURITY / ICE

U.S. Department of Homeland Security
Immigration and Customs Enforcement (ICE)
Office of the Principal Legal Advisor (OPLA)
600 E. Jackson Street, Suite 800
Brownsville, TX 78520

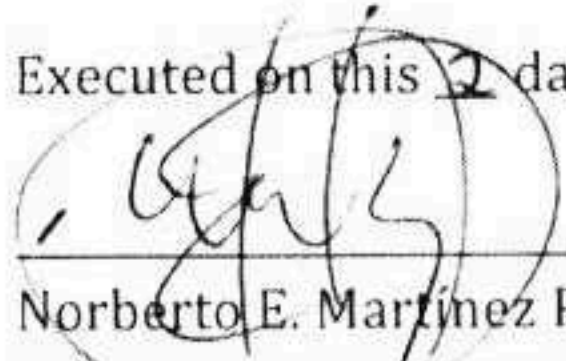
4. RESPONDENT CUSTODIAN

Warden
Eden Detention Center

702 E Broadway
Eden, TX 76837

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

Executed on this 2 day of ~~February~~ 2026.



Norberto E. Martinez Romero
Next Friend for Petitioner

