

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA**

STHEPANY TLACHI MUÑOZ,
as Next Friend of
EFRAIN TLACHI MEDINA,

4:26 CV 799 CDL CHW

Petitioner,

v.

**WARDEN, STEWART DETENTION CENTER;
U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE);
U.S. DEPARTMENT OF HOMELAND SECURITY,**

Respondents.

**PETITION FOR WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241 AND
EMERGENCY REQUEST FOR RELEASE, BOND HEARING, AND REVIEW OF
DETENTION**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, STHEPANY TLACHI MUÑOZ, lawful permanent resident of the United States, acting as Next Friend on behalf of her father, EFRAIN TLACHI MEDINA, and respectfully petitions this Honorable Court for issuance of a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241, and for emergency relief, and for cause states as follows:

I. INTRODUCTION

This matter arises from the unlawful, arbitrary, and constitutionally deficient detention of Mr. EFRAIN TLACHI MEDINA, currently detained at Stewart Detention Center in Lumpkin, Georgia, under the authority of Immigration and Customs Enforcement ("ICE"). Petitioner seeks urgent judicial intervention because Mr. Tlachi Medina has been deprived of his liberty without due process of law, denied a meaningful opportunity for release on bond, subjected to

arbitrary detention practices, and deprived of adequate access to legal and medical protections guaranteed under the Constitution and laws of the United States. This Petition is brought by his daughter, STHEPANY TLACHI MUÑOZ, a lawful permanent resident of the United States, who acts as Next Friend due to her father's restricted access to legal resources while detained and the extraordinary hardship imposed upon their family as a result of his detention.

II. JURISDICTION AND VENUE

This Court has jurisdiction pursuant to 28 U.S.C. § 2241 because this Petition challenges the legality and constitutionality of federal immigration detention. Venue is proper in the Middle District of Georgia because Mr. Tlachi Medina is currently detained within this judicial district at Stewart Detention Center located in Lumpkin, Georgia.

III. PARTIES

Petitioner STHEPANY TLACHI MUÑOZ is the adult daughter of Mr. Tlachi Medina, twenty years of age, and a lawful permanent resident of the United States residing at [REDACTED]. Mr. Tlachi Medina is the biological father of Petitioner and the primary source of emotional and financial support for his children and household. Detainee EFRAIN TLACHI MEDINA, A-Number [REDACTED] is a citizen of Mexico, born on [REDACTED]. Respondents are the federal agencies and custodial officers responsible for his detention and confinement.

IV. STATEMENT OF FACTS

Mr. Tlachi Medina was detained by ICE on or about April 21, 2026, during the early morning hours while traveling to work. At approximately 5:00 a.m., he informed his family he was leaving to pick up another worker before reporting to his construction employment. Shortly thereafter, unknown individuals operating unmarked and undercover vehicles began following and surrounding him. These individuals were dressed as civilians and were not immediately identifiable as law enforcement officers. Petitioner and her family reasonably believed they were being targeted unlawfully due to the covert nature of the stop and detention. Mr. Tlachi Medina was subsequently apprehended by ICE officers operating in unmarked vehicles without meaningful explanation to his family regarding the basis for detention. During the same period, Petitioner's younger brother, who was traveling to school, was also stopped under similar circumstances. The circumstances surrounding the detention demonstrate arbitrary enforcement methods, lack of transparency, and serious due process concerns. Mr. Tlachi Medina possesses employment authorization and has longstanding ties to the United States

community. On May 6, 2026, he appeared before the immigration court. Rather than addressing the legality of detention or bond eligibility, the proceedings were continued and rescheduled for May 28, 2026. No bond was granted. To date: • He has not received a meaningful bond determination; • ICE has failed to provide adequate information to family members; • He has experienced limited access to legal resources; • He has experienced deteriorating health conditions while detained; • He has not received adequate medical care despite complaints relating to low blood sugar and cholesterol conditions.

V. FAMILY HARDSHIP AND HUMANITARIAN FACTORS

Mr. Tlachi Medina has resided in the United States since approximately April 2004 and has established substantial community and family ties within this country. Although he departed the United States pursuant to immigration-related proceedings in 2024 and later reentered the country, he continued supporting his family and maintaining economic stability for those dependent upon him. Petitioner respectfully informs this Court that her mother passed away on August 18, 2017. Following her death, Mr. Tlachi Medina assumed full parental responsibility and custody over Petitioner and her siblings, becoming their sole source of emotional guidance, parental care, and financial support. Petitioner's younger sister is currently only ten months old. Additionally, Petitioner's seventeen-year-old brother and Petitioner herself remain dependent on Mr. Tlachi Medina for financial and emotional support, including assistance connected to Petitioner's lawful immigration status process. Mr. Tlachi Medina also operates a construction company through which he supports workers and contributes to the economy and labor force of the United States. His detention has created devastating consequences not only for his immediate family but also for workers and households dependent upon his business and employment opportunities.

VI. MEDICAL NEGLIGENCE AND CONDITIONS OF DETENTION

While detained at Stewart Detention Center, Mr. Tlachi Medina became ill and reported medical concerns involving blood sugar instability and cholesterol-related conditions. Despite these complaints, adequate medical treatment has allegedly not been provided. Such conduct constitutes deliberate indifference to serious medical needs and raises substantial constitutional concerns under principles of due process and basic standards of custodial care.

VII. VIOLATIONS OF DUE PROCESS AND UNLAWFUL DETENTION

Petitioner alleges that Respondents have violated Mr. Tlachi Medina's constitutional rights through: • Arbitrary detention; • Denial of meaningful bond consideration; • Lack of

procedural transparency; • Failure to provide adequate notice and information; • Restriction of meaningful legal access; • Failure to provide proper medical care; • Coercive and irregular enforcement tactics utilizing undercover and unmarked vehicles. The continued detention of Mr. Tlachi Medina violates the Due Process Clause of the Fifth Amendment because Respondents have failed to justify continued confinement through individualized findings demonstrating either danger to the community or risk of flight.

VIII. ABSENCE OF FLIGHT RISK AND DANGER TO THE COMMUNITY

Mr. Tlachi Medina is not a danger to society and does not represent a flight risk. To the contrary: • He has longstanding family ties within the United States; • He has resided in the country for many years; • He maintains stable employment and business operations; • He supports multiple dependents, including minor children; • He actively contributes to the community and economy through construction work and employment opportunities; • He has consistently acted as caretaker and provider for his family following the death of Petitioner's mother. There is no evidence that Mr. Tlachi Medina poses any threat to public safety. His continued detention serves no legitimate governmental purpose and instead imposes extraordinary hardship upon innocent family members and dependents.

IX. IRREPARABLE HARM

Absent immediate intervention by this Court, Petitioner and her family will continue suffering irreparable harm. The prolonged detention of Mr. Tlachi Medina has already resulted in: • Severe emotional distress; • Financial instability; • Lack of parental support for minor children; • Risk to family housing and economic security; • Harm to workers dependent upon his business; • Medical deterioration while detained. Such harm cannot adequately be remedied through monetary damages alone.

X. REQUEST FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Honorable Court: 1. Issue a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241; 2. Order the immediate release of EFRAIN TLACHI MEDINA from detention; 3. Alternatively, order an immediate individualized bond hearing; 4. Order review of the legality and constitutionality of continued detention; 5. Order alternative supervision or release conditions if deemed appropriate by the Court; 6. Grant any additional relief deemed just, equitable, and proper.

XI. COMMUNITY CONTRIBUTIONS AND POSITIVE EQUITIES

Mr. Tlachi Medina has demonstrated longstanding and meaningful contributions to the community and economy of the United States through his construction business and employment activities. For years, he has provided labor opportunities, financial support, and economic stability not only for his own household, but also for workers and individuals dependent upon his business operations. His detention has disrupted the livelihood of multiple individuals who relied upon his employment opportunities and leadership. Petitioner respectfully submits that Mr. Tlachi Medina has consistently acted as a hardworking provider, community contributor, and caretaker for his family and others around him.

XII. FAILURE TO PROVIDE INDIVIDUALIZED DETERMINATION

Respondents have failed to provide any meaningful individualized determination demonstrating that Mr. Tlachi Medina constitutes either a danger to society or a risk of flight. Despite continued detention, ICE has not articulated sufficient factual findings justifying prolonged confinement without bond. The absence of individualized review renders detention excessive, punitive, and constitutionally deficient under the Due Process Clause of the Fifth Amendment.

XIII. IRREGULAR ENFORCEMENT METHODS AND LACK OF TRANSPARENCY

Petitioner further asserts that the circumstances surrounding Mr. Tlachi Medina's detention raise serious concerns regarding transparency and procedural fairness. The detention involved undercover and unmarked vehicles operated by individuals initially appearing as civilians rather than identifiable law enforcement officers, creating confusion, fear, and uncertainty for both Mr. Tlachi Medina and his family. Such circumstances contributed to the family's inability to understand the nature and basis of the detention at the time it occurred and further support Petitioner's concerns regarding arbitrary enforcement practices.

XIV. ADDITIONAL FAMILY HARDSHIP AND PARENTAL RESPONSIBILITY

Petitioner respectfully informs this Honorable Court that her mother passed away on August 18, 2017. Following her death, Mr. Tlachi Medina assumed full responsibility for the care, upbringing, emotional support, and financial stability of his children. Since that time, he has acted as both father and sole parental provider, ensuring the welfare and stability of the household during an extremely difficult period in the family's life. His detention has caused substantial emotional distress and instability to his children, particularly given the important parental role he has maintained since the passing of Petitioner's mother. The continued detention of Mr. Tlachi Medina therefore imposes extraordinary hardship not only financially,

but emotionally and psychologically upon his family and dependents.

XV. MEDICAL NEGLECT AND DETERIORATING HEALTH CONDITIONS

Petitioner further asserts that Mr. Tlachi Medina's medical condition has worsened while detained at Stewart Detention Center. Despite complaints involving low blood sugar, cholesterol-related complications, and physical illness while detained, adequate medical evaluation and treatment have allegedly not been timely provided. Failure to provide appropriate medical care to detainees constitutes a serious violation of basic custodial standards and further supports the urgent necessity of judicial intervention and release.

Respectfully submitted,

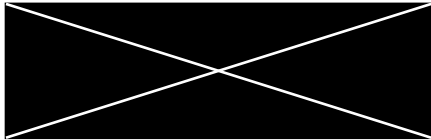
STHEPANY TLACHI MUÑOZ 741 Weatherborn Pl Stone Mountain, GA 30083 Phone:
404 468 5993 Next Friend for EFRAIN TLACHI MEDINA Date: 5/7/2026

SWORN DECLARATION OF NEXT FRIEND

I, STHEPANY TLACHI MUÑOZ, 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 daughter of detainee EFRAIN TLACHI MEDINA, A-Number 243-039-628, currently detained at Stewart Detention Center in Lumpkin, Georgia.

2. I am a lawful permanent resident of the United States and reside at:



3. I submit this declaration in support of the Petition for Writ of Habeas Corpus filed on behalf of my father as his Next Friend due to his limited access to legal resources while detained.

4. My father has been the primary source of emotional and financial support for our household for many years.

5. Following the death of my mother on August 18, 2017, my father assumed full responsibility for my care, upbringing, emotional support, and financial stability, as well as the care of my siblings.

6. My father is not a danger to society and does not represent a flight risk. He has longstanding family ties within the United States, maintains employment in the construction industry, and supports multiple dependents, including minor children.

7. His detention has caused severe emotional distress and financial hardship upon our family, including my ten-month-old sister and my seventeen-year-old brother.

8. While detained, my father has experienced health complications involving blood sugar instability and cholesterol-related conditions, and adequate medical attention has allegedly not been provided.

9. I respectfully request that this Honorable Court grant the relief requested in the Petition for Writ of Habeas Corpus, including immediate release or, alternatively, a meaningful individualized bond hearing.

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

Executed on this ____ day of _____, 2026.

STEPANY TLACHI MUÑOZ
Next Friend for EFRAIN TLACHI MEDINA

CERTIFICATE OF SERVICE

I hereby certify that on this 7 day of May, 2026, I caused a true and correct copy of the foregoing Petition for Writ of Habeas Corpus, together with all supporting documents and exhibits, to be served by U.S. Mail and/or electronic mail upon the following parties:

Office of the United States Attorney
Middle District of Georgia
P.O. Box 1702
Macon, GA 31202 1702

U.S. Immigration and Customs Enforcement (ICE)
Stewart Detention Center
146 CCA Road
Lumpkin, GA 31815

Office of Chief Counsel
U.S. Department of Homeland Security
180 Ted Turner Drive SW, Suite 522
Atlanta, GA 30303



STHEPANY TLACHI MUÑOZ
Next Friend for EFRAIN TLACHI MEDINA