

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

WILLIAMS JOSE URBINA RANGEL

A# 

Petitioner,

v.

WARDEN, ELIZABETH DETENTION FACILITY, et al.,

Respondents.

Civil Action No. _____

NOTICE OF FILING

TO THE HONORABLE COURT, RESPONDENTS, AND ALL PARTIES OF RECORD:

PLEASE TAKE NOTICE that Petitioner, **Williams Jose Urbina Rangel** (A#  ) , proceeding pro se, hereby files the following documents in support of his request for relief:

1. **Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241;**
2. **Emergency Motion for Temporary Restraining Order (TRO);**
3. **Application to Proceed In Forma Pauperis (AO 240);**
4. **Copy of Venezuelan Passport;**
5. **Notice to Appear (Form I-862);**
6. **Form I-94 Arrival/Departure Record;**
7. **Employment Authorization Approval Notice (Form I-797);**
8. **Any additional supporting exhibits attached hereto.**

Petitioner respectfully requests that the Court docket the foregoing filings, review the Emergency Motion for Temporary Restraining Order on an expedited basis, and grant such other relief as the Court deems just and proper.

Respectfully submitted,



WILLIAMS JOSE URBINA RANGEL

A# 

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

WILLIAMS JOSE URBINA RANGEL

A# 

Petitioner,

v.

WARDEN, ELIZABETH DETENTION FACILITY;
TODD LYONS, Acting Director, ICE;
KRISTI NOEM, Secretary of Homeland Security,

Respondents.

Civil Action No. _____

PETITION FOR WRIT OF HABEAS CORPUS

PURSUANT TO 28 U.S.C. § 2241

I. INTRODUCTION

Petitioner, **Williams Jose Urbina Rangel**, a citizen of Venezuela presently detained by Immigration and Customs Enforcement ("ICE") at the Elizabeth Detention Facility in Elizabeth, New Jersey, respectfully petitions this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. §2241.

This Petition challenges the legality of Petitioner's continued detention because such detention violates the Due Process Clause of the Fifth Amendment to the United States Constitution.

Petitioner is not a danger to the community.

Petitioner has no criminal convictions.

Petitioner has no history of violence.

Petitioner has no gang affiliation.

Petitioner has never been accused of terrorism, drug trafficking, weapons offenses, fraud, assault, robbery, domestic violence, or any offense involving public safety.

Petitioner entered the United States on September 14, 2024 and subsequently received employment authorization from USCIS valid through September 13, 2026.

Despite posing no threat to public safety, ICE continues to deprive Petitioner of his liberty through civil detention without any individualized determination that such detention is necessary.

Because detention is the most severe civil restraint available to the government, continued confinement under these circumstances violates constitutional due process protections.

II. JURISDICTION

This Court has jurisdiction pursuant to:

- 28 U.S.C. §2241;
- 28 U.S.C. §1331;
- The Fifth Amendment to the United States Constitution.

Federal courts retain habeas jurisdiction over constitutional challenges to immigration detention.

See:

- *Zadvydas v. Davis*, 533 U.S. 678 (2001);
- *Demore v. Kim*, 538 U.S. 510 (2003);
- *Jennings v. Rodriguez*, 583 U.S. 281 (2018).

III. PARTIES

Petitioner

Williams Jose Urbina Rangel

A# 

Citizen of Venezuela.

Currently detained at:

Elizabeth Detention Facility
625 Evans Street
Elizabeth, NJ 07201

Respondents

The Warden of Elizabeth Detention Facility;

Todd Lyons, Acting Director of ICE;

Kristi Noem, Secretary of Homeland Security.

IV. FACTUAL BACKGROUND

Petitioner was born on [REDACTED] in Cojedes, Venezuela. His Venezuelan passport remains valid through June 5, 2033.

Petitioner lawfully presented himself at the Hidalgo, Texas Port of Entry on September 14, 2024. The government issued an I-94 reflecting admission documentation and parole-related processing.

Following entry, Petitioner complied with immigration requirements and sought employment authorization.

USCIS approved Petitioner's Application for Employment Authorization under category C11, granting authorization valid from October 11, 2024 through September 13, 2026.

Petitioner established residence, worked, and integrated into the community.

Petitioner has never been convicted of a crime.

Petitioner has never been incarcerated for any criminal offense.

Petitioner has never committed acts of violence.

Petitioner has never represented any threat to public safety.

On or about May 29, 2026, ICE officers arrested Petitioner and placed him into immigration detention.

Since that date he has remained deprived of his liberty.

Petitioner has family support, community support, and an available residence if released.

Petitioner is willing to comply with any reporting requirements imposed by DHS.

Petitioner is willing to submit to GPS monitoring.

Petitioner is willing to comply with electronic monitoring.

Petitioner is willing to comply with an Order of Supervision.

Petitioner is willing to appear for all future immigration proceedings.

V. GROUNDS FOR HABEAS RELIEF

COUNT I

VIOLATION OF THE FIFTH AMENDMENT

The Due Process Clause protects every person physically present in the United States from arbitrary governmental detention.

Freedom from bodily restraint is one of the most fundamental constitutional liberties recognized by American law.

See:

Zadvydas v. Davis, 533 U.S. 678, 690 (2001).

Civil immigration detention cannot become punitive.

Civil detention must remain reasonably related to a legitimate governmental objective.

Petitioner presents no danger to the community.

Petitioner presents no public-safety concern.

Respondents cannot justify continued confinement based solely upon immigration status.

Accordingly, continued detention violates substantive due process.

COUNT II

ARBITRARY DEPRIVATION OF LIBERTY

Government detention becomes unconstitutional when it is excessive in relation to its purpose.

Petitioner:

- has no criminal history;
- has no violent history;
- has stable employment history;
- has community ties;
- has an available residence;
- is fully identifiable through government records;
- possesses valid Venezuelan travel documents;
- is willing to comply with supervision conditions.

Under these circumstances, continued incarceration is excessive and unreasonable.

COUNT III

DETENTION IS NOT THE LEAST RESTRICTIVE MEANS

Even if the government possesses a legitimate interest in ensuring future appearances, detention is unnecessary because less restrictive alternatives exist.

Petitioner agrees to:

- GPS monitoring;
- electronic monitoring;
- telephonic reporting;
- in-person reporting;
- home visits;
- supervision by ICE;
- any other reasonable condition.

Because effective alternatives exist, continued confinement is unconstitutional.

COUNT IV

PETITIONER IS NEITHER A DANGER NOR A FLIGHT RISK

Federal courts routinely recognize that detention may become unconstitutional where a detainee:

- lacks criminal history;
- lacks violent history;
- has community ties;
- has an available residence;
- demonstrates willingness to comply.

Petitioner satisfies all of these factors.

Nothing in the record demonstrates that Petitioner poses a danger to the public.

Nothing demonstrates that detention is necessary to ensure compliance.

COUNT V

IRREPARABLE HARM

Every additional day of confinement causes irreparable injury.

The Supreme Court has repeatedly recognized that the loss of liberty constitutes irreparable harm.

See:

Elrod v. Burns, 427 U.S. 347 (1976).

Petitioner continues to suffer:

- emotional distress;
- anxiety;
- psychological hardship;
- separation from family and community;

- inability to work and support himself.

Such harms cannot be fully remedied by money damages.

VI. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Court:

Issue a Writ of Habeas Corpus pursuant to 28 U.S.C. §2241.

Find that Petitioner's continued detention violates the Fifth Amendment.

Order Respondents to immediately release Petitioner from ICE custody.

Alternatively, order release under reasonable conditions of supervision.

Grant expedited consideration of this Petition.

Award any additional relief the Court deems just and proper.

Respectfully submitted,



WILLIAMS JOSE URBINA RANGEL

A#



Elizabeth Detention Facility
625 Evans Street
Elizabeth, NJ 07201

Petitioner Pro Se

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

WILLIAMS JOSE URBINA RANGEL

A# [REDACTED]

Petitioner,

v.

**WARDEN, ELIZABETH DETENTION FACILITY;
TODD LYONS, Acting Director, ICE;
KRISTI NOEM, Secretary of Homeland Security,**

Respondents.

Civil Action No. _____

EMERGENCY MOTION FOR TEMPORARY RESTRAINING ORDER (TRO)

Petitioner, **Williams Jose Urbina Rangel**, proceeding pro se, respectfully moves this Honorable Court for issuance of an Emergency Temporary Restraining Order pursuant to Rule 65(b) of the Federal Rules of Civil Procedure, prohibiting Immigration and Customs Enforcement (“ICE”), the Department of Homeland Security (“DHS”), and all agents acting on their behalf from removing Petitioner from the United States until this Court adjudicates the pending Petition for Writ of Habeas Corpus.

In support thereof, Petitioner states as follows:

I. INTRODUCTION

Petitioner is currently detained by ICE at the Elizabeth Detention Facility in Elizabeth, New Jersey.

Petitioner faces the imminent risk of removal before this Court has an opportunity to review the serious constitutional claims presented in his Petition for Writ of Habeas Corpus.

Without emergency judicial intervention, Respondents may remove Petitioner from the United States at any time.

Such removal would effectively deprive Petitioner of meaningful access to this Court, frustrate judicial review, and cause irreparable harm.

Accordingly, emergency temporary relief is necessary to preserve the status quo while this Court considers the merits of the pending habeas proceedings.

II. FACTUAL BACKGROUND

Petitioner is a citizen of Venezuela.

Petitioner entered the United States on September 14, 2024. Government records confirm his admission processing and issuance of an I-94. USCIS subsequently approved employment authorization valid through September 13, 2026.

Petitioner has no criminal convictions.

Petitioner has no history of violence.

Petitioner has no gang affiliation.

Petitioner has never been charged with any offense involving danger to the community.

Petitioner is currently detained solely under civil immigration authority.

Petitioner has substantial legal claims presently being pursued through federal court proceedings and related immigration remedies.

If Respondents remove Petitioner before those claims are adjudicated, the relief sought in this action may become effectively impossible to obtain.

III. LEGAL STANDARD

A Temporary Restraining Order is appropriate when the moving party demonstrates:

1. A likelihood of success on the merits;
2. Irreparable harm absent relief;
3. That the balance of equities favors relief; and
4. That the public interest supports relief.

Winter v. Natural Resources Defense Council, Inc., 555 U.S. 7 (2008).

Federal courts possess authority to preserve their jurisdiction and prevent actions that would render pending litigation meaningless.

IV. ARGUMENT

A. PETITIONER WILL SUFFER IRREPARABLE HARM ABSENT A TRO

Removal from the United States before judicial review occurs would cause immediate and irreparable injury.

Once removed, Petitioner may lose meaningful access to counsel, witnesses, evidence, and judicial review.

Removal would severely impair Petitioner's ability to pursue his constitutional claims and would effectively defeat the purpose of the pending habeas proceedings.

Courts consistently recognize that the loss of constitutional rights and meaningful access to the courts constitutes irreparable harm.

See *Elrod v. Burns*, 427 U.S. 347 (1976).

B. PETITIONER PRESENTS SERIOUS CONSTITUTIONAL CLAIMS

The Petition for Writ of Habeas Corpus raises substantial constitutional issues concerning continued civil immigration detention.

Petitioner is not a danger to the community.

Petitioner has no criminal history.

Petitioner has demonstrated compliance with governmental processes, including obtaining employment authorization through USCIS.

The Fifth Amendment protects all persons within the United States against arbitrary governmental deprivation of liberty.

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

Accordingly, Petitioner has presented serious questions warranting judicial review.

C. THE BALANCE OF EQUITIES STRONGLY FAVORS RELIEF

The harm to Petitioner is immediate and severe.

By contrast, issuance of a temporary restraining order merely preserves the status quo while the Court considers the pending habeas petition.

The Government suffers no meaningful prejudice from a brief delay in removal while constitutional claims are reviewed.

Therefore, the balance of equities weighs heavily in Petitioner's favor.

D. THE PUBLIC INTEREST SUPPORTS PRESERVING JUDICIAL REVIEW

The public has a strong interest in ensuring that constitutional claims receive meaningful review before potentially irreversible governmental action occurs.

The public interest is served when federal courts maintain the ability to adjudicate pending cases and safeguard constitutional protections.

Preserving the status quo pending judicial review advances that interest.

V. REQUEST FOR EMERGENCY RELIEF

Petitioner respectfully requests that this Court immediately issue a Temporary Restraining Order directing Respondents, their officers, employees, agents, contractors, successors, and all persons acting in concert with them to:

1. CEASE and REFRAIN from removing Petitioner from the United States;
2. CEASE and REFRAIN from transferring Petitioner outside the jurisdiction of this Court without prior authorization;
3. Maintain the status quo pending adjudication of the Petition for Writ of Habeas Corpus;
4. Grant such additional relief as the Court deems just and proper.

VI. CONCLUSION

For the foregoing reasons, Petitioner respectfully requests that this Court GRANT this Emergency Motion for Temporary Restraining Order and prohibit his removal until the Court fully adjudicates the pending habeas corpus proceedings.

Respectfully submitted,



WILLIAMS JOSE URBINA RANGEL

A#

Elizabeth Detention Facility
625 Evans Street
Elizabeth, NJ 07201

Petitioner Pro Se

UNITED STATES DISTRICT COURT

DISTRICT OF NEW JERSEY

WILLIAMS JOSE URBINA RANGEL

A# 

Petitioner,

v.

WARDEN, ELIZABETH DETENTION FACILITY, et al.,

Respondents.

Civil Action No. _____

**APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT
PREPAYING FEES OR COSTS**

(IN FORMA PAUPERIS)

28 U.S.C. § 1915

I, **Williams Jose Urbina Rangel**, declare under penalty of perjury that the following information is true and correct:

I. PERSONAL INFORMATION

Name:

Williams Jose Urbina Rangel

Alien Registration Number:

A# 

Current Place of Detention:

Elizabeth Contract Detention Facility
625 Evans Street
Elizabeth, NJ 07201

II. EMPLOYMENT

A. Current Employment

I am currently employed:

☐ Yes

☒ No

I am presently detained by Immigration and Customs Enforcement (ICE) and unable to work.

B. Previous Employment

Before detention I worked in the United States and possessed a valid Employment Authorization Document issued by USCIS.

My employment ended upon detention.

Approximate Monthly Income Before Detention:

\$2600

Employer:

Occupation:

III. INCOME

During the past twelve months I have received:

Employment Income:

☒ No

Government Benefits:

☒ No

Unemployment Benefits:

☒ No

Social Security:

☒ No

Retirement Benefits:

☒ No

Disability Benefits:

☒ No

Other Income:

☒ No

Total Current Monthly Income:

\$0.00

IV. CASH AND FINANCIAL ACCOUNTS

Cash on Hand:

\$0.00

Money in Checking Account:

\$0.00

Money in Savings Account:

\$0.00

Other Financial Assets:

\$0.00

V. PROPERTY

I do not own:

☒ Real Estate

☒ Stocks

☒ Bonds

☒ Business Interests

☒ Valuable Personal Property

Estimated Value of Property:

\$0.00

VI. DEPENDENTS

Do you support any dependents?

☐ Yes

☒ No

If yes, identify dependents:

VII. DEBTS AND FINANCIAL OBLIGATIONS

I have limited financial resources and am unable to pay court filing fees while detained.

I do not possess sufficient assets to pay the filing fee required by this Court.

VIII. STATEMENT OF POVERTY

Because I am presently detained by ICE, unemployed, without income, without significant assets, and unable to earn wages, I am unable to pay the filing fee required for this action.

Payment of the filing fee would create substantial hardship and effectively deny me access to the courts.

I therefore request permission to proceed **In Forma Pauperis** pursuant to 28 U.S.C. §1915.

DECLARATION

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

At:

Elizabeth Contract Detention Facility
Elizabeth, New Jersey

Signature:



WILLIAMS JOSE URBINA RANGEL

A#



Petitioner Pro Se

A0 240

APPLICATION TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING FEES OR COSTS

1. Personal Information

First Name: Williams Jose

Last Name: Urbina Rangel

Prisoner Number: A# 

Institution: Elizabeth Contract Detention Facility

Address:

625 Evans Street
Elizabeth, NJ 07201

2. Employment

Are you employed?

☒ No

Reason:

Currently detained by Immigration and Customs Enforcement (ICE) and unable to work.

Have you been employed within the last two years?

☒ Yes

Employer:

Occupation:

Average Monthly Salary: \$2600

3. Income

During the past 12 months have you received money from:

Business or Self-Employment

☒ No

Rent Payments

☒ No

Interest or Dividends

☒ No

Pensions

☒ No

Disability Benefits

☒ No

Unemployment

☒ No

Public Assistance

☒ No

Gifts or Inheritance

☒ No

Any Other Sources

☒ No

4. Cash and Bank Accounts

Cash:

\$0.00

Checking:

\$0.00

Savings:

\$0.00

5. Assets

Real Estate:

☒ None

Automobile:

☒ None

Stocks or Bonds:

☒ None

Business Interests:

☒ None

Other Valuable Property:

☒ None

6. Financial Obligations

Monthly Expenses:

\$0.00 while detained

Outstanding Debts:

(if any)

Otherwise:

None

7. Dependents

If no dependents:

☒ None

Declaration

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

Signature:



Williams Jose Urbina Rangel

A#



CERTIFICATE OF SERVICE

I, **Williams Jose Urbina Rangel** (A# ) hereby certify under penalty of perjury pursuant to 28 U.S.C. § 1746 that on this **3rd day of June, 2026**, I served a true and correct copy of the following documents:

1. Petition for Writ of Habeas Corpus Pursuant to 28 U.S.C. § 2241;
2. Emergency Motion for Temporary Restraining Order;
3. Application to Proceed In Forma Pauperis (AO 240);
4. Notice of Filing;
5. All supporting exhibits attached thereto;

by depositing said documents in the institutional mail system for forwarding by United States Mail, postage prepaid, addressed to:

United States Attorney for the District of New Jersey

Civil Process Clerk
Office of the United States Attorney
970 Broad Street, Suite 700
Newark, NJ 07102

Office of Chief Counsel

U.S. Immigration and Customs Enforcement (ICE)
625 Evans Street
Elizabeth, NJ 07201

Warden

Elizabeth Detention Facility
625 Evans Street
Elizabeth, NJ 07201

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

Executed on **June 3, 2026**.

Respectfully submitted,



WILLIAMS JOSE URBINA RANGEL

A# 

Elizabeth Detention Facility
625 Evans Street
Elizabeth, NJ 07201