

PETITION FOR WRIT OF HABEAS CORPUS – 28
U.S.C. § 2241

FILED

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

JAN 29 2026

CLERK, U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY DEPUTY CLERK

Petitioner: Ana Maria Ciofu

Respondents: M. Licon, Warden, South Texas Detention Complex;
ICE – Enforcement and Removal Operations (San Antonio Field Office)

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Jurisdiction

This Court has jurisdiction under 28 U.S.C. § 2241 because I am currently detained in this district.

Facts

- I am an asylum seeker with a pending immigration case.
- I have been detained for more than four (4) months, beginning on November 3, 2025.
- During my detention, I have been repeatedly transferred between detention facilities without any explanation or reason provided to me.
- My bond was denied without any explanation or written justification.
- I suffer from a serious foot injury that causes ongoing pain and requires medical care that is not adequately provided in detention.
- I also suffer from panic attacks and severe insomnia as a result of my continued detention.

Claims

1. My continued detention violates Due Process because my bond was denied without justification.
2. Repeated transfers between facilities interfere with my access to the court and ability to pursue my case.
3. My continued detention has caused serious medical and psychological harm, including foot pain, panic attacks, and insomnia.
4. My prolonged civil detention is excessive and unnecessary.

Relief Requested

I respectfully request that the Court grant any relief it deems just and proper, including but not limited to:

- Immediate release; OR
- Release under conditions; OR
- Temporary release, including alternatives to detention such as an ankle monitor, supervision, or parole; OR
- A bond hearing within seven (7) days.

COVER LETTER TO THE COURT

Ana Maria Ciofu



South Texas Detention Complex
566 Veteran's Drive
Pearsall, TX 78061

Clerk of Court
U.S. District Court for the Western District of Texas – San Antonio Division
655 E. Cesar Chavez Blvd., Room G-65
San Antonio, TX 78206

RE: Petition for Writ of Habeas Corpus (28 U.S.C. § 2241)

Dear Clerk,

Enclosed please find my Petition for Writ of Habeas Corpus, Emergency Motion for Release or Bond Hearing, and Motion to Proceed In Forma Pauperis.

Respectfully,
Ana Maria Ciofu

01/26/2026

Signature - Ciofu