

FILED

FEB 02 2026

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

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

SA26CA0661 XR

Weng  a minor,
by and through his mother and next friend,
Zhu Aiqing
Petitioner,

Case No. _____

v.

PETITION FOR WRIT OF
HABEAS CORPUS

Facility Director, Compass Connections;
Acting Field Office Director, San Antonio Field
Office, U.S. Immigration and Customs Enforcement;

ORAL ARGUMENT
REQUESTED

Respondents.

INTRODUCTION

1. Petitioner Weng  is a minor child and a citizen of China, currently detained at Compass Connections. He has been held for over 180 days without a removal order, bond hearing, or any individualized judicial determination, despite having committed no crime in the United States. His prolonged detention as a minor is punitive, lacks a legitimate civil purpose, and violates the Due Process Clause of the Fifth Amendment. Accordingly, this Court should grant the instant Petition for a Writ of Habeas Corpus.

JURISDICTION

2. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*, and challenges the prolonged and unlawful civil immigration detention of a minor child by U.S. Immigration and Customs Enforcement ("ICE"), in violation of the Constitution, federal immigration statutes, and applicable protections for juveniles in immigration custody.

3. This Court has subject matter jurisdiction pursuant to 28 U.S.C. § 2241, which authorizes federal courts to grant writs of habeas corpus to persons, including minor children, held in custody in violation of the Constitution or laws of the United States. This Court also has jurisdiction under 28 U.S.C. § 1331, as this action presents federal questions arising under the Constitution and federal immigration law, and under Article I, Section 9, Clause 2 of the United States Constitution (the Suspension Clause).

4. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

VENUE

5. Venue is proper in this District because Petitioner is currently detained at Compass Connections, which is located within the jurisdiction of this Court.

REQUIREMENTS OF 28 U.S.C. § 2243

6. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return “within *three days* unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.* (emphasis added).

7. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

PARTIES

8. Petitioner Weng [REDACTED] is a native and citizen of China. Petitioner is currently held at Compass Connections. He is in the custody, and under the direct control, of Respondents and their agents.

9. Respondent, the Facility Director of Compass Connections, is sued in his or her official capacity. Respondent is a legal custodian of Petitioner and has authority over Petitioner's custody and placement.

10. Respondent, the Acting Field Office Director of the San Antonio Field Office of U.S. Immigration and Customs Enforcement, is sued in his or her official capacity. Respondent is a legal custodian of Petitioner and has authority to release Petitioner.

STATEMENT OF FACTS

11. Petitioner Weng [REDACTED] is a minor citizen of China. On or about May 16, Petitioner and his father submitted an asylum application to U.S. immigration authorities in New York, at which time Petitioner was issued an Alien Registration Number (A-Number) [REDACTED] in connection with that application.

12. Subsequently, while Petitioner and his father were seeking immigration assistance at a separate immigration-related facility, they were taken into custody, and a second A-Number was generated or assigned to Petitioner in connection with that detention. As a result, multiple A-Numbers have been associated with Petitioner, creating confusion in his immigration and custodial records. Petitioner further states that he has never independently filed any immigration application in the State of Texas, and that all initial asylum filings were made in New York.

13. On or about July 10, 2025, Petitioner was forcibly confined in a psychiatric facility for approximately two days, despite having committed no criminal offense. He was thereafter transferred to Compass Connections, a facility designated for the custody of minors.

14. While detained at Compass Connections, the facility repeatedly pressured Petitioner's father to consent to Petitioner's adoption or placement with third parties. Petitioner's father refused, requesting instead Petitioner's release, as Petitioner has relatives and a place to reside in the United States, and any forced adoption would result in permanent family separation. Despite these circumstances, Petitioner has remained in custody for more than 180 days, has never been shown any removal order, and has received no individualized judicial determination authorizing his continued detention, notwithstanding well-established limits on the detention of minors.

15. During his detention, Petitioner has committed no criminal offense in the United States. He has been subjected to psychological mistreatment, including threats that he would be transferred to an adult detention facility, and has been held without access to a mobile phone or electronic devices, under conditions indistinguishable from penal confinement. Petitioner's prolonged detention has deprived him of family unity and inflicted significant harm on his mental and emotional well-being, despite the availability of safe release to family members within the United States.

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

16. Issue an Order to Show Cause directing Respondents, including U.S. Immigration and Customs Enforcement and Compass Connections, to state the legal and factual basis for the continued detention of Petitioner, a minor child.

17. Order Respondents to state whether the legal protections and time limitations governing the immigration detention of minors, including but not limited to the time frames commonly applied in practice, remain in effect; and if Respondents contend that such protections or limitations have been rescinded, modified, or are otherwise inapplicable, to identify the specific statutory, regulatory, or policy authority upon which they rely.

18. Order Respondents to produce all records, authorizations, and documents relating to Petitioner's detention, including but not limited to the start and end dates of detention, the asserted legal basis for detention, and any authority claimed by ICE or its agents to exercise custodial control over Petitioner.

19. Order Respondents to rescind and invalidate the subsequently assigned Alien Registration Number (A-Number) associated with Petitioner, and to ensure that only a single A-Number is used for Petitioner in all immigration, detention, and custodial records and proceedings.

20. Grant such other and further relief as the Court deems just, proper, and necessary, including any relief required to prevent Petitioner's continued unlawful detention.

Respectfully submitted,

/s/ Zhu Aiqing

Zhu Aiqing

Zhu Aiqing

Mother and Next Friend of

Weng  a minor

Pro Se

Address: 

City, State, ZIP: Lubbock, TX 

Email: wengwengui1978@gmail.com

Dated: January 23, 2025

Re: Documents Submitted Concerning Minor Weng 

Minor: Weng 

Submitted by: Zhu Aiqing (Biological Mother of Weng )

The following documents are submitted herewith for the Court's and/or agency's review and record:

1. Petition for Writ of Habeas Corpus p. 1-6
2. Temporary Restraining Order (TRO) p. 7-8
3. Copy of Passport of Zhu Aiqing p. 9
4. Copy of Passport of Weng  p.10
5. Proof of Family Relationship between Zhu Aiqing and Weng 
(including birth certificate and/or related legal documentation) p.11-14
6. Form I-797 (Notice of Action) p. 15-16

These documents are submitted in support of matters concerning the minor's liberty, guardianship, and related immigration proceedings, and are provided for review and inclusion in the official record.

Respectfully submitted,

Signature: Zhu Aiqing

Name: Zhu Aiqing

Capacity: Biological Mother of Weng 

Date: 01/24/2026