

FILED

April 07, 2026

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

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

BY: lad
DEPUTY

CARLOS LEANDRO DIAZ FUENMAYOR,
Petitioner,

v. Case No. 6:26-CV-00099

WARDEN, et al.,
Respondents.

PETITIONER'S REPLY TO RESPONDENTS' RESPONSE

TO THE HONORABLE JUDGE OF SAID COURT:

Petitioner respectfully replies:

I. RESPONDENTS FAIL TO ADDRESS THE CORE CONSTITUTIONAL ISSUE

Respondents rely on general statutory authority to justify detention, yet they fail to address the fundamental constitutional issue: whether prolonged detention without a meaningful opportunity for release violates due process. It does.

II. DETENTION HAS BECOME PUNITIVE AND UNREASONABLE

Petitioner has now been detained for an extended period exceeding six months. Such prolonged detention, without individualized justification, is no longer administrative but punitive in nature.

III. NO INDIVIDUALIZED RISK JUSTIFICATION

Respondents present no evidence that Petitioner is a danger or a flight risk. Petitioner has no criminal history and has complied with all immigration obligations. Continued detention is therefore arbitrary.

IV. LACK OF MEANINGFUL REVIEW

Petitioner has not been afforded a meaningful opportunity to obtain release. The absence of a bond hearing or equivalent procedural safeguard renders the detention unconstitutional.

V. TRANSFER UNDERMINES ACCESS TO JUSTICE

The transfer of Petitioner during the pendency of this habeas action has imposed additional burdens and interfered with his ability to effectively litigate his claims.

VI. CONCLUSION

Respondents' arguments fail to justify the continued detention of Petitioner. The Constitution does not permit indefinite or unjustified confinement.

WHEREFORE, Petitioner respectfully requests that this Court:

1. Order immediate release; OR
2. Order an immediate bond hearing.

Respectfully submitted,

/s/ Carlos Leandro Diaz Fuenmayor

Petitioner (Pro Se)