

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

Arianna Del Carmen Pacheco-Melendez
Petitioner-Plaintiff,

V.

Miguel Vergara,
Field Office Director
U.S. Immigration and Customs Enforcement;

Rose Thompson,
Facility Warden
Karnes County Immigration Processing Center,

Respondents-Defendants

**EMERGENCY PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO
28 U.S.C. §2241 AND COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF**

I. INTRODUCTION

Petitioner **Arianna Del Carmen Pacheco-Melendez** respectfully petitions this Court for a writ of habeas corpus pursuant to 28 U.S.C. § 2241. Petitioner entered the United States without inspection on May 3, 2021. She subsequently filed an Application for Asylum (Form I-589) on May 3, 2022, which remains pending. Petitioner was also granted Temporary Protected Status (TPS) under the Venezuela designation, with approval valid through April 2, 2025. During the validity of her TPS, she maintained lawful status and was authorized to work in the United States. She was issued a valid Employment Authorization Document and Social Security card.

Following the termination of Venezuela's TPS designation by the Department of Homeland Security, her TPS expired by operation of law. She did not renew because the Venezuelan TPS designation ended and no renewal period was available to her. The lapse of her TPS therefore resulted from the statutory termination of the country designation, not from any violation, misconduct, or failure to comply with immigration requirements.

On February 9, 2026, Petitioner appeared for her regularly scheduled ICE check-in appointment, fully complying with all reporting requirements. Instead of being allowed to depart, she was detained at the check-in and taken into ICE custody. She was not charged with any criminal offense. She is currently civilly detained at the Karnes County Immigration Processing Center despite having no criminal history, posing no danger to the community, and presenting no flight risk. No individualized determination has been made that detention is necessary.

Petitioner remains in active removal proceedings, with a Master Calendar Hearing scheduled for March 31, 2027. She has complied with all immigration obligations, has a pending asylum application, and has every incentive to appear for future proceedings. Despite the civil nature of immigration detention and the absence of any statutory basis requiring mandatory detention, ICE continues to detain Petitioner without a constitutionally adequate custody determination.

Petitioner seeks immediate release because her continued detention is arbitrary, unlawful, and unconstitutional.

II. PARTIES

1. Petitioner **Arianna Del Carmen Pacheco-Melendez** is a noncitizen, native and citizen of Venezuela, currently detained by ICE at the Karnes County Immigration Processing Center in Karnes City, Texas.
2. Respondent **Miguel Vergara** is the ICE Field Office Director responsible for detention operations in this District.
3. Respondent **Rose Thompson** is the Warden of the Karnes County Immigration Processing Center and Petitioner's immediate custodian.

III. FACTUAL BACKGROUND

1. Petitioner is a native and citizen of Venezuela.
2. Petitioner Arianna Del Carmen Pacheco-Melendez entered the United States without inspection on May 3, 2021.
3. On May 3, 2022, Petitioner filed Form I-589, Application for Asylum and Withholding of Removal, which remains pending.
4. Petitioner was previously granted Temporary Protected Status (TPS) under the Venezuela designation, with approval valid through April 2, 2025. She maintained lawful status during the validity of her TPS period. Following the termination of Venezuela's TPS designation by the Department of Homeland Security, her TPS expired by operation of law. She did not renew because the Venezuelan TPS designation ended and no renewal period was available.
5. Petitioner was issued a valid Employment Authorization Document (EAD) and Social Security card pursuant to her TPS grant.
6. On February 9, 2026, Petitioner appeared for her scheduled ICE check-in appointment in compliance with all reporting requirements. She was detained at that check-in and taken into ICE custody despite not being charged with any criminal offense.
7. Petitioner has no criminal record and has never been convicted of any offense in the United States or elsewhere.

8. Petitioner is currently detained at the Karnes County Immigration Processing Center pending removal proceedings.
9. Petitioner has a Master Calendar Hearing scheduled for March 31, 2027, at 9:00 A.M. CT before the San Antonio Immigration Court.
10. Despite the civil nature of immigration detention and Petitioner's full compliance with immigration requirements, ICE continues to detain her without any individualized custody determination establishing that she poses a danger to the community or a flight risk.

IV. STATUTORY AND CONSTITUTIONAL FRAMEWORK

Federal district courts have jurisdiction under 28 U.S.C. § 2241 to review whether a noncitizen is "in custody in violation of the Constitution or laws or treaties of the United States." *Zadvydas v. Davis*, 533 U.S. 678, 687 (2001). Habeas jurisdiction extends to challenges to the **fact, duration, or legality of immigration detention**, including constitutional claims. *INS v. St. Cyr*, 533 U.S. 289, 290, 301 (2001).

Where, as here, a petitioner alleges that continued detention violates due process because it is arbitrary, punitive, or unsupported by any individualized findings, habeas jurisdiction is proper.

V. ARGUMENT

A. Civil Immigration Detention Is Subject to Constitutional Due Process Limits

Immigration detention is civil, not criminal. As such, it is constitutionally permissible only if it serves a legitimate regulatory purpose and is accompanied by adequate procedural protections. *Zadvydas*, 533 U.S. at 690; *Demore v. Kim*, 538 U.S. 510, 527–28 (2003).

The Supreme Court has repeatedly emphasized that civil detention may not be imposed as punishment and may not continue where it becomes excessive in relation to its regulatory purpose. *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992); *Salerno*, 481 U.S. at 747.

Even when Congress authorizes detention, “the Due Process Clause applies to all “persons” within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533 U.S. at 693.

B. Petitioner’s Continued Detention Violates Substantive Due Process

Substantive due process forbids arbitrary civil detention that is not reasonably related to a legitimate governmental objective. *Zadvydas*, 533 U.S. at 690. The only permissible purposes of immigration detention are to prevent flight or to protect the community. *Demore*, 538 U.S. at 528.

Here, Petitioner’s detention is unsupported by any individualized finding that it serves either purpose:

1. Petitioner has no criminal history.
2. She entered the United States on May 3, 2021, and has remained in this country while pursuing lawful immigration relief, including a pending asylum application.
3. She was previously granted Temporary Protected Status under the Venezuela designation and was authorized to work in the United States during the validity of that status.

4. She has a pending Form I-589 asylum application and a scheduled Master Calendar Hearing on March 31, 2027, giving her every incentive to appear for future immigration proceedings.
5. No adjudicator has ever found her to be a danger to the community or a flight risk.
6. Petitioner is being subjected to continued detention without an individualized custody determination demonstrating that her detention is necessary, rendering meaningful review illusory and violating due process.

ICE's continued detention of Petitioner without any showing of necessity bears no reasonable relationship to a legitimate regulatory purpose. Detention under these circumstances is punitive in effect, not regulatory, and therefore violates substantive due process. *Foucha*, 504 U.S. at 80.

C. Arbitrary Executive Detention Without Judicial Review Violates Separation-of-Powers Principles

The writ of habeas corpus exists to prevent arbitrary executive detention. *St. Cyr*, 533 U.S. at 301. Where the Executive claims the authority to detain an individual indefinitely while disclaiming any obligation to provide a mechanism for review, habeas relief is essential.

ICE's position results in unbounded executive detention insulated from both administrative and judicial oversight. Such a regime is incompatible with fundamental constitutional principles. *Boumediene*, 553 U.S. at 783 ("The Framers viewed freedom from unlawful restraint as a fundamental precept of liberty.").

Absent meaningful judicial review, the Executive's detention power exceeds constitutional limits.

D. Exhaustion Is Excused and Habeas Relief Is Required

Exhaustion in § 2241 proceedings is prudential and is excused where administrative remedies are unavailable or futile. Respondents may argue Petitioner must seek bond before the Immigration Court and appeal to the BIA. That remedy is unavailable. Under *Matter of Yajure-Hurtado*, Immigration Judges in this jurisdiction assert they lack bond jurisdiction over individuals DHS classifies under §1225(b)(2). Because Petitioner entered without inspection, DHS categorizes him as falling under §1225(b)(2).

Thus:

- The Immigration Court lacks authority to provide relief.
- Administrative remedies are functionally unavailable.
- Exhaustion would be futile.

A detainee is not required to pursue remedies the agency claims it lacks power to grant.

E. Release Is the Appropriate Habeas Remedy

Where detention violates the Constitution, release is the appropriate remedy. *Zadvydas*, 533 U.S. at 699; *Munaf v. Geren*, 553 U.S. 674, 693 (2008). Courts possess broad equitable authority under § 2241 to order release from unlawful custody.

Because Petitioner's continued detention violates substantive and procedural due process, the writ should issue and Petitioner should be released forthwith.

VI. CLAIMS FOR RELIEF

COUNT I – Unlawful Detention (28 U.S.C. § 2241)

1. Petitioner incorporates all preceding paragraphs.
2. Respondents are detaining Petitioner in violation of the Constitution and laws of the United States.

COUNT II – Declaratory Relief

1. A declaration is warranted that Petitioner's continued detention is unlawful and violates the Due Process Clause of the Fifth Amendment.

VII. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. **Grant this Petition** for Writ of Habeas Corpus;
2. **Order** Respondents to **immediately release** Petitioner from **ICE custody**; or
3. **Declare** that Petitioner's continued detention **violates the Constitution**; and
4. **Grant any other relief** the Court deems just and proper.

Respectfully submitted,

/s/ Rodolfo Castillo
Rodolfo Castillo
Attorney for Petitioner
Texas Bar No. 24000489
Rudy Castillo Law Firm
2621 Rockgate Dr.
San Antonio, TX 78227
Phone: (210) 777-1111
Email: rc@rudycastillolaw.com

VIII. SIGNATURE & VERIFICATION

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

Executed on 02/23/2026

/s/ Rodolfo Castillo
Rodolfo A. Castillo
Attorney for Petitioner

EXHIBITS

1. **Exhibit A** – ICE Detainee Locator record confirming that Petitioner Arianna Del Carmen Pacheco-Melendez () is currently detained at the Karnes County Immigration Processing Center in Karnes City, Texas.
2. **Exhibit B** – Automated Case Information showing that she has master court hearing on February 24, 2025
3. **Exhibit C** – USCIS Temporary Protected Status (TPS) Approval Notice showing TPS validity through April 2, 2025.
4. **Exhibit D** – Copy of Petitioner's Employment Authorization Document (EAD) and Social Security card issued pursuant to her TPS grant.
5. **Exhibit E** – Notice of Hearing from the San Antonio Immigration Court reflecting a Master Calendar Hearing scheduled for March 31, 2027, at 9:00 A.M. CT.
6. **Exhibit F** – Copy of Petitioner's Venezuelan passport
7. **Exhibit G** – Copy of Petitioner's Form I-589, Application for Asylum and Withholding of Removal, bearing the Immigration Court filing stamp, maintained in the ordinary course of representation.
8. **Exhibit H** – Attorney Declaration Authenticating Exhibits A–G.

Exhibit

“A”



Report

Main Menu

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Facility Page

Detention Information For:

ARIANNA DEL CARMEN PACHECO-MELENDZ

Country of Birth: Venezuela

A-Number: 

Current Detention Facility:

KARNES COUNTY IMMIGRATION PROCESSING CENTER

409 FM 1144

NA

KARNES CITY, TX 78118

Visitor Information: (830) 254-2000

[MORE INFORMATION >](#)



ERO Office Information

[Privacy - Terms](#)

Exhibit “B”

 An official website of the United States government
Here's how you know



EOIR Automated Case Information

Court Closures Today February 20, 2026

Please check <https://www.justice.gov/eoir-operational-status> for up to date closures.

Home > **PACHECO-MELENDZ, ARIANNA DEL CARMEN** ()



Automated Case Information

Name: PACHECO-MELENDZ, ARIANNA DEL CARMEN |
A-Number:  | **Docket Date:** 6/25/2021



Next Hearing Information

Your upcoming **MASTER** hearing is on **February 24, 2026** at **8:30 AM**.

JUDGE

Newburn, Irma J.

COURT ADDRESS

566 Veterans Drive
PEARSALL, TX 78061



Court Decision and Motion Information



This case is pending.



BIA Case Information

No appeal was received for this case.



Court Contact Information

If you require further information regarding your case, or wish to file additional documents, please contact the immigration court.

COURT ADDRESS

566 VETERAN DRIVE., SUITE 101
PEARSALL, TX 78061

PHONE NUMBER

(210) 368-5700

[Archive](#)

[Accessibility](#)

[Information Quality](#)

[Privacy Policy](#)

Exhibit

“C”

Receipt Number [REDACTED]	USCIS Account Number [REDACTED]	Case Type I821 - APPLICATION FOR TEMPORARY PROTECTED STATUS
Received Date 05/30/2024	Priority Date 05/30/2024	Applicant PACHECO MELENDEZ, ARIANNA DEL CARMEN
Notice Date 11/20/2024	Page 1 of 2	

PACHECO MELENDEZ, ARIANNA DEL CARMEN c/o ARIANNA PACHECO 8639 FAIRHAVEN ST APT 1208 SAN ANTONIO TX 78229-2463	Notice Type: Approval Notice Valid from: 11/20/2024 to 04/02/2025
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You have been granted Temporary Protected Status (TPS) under section 244 of the Immigration and Nationality Act. The benefits of TPS are temporary protection from removal (or deportation), employment authorization in the United States, and the opportunity to apply for travel authorization.

Attached to this notice is a Form I-94 indicating your Temporary Protected Status in the United States. The I-94 is valid until the expiration date shown on it.

If you requested an employment authorization document (EAD) pursuant to your registration for TPS, you will receive a separate notice containing the decision on that request. If your EAD request is approved, you will be issued an EAD that will be valid until the expiration date shown on the EAD itself. The EAD will serve as evidence of your TPS and employment authorization.

If the TPS designation is extended, you must re-register with U.S. Citizenship and Immigration Services (USCIS) within the time period designated for re-registration. If you wish to obtain an EAD valid for the time period of the extended TPS designation, you must also apply for an EAD during the filing period(s) described in the applicable Federal Register notice (FRN). The FRN notice will provide guidance on required forms and application fees to re-register for TPS and to apply for a new EAD. You should also pay close attention to any future FRNs issued by USCIS regarding your country's TPS, including any information that may be included in such notices about possible automatic extensions of the validity date(s) on EADs.

Failure to re-register during a TPS extension re-registration period may result in the withdrawal of your TPS and may result in removal proceedings being initiated against you.

While you are under Temporary Protected Status, you:

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.

USCIS TSC
U.S. CITIZENSHIP & IMMIGRATION SVC
6046 N Belt Line Rd. STE 114
Irving TX 75038-0015

USCIS Contact Center: www.uscis.gov/contactcenter

PLEASE TEAR OFF FORM I-94 PRINTED BELOW AND STAPLE TO ORIGINAL I-94 IF AVAILABLE

Detach This Half for Personal Records

Receipt [REDACTED]
I-94#
NAME PACHECO MELENDEZ, ARIANNA DEL CARMEN
CLASS

VALID FROM 11/20/2024 UNTIL 04/02/2025

APPLICANT: PACHECO MELENDEZ, ARIANNA DEL CARMEN
8639 FAIRHAVEN ST APT 1208
SAN ANTONIO TX 78229-2463

Receipt Number [REDACTED]
United States Citizenship and Immigration Services

I94 Departure Record

14 Family Name

PACHECO
MELENDEZ

15 First (Given) Name

ARIANNA

16 Date of Birth

17 Country of Citizenship

VZ

Receipt Number	USCIS Account Number	Case Type
		I821 - APPLICATION FOR TEMPORARY PROTECTED STATUS
Received Date	Priority Date	Applicant
05/30/2024	05/30/2024	PACHECO MELENDEZ, ARIANNA DEL CARMEN
Notice Date	Page	
11/20/2024	2 of 2	

(1) will not be removed from the United States;

(2) have work authorization and will be granted evidence of work authorization, if you have submitted an EAD request with the required fee, that is valid until the expiration of the time period designated for your Temporary Protected Status;

(3) will be considered as being in, and maintaining, lawful status as a nonimmigrant for purposes of adjustment of status under section 245 of the Act and for change of status under section 248 of the Act;

(4) will not be considered to be permanently residing in the United States under the code of law;

(5) may be deemed ineligible for public assistance by a state or any political subdivision thereof which furnishes such assistance; and

(6) may not depart the United States without prior approval of the Attorney General of the United States.

PLEASE NOTE: As long as you remain eligible for Temporary Protected Status and you maintain your status by complying with the registration requirements, you will be allowed to remain and work in the United States until the end of the period of the time designated for your Temporary Protected Status.

NOTICE: Although this application/petition has been approved, USCIS and the U.S. Department of Homeland Security reserve the right to verify the information submitted in this application, petition and/or supporting documentation to ensure conformity with applicable laws, rules, regulations, and other authorities. Methods used for verifying information may include, but are not limited to, the review of public information and records, contact by correspondence, the internet, or telephone, and site inspections of businesses and residences. Information obtained during the course of verification will be used to determine whether revocation, rescission, and/or removal proceedings are appropriate. Applicants, petitioners, and representatives of record will be provided an opportunity to address derogatory information before any formal proceeding is initiated.

Please see the additional information on the back. You will be notified separately about any other cases you filed.

USCIS encourages you to sign up for a USCIS online account. To learn more about creating an account and the benefits, go to <https://www.uscis.gov/file-online>.

USCIS TSC
U.S. CITIZENSHIP & IMMIGRATION SVC
6046 N Belt Line Rd. STE 114
Irving TX 75038-0015

USCIS Contact Center: www.uscis.gov/contactcenter

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Detach This Half for Personal Records

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Receipt

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NAME

CLASS

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VALID FROM UNTIL

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APPLICANT:

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PLEASE TEAR OFF FORM I-94 PRINTED BELOW AND STAPLE TO ORIGINAL I-94 IF AVAILABLE

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Receipt Number

United States Citizenship and Immigration Services

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I94 Departure Record

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14 Family Name

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15 First (Given) Name

INTENTIONALLY LEFT BLANK

15 Date of Birth

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17 Country of Citizenship

INTENTIONALLY LEFT BLANK

Exhibit “D”

7 Product Way
Lees Summit, MO 64002

USPS Tracking # eVS

USCIS National Customer Service Center
1-800-375-5283

PACHECO MELENDEZ, ARIANNA DEL CARM
MANUEL DIAZ LAW FIRM PC
5002 WEST AVE
SAN ANTONIO, TX 78213-2463

Date 3/14/2023

IMPORTANT INFORMATION – SAVE THIS NOTICE

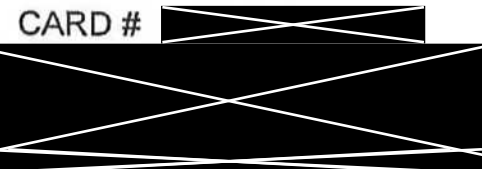
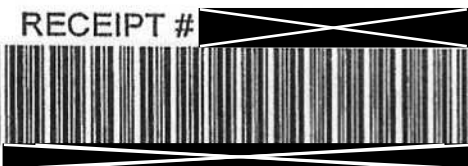
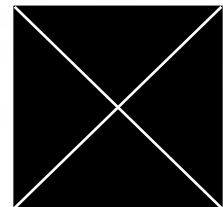
Arianna Pacheco.

Use this tear-off portion to speed your application for an extension or replacement card.

A# [REDACTED]

PACHECO MELENDEZ, ARIANNA DEL CARM
MANUEL DIAZ LAW FIRM PC
5002 WEST AVE
SAN ANTONIO, TX 78213-2463

Scan QR for more
information on
your card, rights,
and benefits.



Help USCIS Serve You Better

We recommend that you keep this notice for your records. It has important information.

The tear-off portion of this notice can help speed your application for an extension or replacement card. When you file for another card, we recommend you attach the tear-off portion to your completed application.

YOUR SOCIAL SECURITY CARD

Keep this stub with your personal records. The other side contains important information.

Please note: The date we issued this card is shown below the signature line.

ADULTS: Sign this card in ink immediately.

CHILDREN: Do not sign until age 18 or your first job, whichever is earlier.

Keep your card in a safe place to prevent loss or theft.

DO NOT CARRY THIS CARD WITH YOU.

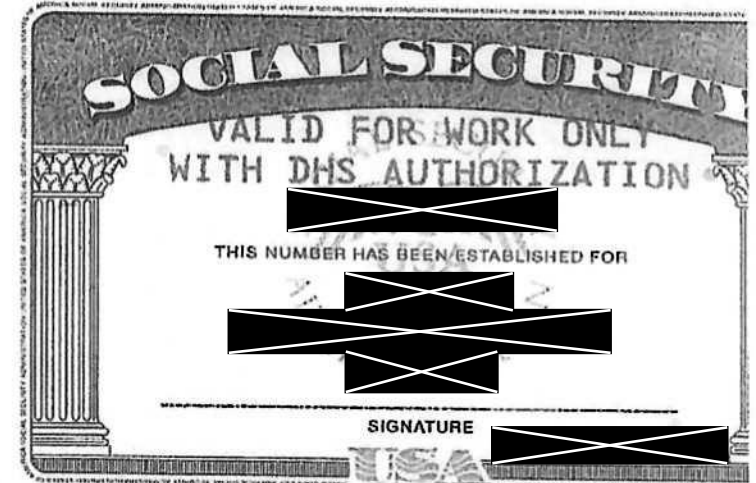
Do not laminate.



ARIANNA PACHECO MELENDEZ



Arianna Pacheco.



Exhibit

“E”

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
SAN ANTONIO IMMIGRATION COURT

AMENDED HEARING NOTICE

LEAD FILE: 
IN REMOVAL PROCEEDINGS
DATE: Mar 20, 2025

TO: Manuel Diaz Law Firm, P.C.
Aguilar, Andrea Melissa
5002 West Ave.
San Antonio, TX 78213

RE:  PACHECO-MELENDZ, ARIANNA DEL CARMEN

Notice of In-Person Hearing

Your case has been scheduled for a MASTER hearing before the immigration court on:

Date: Mar 31, 2027
Time: 09:00 A.M. CT
Court Address: 106 S. ST. MARYS ST. SUITE 600
#4, SAN ANTONIO, TX 78205

Representation: You may be represented in these proceedings, at no expense to the Government, by an attorney or other representative of your choice who is authorized and qualified to represent persons before an immigration court. If you are represented, your attorney or representative must also appear at your hearing and be ready to proceed with your case. Enclosed and online at <https://www.justice.gov/eoir/list-pro-bono-legal-service-providers> is a list of free legal service providers who may be able to assist you.

Failure to Appear: If you fail to appear at your hearing and the Department of Homeland Security establishes by clear, unequivocal, and convincing evidence that written notice of your hearing was provided and that you are removable, you will be ordered removed from the United States. Exceptions to these rules are only for exceptional circumstances.

Change of Address: The court will send all correspondence, including hearing notices, to you based on the most recent contact information you have provided, and your immigration proceedings can go forward in your absence if you do not appear before the court. If your contact information is missing or is incorrect on the Notice to Appear, you must provide the immigration court with your updated contact information within five days of receipt of that notice so you do not miss important information. Each time your address, telephone number, or email address changes, you must inform the immigration court within five days. To update your contact information with the immigration court, you must complete a Form EOIR-33 either online at <https://respondentaccess.eoir.justice.gov/en/> or by completing the enclosed paper form and mailing it to the immigration court listed above.

Internet-Based Hearings: If you are scheduled to have an internet-based hearing, you will appear by video or telephone. If you prefer to appear in person at the immigration court named above, you must file a motion for an in-person hearing with the immigration court at least fifteen days before the hearing date provided above. Additional information about internet-based hearings for each immigration court is available on EOIR's website at <https://www.justice.gov/eoir/eoir-immigration-court-listing>.

In-Person Hearings: If you are scheduled to have an in-person hearing, you will appear in person at the immigration court named above. If you prefer to appear remotely, you must file a motion for an internet-based hearing with the immigration court at least fifteen days before the hearing date provided above.

For information about your case, please call 1-800-898-7180 (toll-free) or 304-625-2050.

The Certificate of Service on this document allows the immigration court to record delivery of this notice to you and to the Department of Homeland Security.

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL[M] PERSONAL SERVICE[P] ELECTRONIC SERVICE[E]
TO: [] Noncitizen | [] Noncitizen c/o Custodial Officer |
[E] Noncitizen ATT/REP | [E] DHS
DATE: 03/20/2025 BY: COURT STAFF BMJ
Attachments: [] EOIR-33 [] Appeal Packet [] Legal Services List [] Other NH

Use a smartphone's camera to scan the code on this page to read the notice online.

Usa la cámara de un teléfono inteligente para escanear el código de esta página y leer el aviso en línea.

Use a câmara do smartphone para digitalizar o código nesta página e ler o manual de instruções online.

使用智能手机摄像头扫描本页面的代码，即可在线阅读该通知。

ਨੋਟਿਸ ਨੂੰ ਔਨਲਾਈਨ ਪੜ੍ਹਨ ਲਈ ਇਸ ਪਤੇ 'ਤੇ ਕੋਡ ਨੂੰ ਸਕੈਨ ਕਰਨ ਲਈ ਸਮਾਰਟਫੋਨ ਦੇ ਕੈਮਰੇ ਦੀ ਵਰਤੋਂ ਕਰੋ।

অনলাইনে নোটিশ পড়ার জন্য এই পজেরে কোডটি স্ক্যান করতে স্মার্টফোনের ক্যামেরা ব্যবহার করুন

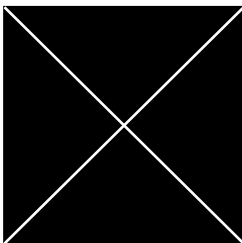
सूचना अनलाइनमा पढ्न यस पृष्ठमा कोड स्क्यान गर्न स्मार्टफोनको क्यामेरा प्रयोग गर्नुहोस्।

Sèvi ak kamera yon telefòn entèlijàn pou eskane kòd ki nan paj sa a pou li avi a sou entènèt.

استخدم كاميرا الهاتف الذكي لمسح الرمز الموجود في هذه الصفحة لقراءة الإشعار على الإنترنت

Чтобы прочитать уведомление онлайн, отсканируйте код на этой странице с помощью камеры вашего смартфона.

Utilisez l'appareil photo d'un téléphone intelligent pour scanner le code sur cette page afin de lire l'avis en ligne.



Exhibit

“F”

REPUBLICA BOLIVARIANA DE VENEZUELA	
PASAPORTE / PASSPORT	
	
	
	OBSERVACIONES COMMENTS
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	
	

Exhibit

“G”



**UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW**

Payment Receipt

A payment has been processed for the following case before the Executive Office for Immigration Review.

For cases before the Immigration Court, please contact the Court that is currently hearing your case for questions regarding payment. For cases before the Board of Immigration Appeals (BIA), please contact the BIA Clerk's Office for questions regarding payment at (703) 605-1007.

A copy of this receipt must be included with the application, motion, or appeal that is filed with the Immigration Court or the BIA Clerk's Office. Failure to include a receipt showing proof of payment will result in rejection of the filing.

A-Number: [REDACTED]

Payment Tracking ID: [REDACTED]

Payment Processed On: 9/30/2025 5:52:39 PM EST

Filing Type: Court - I-589, Application for Asylum (Initial Fee)

Payment Type: PLASTIC_CARD

Payment Amount: \$100.00

Save or print this receipt immediately. A copy will not be sent via email. The tracking ID is required to retrieve a duplicate receipt.

*Please note there is an **annual fee** for all asylum applications, which is due on the anniversary of each calendar year that an alien's asylum application remains pending; no fee-waiver or reduction in fee is permitted. **This fee must be paid timely**; failure to pay within 30 days of the anniversary due date will likely result in pretermission of the asylum application and an order of removal. This will be the only notice that the alien will receive regarding this annual payment requirement. Payment of this fee can be made at <https://epay.eoir.justice.gov/index>.

Current annual fee amounts can be found at www.justice.gov/eoir/types-appeals-motions-and-required-fees.

Exhibit

“H”

ATTORNEY DECLARATION IN SUPPORT OF PETITION FOR WRIT OF HABEAS CORPUS

I, **Rodolfo Castillo**, declare as follows:

1. I am an attorney licensed to practice law in the State of Texas and represent Petitioner Arianna Del Carmen Pacheco-Melendez in the above-captioned matter.
2. Petitioner Arianna Del Carmen Pacheco-Melendez () is currently detained by U.S. Immigration and Customs Enforcement (ICE) at the Karnes County Immigration Processing Center in Karnes City, Texas.
3. The document attached as **Exhibit A** is a true and correct copy of the ICE Detainee Locator record confirming that Petitioner Arianna Del Carmen Pacheco-Melendez is detained at the Karnes County Immigration Processing Center.
4. The document attached as **Exhibit B** is a true and correct copy of the Automated Case Information printout reflecting that Petitioner has a Master Calendar Hearing scheduled for February 24, 2025, maintained in the ordinary course of representation.
5. The document attached as **Exhibit C** is a true and correct copy of Petitioner's Temporary Protected Status (TPS) Approval Notice reflecting TPS validity through April 2, 2025, maintained in the ordinary course of representation.
6. The document attached as **Exhibit D** is a true and correct copy of Petitioner's Employment Authorization Document (EAD) and Social Security card, maintained in the ordinary course of representation.
7. The document attached as **Exhibit E** is a true and correct copy of the Notice of Hearing from the San Antonio Immigration Court reflecting that Petitioner has a Master Calendar Hearing scheduled for March 31, 2027, maintained in the ordinary course of representation.
8. The document attached as **Exhibit F** is a true and correct copy of Petitioner's Venezuelan passport, maintained in the ordinary course of representation.
9. The document attached as **Exhibit G** is a true and correct copy of Petitioner's Form I-589, Application for Asylum and Withholding of Removal, bearing the Immigration Court filing stamp, maintained in the ordinary course of representation.
10. All documents referenced herein are kept and maintained in the ordinary course of my legal practice.

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

Executed on February 23, 2026, at San Antonio, Texas.

/s/ Rodolfo Castillo

Rodolfo A. Castillo

Attorney for Petitioner

CERTIFICATE OF SERVICE

I hereby certify that on this February 23, 2026, I electronically filed the foregoing Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 with the Clerk of the United States District Court for the Western District of Texas, San Antonio Division, using the CM/ECF system which automatically serves counsel for the Respondents.

In addition, a copy of this Petition was served by U.S. Mail upon:

Rose Thompson, Warden, Karnes County
Immigration Processing Center
409 FM 1144
Karnes City, TX 78118

and

Miguel Vergara San Antonio Field Office Director
for Enforcement and Removal
1777 NE Loop 410 Floor 410
San Antonio, TX 78217

and

The Honorable Pam Bondi
Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, NW
Washington, D.C. 20530-0001

Respectfully submitted,

/s/ Rodolfo Castillo
Rodolfo Castillo
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