IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO
APR -3 2026
JEFFREY P. COLWELL
CLERK

Civil Action No. _____
(To be supplied by the court)

ANYI VERONICA SANCHEZ ESCOBAR, [redacted]

v.

WARDEN / ADMINISTRATOR, GEO AURORA ICE PROCESSING CENTER
(Name of warden, superintendent, jailer, or other custodian)

(Note: If you are attacking the validity of a state conviction or sentence and not the execution of your sentence, you must file an application for a writ of habeas corpus pursuant to 28 U.S.C. § 2254. If you are attacking the validity of a judgment entered in a federal court, you must file a motion pursuant to 28 U.S.C. § 2255 in the federal court that entered the judgment.)

APPLICATION FOR A WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

A. APPLICANT INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

Anyi Veronica Sanchez Escobar, [redacted]
GEO Aurora ICE Processing Center
3130 North Oakland Street
Aurora, CO 80010
(Applicant's name, prisoner identification number, and complete mailing address)

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Indicate whether you are a prisoner or other confined person as follows: (check one)

[ ] Pretrial detainee
[ ] Civilly committed detainee
[X] Immigration detainee
[ ] Convicted and sentenced state prisoner
[ ] Convicted and sentenced federal prisoner
[ ] Other: (Please explain)

B. RESPONDENT INFORMATION

Warden / Administrator
GEO Aurora ICE Processing Center
3130 North Oakland Street
Aurora, CO 80010
(Respondent's name and complete mailing address)

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C. STATEMENT OF CLAIMS

State clearly and concisely every claim you are asserting in this action. For each claim, specify the right that allegedly has been violated and all facts that support your claim. If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "C. STATEMENT OF CLAIMS."

CLAIM ONE: Fifth Amendment Due Process / Unlawful Civil Detention under 28 U.S.C. § 2241 and 8 U.S.C. § 1226(a)

Supporting facts:
Applicant is an immigration detainee at GEO Aurora ICE Processing Center. On or about November 14, 2022, she presented herself voluntarily to United States Border Patrol for immigration processing and was later released on parole reflected by Form I-94. She does not currently possess the physical I-94 because her documents were damaged during her first detention, but a photo remains on her phone while she is detained.

Applicant alleges that she has complied with immigration reporting, ISAP / ATD, and court obligations; maintained stable housing and sponsor support in Colorado; and is not a danger, national-security threat, or flight risk. She has now been subjected to repeated civil detention despite that compliance.

Applicant alleges that continued detention without prompt, meaningful, individualized consideration of release or less restrictive alternatives raises serious Fifth Amendment due-process concerns and exceeds lawful custody under 8 U.S.C. § 1226(a). Applicant also faces immediate irreparable harm if transferred outside Colorado or removed before this Court can act. See accompanying verified petition, declaration, and TRO papers.

D. PRIOR APPLICATIONS

Have you ever filed a lawsuit, other than this lawsuit, in any federal court in which you raised or could have raised the claim(s) raised in this action? [ ] Yes [X] No (check one).

If your answer is "Yes," complete this section of the form. If you have filed more than one prior application, use additional paper to provide the requested information for each prior application. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "D. PRIOR APPLICATIONS."

Name and location of court: N/A

Case number: N/A

Type of proceeding: N/A

List the claim(s) raised: N/A

Date and result: (Attach a copy of the decision if available) N/A

Result on appeal, if appealed: N/A

E. ADMINISTRATIVE REMEDIES

WARNING: You must exhaust administrative and/or state remedies before filing an action in federal court pursuant to 28 U.S.C. § 2241. Your case may be dismissed if you have not exhausted administrative and/or state remedies. If additional space is needed to explain exhaustion, use extra paper to do so. Please indicate that additional paper is attached and label the additional pages regarding exhaustion as "E. ADMINISTRATIVE REMEDIES."

Explain the steps you have taken to exhaust administrative and/or state remedies:
Applicant has sought release through immigration custody proceedings and attempted to present supporting materials showing compliance, housing, sponsor support, school records, and community ties.

At a recent custody / bond proceeding, supporting documents were not timely considered because documents sent from detention arrived late. Applicant has continued to comply with immigration reporting and court requirements.

To the best of Applicant's knowledge, no further administrative remedy can provide immediate protection against transfer or removal before this Court can act, and any further administrative steps would be inadequate to prevent irreparable harm.

F. REQUEST FOR RELIEF

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "F. REQUEST FOR RELIEF."

Applicant asks the Court to issue the writ under 28 U.S.C. §§ 2241 and 2243; enjoin transfer outside the District of Colorado or removal while this case is pending; and preserve the Court's ability to decide the petition before any further transfer or removal occurs.

Applicant further asks the Court to order immediate release or release on noncustodial conditions such as reporting, supervision, or ISAP / ATD.

In the alternative, Applicant asks for a prompt individualized custody or bond hearing before a neutral decisionmaker that considers her compliance, stable housing, sponsor support, family ties, lack of danger, lack of flight risk, and the interests of her child. Applicant also requests appointment of counsel if the interests of justice so require and any other just relief.

G. APPLICANT'S SIGNATURE

I declare under penalty of perjury that I am the applicant in this action, that I have read this application, and that the information in this application is true and correct. *See* 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this application: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the application otherwise complies with the requirements of Rule 11.

Anyi Verónica Sánchez Escobar
(Applicant's signature)

03-26-2026
(Date)

(Form Revised December 2017)