Name: KRYLOSOVA ZINAIDA
A# [redacted]
Address: 1705 E. Hanna Rd.,
Eloy, AZ 85131
Eloy Detention Center
PRO SE

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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

KRYLOSOVA ZINAIDA A# [redacted] Petitioner, v. Warden Eloy Detention Center, and Todd M. Lyons, Acting Director, U.S. Immigration and Customs Enforcement, and KRISTI NOEM, Secretary, U.S. Department of Homeland Security, Respondents.	**Case No.** CV26-02866-PHX-RM--MTM **PETITION FOR WRIT OF HABEAS CORPUS**

PETITION FOR WRIT OF HABEAS CORPUS

(Pro Se, 28 U.S.C. §2241)

I. JURISDICTION AND VENUE

1. This Court has jurisdiction pursuant to 28 U.S.C. §2241 because Petitioner is in custody under the authority of the United States in violation of the Constitution and laws of the United States.

2. This Court has jurisdiction over Petitioner's constitutional claims under the Fifth Amendment Due Process Clause.

3. Venue is proper in the District of Arizona because Petitioner is physically detained at Eloy Detention Center, 1705 E Hanna Rd, Eloy, Arizona 85131, which is located within this District.

II. PARTIES

4. Petitioner is Krylosova Zinaida, A# [redacted], a native and citizen of Russia, currently detained at Eloy Detention Center.

5. Respondent Warden is the Warden of Eloy Detention Center, who has immediate physical custody of Petitioner.

6. Respondent Todd M. Lyons is the Acting Director of U.S. Immigration and Customs Enforcement (ICE), responsible for Petitioner's detention.

7. Respondent Kristi Noem is the Secretary of the U.S. Department of Homeland Security (DHS), the agency with legal authority over Petitioner's detention and removal.

III. CUSTODY STATUS

8. Petitioner entered the United States on November, 18th, 2024 and was taken into immigration custody shortly thereafter.

9. Petitioner has been continuously detained since November, 24th, 2024, including detention at Eloy Detention Center without release.

10. As of the filing of this Petition, petitioner has been detained for over 16 months.

11. Petitioner has never received an individualized custody hearing, including a bond – type hearing, at which the government bears the burden of justifying continued detention by clear and convincing evidence.

IV. PROCEDURAL HISTORY

12. On December 13, 2024, the Department of Homeland Security served Petitioner wirh a Notice to Appear (NTA).

13. Petitioner applied for asylum, withholding of removal, and protection under the Convention Against Torture.

14. On July, 15th, 2025, an Immigration Judge, Michael Schnitzer, issued an oral decision denying Petitioner's application for asylum, withholding of removal, and protection under the Convention Against Torture, and ordered her removal to Russia.

15. On August 10th, 2025 following the initial decision issued by Immigration Judge Michael Schnitzer, Petitioner timely filed an appeal of that decision with the Board of Immigration Appeals.

16. That appeal remains pending as of the date of this Petition.

V. GROUNDS FOR RELIEF

CLAIM ONE

Prolonged Immigration Detention Without Adequate Procedural Safeguards Violates Due Process

17. The Fifth Amendment guarantees that no person shall be deprived of liberty without due process of law.

18. Immigration detention, while civil in nature, becomes unconstitutional when it is prolonged and unsupported by adequate procedural protection.

19. Petitioner has been detained for over 16 months, which constitutes prolonged detention.

20. During this period, Petitioner has not received a bond hearing at which:

- the government bears the burden of proof, and
- detention is justified by clear and convincing evidence.

21. Petitioner's continued detention without such safeguards violates the Due Process Clause of the Fifth Amendment.

CLAIM TWO

Continued Detention Is Arbitrary and Not Justified by Any Individualized Findings

22. Petitioner is not detained based on any individualized findings that she poses a flight risk or a danger to the community.

23. Petitioner has no criminal history in either her native Russia or the United States, has incurred no disciplinary infractions during more than fifteen months of deterioration at the Eloy Detention Center, and has consistently cooperated with all immigration authorities and proceedings.

24. Petitioner also has a confirmed sponsor and stable housing immediately available upon release.

25. Despite these substantial mitigating factors, the government has failed to conduct any meaningful individualized assessment of Petitioner's custody status. Instead, Petitioner's detention has been imposed categorically and automatically as a consequence of the prolonged appellate process.

26. Such prolonged detention, absent an individualized showing that confinement is necessary based onPetitioner's specific circumstances, is arbitrary, punitive in effect, and violates the Due Process Clause of the Fifth Amendment.

CLAIM THREE

Risk of Removal Before Habeas Review Constitutes Irreparable Harm

27. Petitioner faces imminent risk of removal to Russia while her BIA appeal remains pending.

28. Removal prior to judicial review of the legality of detention would:

- moot this Petition, and
- cause irreparable harm, including exposure to persecution.

29. Federal courts routinely recognize that removal prior to habeas review constitutes irreparable injury.

30. petitioner's continued detention has also caused significant deterioration in her physical and mental health.

31. Petitioner suffers from ongoing medical and psychological conditions that are exacerbated by prolonged detention, stress, and uncertainty regarding her potential removal. Continued detention places Petitioner at heightened risk of serious and irreparable harm.

32. Petitioner has experienced panic attacks, anxiety, ongoing physical weakness, and constant stomachaches. Also her eyesight has significantly worsened.

VI. RELIEF REQUESTED

WHEREFORE, Petitioner respectfully requests that this Court:

A. Issue a Writ of Habeas Corpus ordering Respondents to immediately release Petitioner; OR

B. In the alternative, order Respondents to provide Petitioner with a prompt, individualized bond hearing before a neutral adjudicator, at which the government bears the burden of justifying detention by clear and convincing evidence;

C. Issue any temporary or preliminary relief necessary to prevent Petitioner's removal while this Petition is pending;

D. Grant such other and further relief as the Court deems just and proper.

VII. VERIFICATION

I, KRYLOSOVA ZINAIDA, declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed on: 20/04/2026

Krylosova Zinaida
Petitioner, Pro Se
Eloy Detention Center
1705 E Hanna Rd
Eloy, AZ 85131

Certificate of Service: Delivered by Mail

I, Krylosova Lincida
(Write your name)

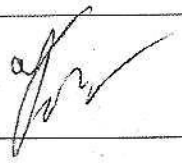
certificate that on the date below I placed a copy in of this document and all attachments in first – class mail to the recipients below:

ICE Field Office
2035 N. Central Avenue
Phoenix, AZ, 85004

Phoenix, AZ 85004 – 4449

U.S. Attorney for the District of AZ
Two Renaissance Square,
40 N. Central Ave., Suite 1800

Warden, detention Center
1705 E Hanna Rd
Eloy AZ 85131
(insert address of the detention center where you are being held above)

Signed: 

Date: 20/04/2026

Day/ Month/ Year