

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Yaniel Gonzalez Garca v. Kevin Raycraft et al.

Gonzalez Garca v. Raycraft · No. 1:26-cv-773 · Decided March 11, 2026

SUMMARY

The United States District Court for the Western District of Michigan dismissed without prejudice an ICE detainee’s 28 U.S.C. § 2241 habeas petition for lack of jurisdiction because the petitioner was not confined within the district. The court also dismissed the petitioner’s motion to consolidate the case with related litigation in the Eastern District of Michigan.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan, Southern Division
WRITING FOR THE COURT	Hala Y. Jarbou
JURISDICTION	United States District Court for the Western District of Michigan, Southern Division
DECIDED	March 11, 2026
DOCKET	1:26-cv-773
DISPOSITION	dismissed
PROCEDURAL POSTURE	Petitioner filed a counseled petition for a writ of habeas corpus under 28 U.S.C. § 2241 challenging his immigration detention and seeking release or a bond hearing. The district court dismissed the petition without prejudice for lack of jurisdiction and dismissed petitioner's motion to consolidate.
STANDARD OF REVIEW	The court applied the jurisdictional limitation in 28 U.S.C. § 2241(a) for a core habeas petition challenging present physical confinement.
PRECEDENTIAL VALUE	unknown
PARTIES	Yaniel Gonzalez Garca v. Kevin Raycraft et al.

TOPICS

- immigration detention
- subject matter jurisdiction
- immigration
- civil procedure

PRACTICE AREAS

immigration detention

federal habeas corpus

federal jurisdiction

QUESTIONS PRESENTED

1. Whether the Western District of Michigan had jurisdiction under 28 U.S.C. § 2241 over a habeas petition challenging petitioner's present physical immigration detention when petitioner was not confined in that district.
2. Whether the court should consolidate the action with a related case pending in the Eastern District of Michigan after determining that it lacked jurisdiction over the habeas petition.

HOLDINGS

1. The court lacked jurisdiction over petitioner's core habeas petition because petitioner was not confined in the Western District of Michigan; jurisdiction lies in the district of confinement.
2. The court denied or dismissed petitioner's motion to consolidate because the court lacked jurisdiction over the underlying habeas petition.

KEY QUOTATIONS

“The plain language of the habeas statute thus confirms the general rule that for core habeas petitions challenging present physical confinement, jurisdiction lies in only one district: the district of confinement.”
(at 2)

“Therefore, because this District is not “the district of confinement,” this Court lacks jurisdiction over Petitioner’s petition for a writ of habeas corpus and will dismiss the petition without prejudice.” (at 3)

FACTUAL BACKGROUND

Petitioner, a Cuban citizen who entered the United States on January 12, 2023, was arrested by ICE agents on December 14, 2025. He was transferred from North Lake Processing Center in Michigan to facilities in Louisiana, Arizona, and Texas, and was in transit when he filed the petition. The ICE Detainee Locator System showed that he was confined in Mahoning County Jail in Youngstown, Ohio at the time of the court's decision.

PROCEDURAL HISTORY

Yaniel Gonzalez Garca filed a § 2241 habeas petition in the Western District of Michigan while detained by ICE. He had been transferred among detention facilities in several states and was not confined in the Western District of Michigan when he filed the petition. The court concluded that jurisdiction over a core habeas petition lies in the district of confinement, dismissed the petition without prejudice, and dismissed his motion to consolidate with a case pending in the Eastern District of Michigan.

DISPOSITION

dismissed

CASES CITED

- Hamdi v. Rumsfeld, 542 U.S. 507, 525 (2004)
- Zadvydas v. Davis, 533 U.S. 678, 687 (2001)
- A. A. R. P. v. Trump, 145 S. Ct. 1364, 1367 (2025)
- Rumsfeld v. Padilla, 542 U.S. 426, 442-443 (2004)

OPINION

Raycraft

PER CURIAM.

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

YANIEL GONZALEZ GARCA,

Petitioner, Case No. 1:26-cv-773 v. Hon. Hala Y. Jarbou KEVIN RAYCRAFT et al., Respondents.

OPINION

Petitioner, a United States Immigration and Customs Enforcement (ICE) detainee currently detained, initiated this action by filing a counseled petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2241. (Pet., ECF No. 1.) For the following reasons, the Court will dismiss Petitioner’s petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2241 without prejudice for lack of jurisdiction. The Court will also dismiss Petitioner’s motion to consolidate cases (ECF No. 4).

Discussion I. Relevant Background Petitioner is a citizen of Cuba, who entered the United States on January 12, 2023. (Pet., ECF No. 1, PageID.8.) On December 14, 2025, Petitioner was arrested by ICE agents. (Id.) He was originally detained at North Lake Processing Center in Baldwin, Michigan. (Id.) However, he was transferred first to Louisiana, and then to Florence, Arizona, Port Isabel, Texas, and back to Florence, Arizona, before being “in transit” at the time that he filed his petition. (Id., PageID.7, 9.) In Petitioner’s § 2241 petition, Petitioner challenges the lawfulness of his current detention and asks the Court to, inter alia, assume jurisdiction over this matter and issue a writ of habeas corpus pursuant to 28 U.S.C. § 2241 either ordering Respondents to release Petitioner or ordering Respondents to conduct a bond hearing to satisfy the requirements of due process. (Pet., ECF No. 1, PageID.25.)

II. Legal Standard The Constitution guarantees that the writ of habeas corpus is “available to every individual detained within the United States.” Hamdi v. Rumsfeld, 542 U.S. 507, 525 (2004) (citing U.S. Const., Art I, § 9, cl. 2). Section 2241 of Title 28 confers the federal courts with the power to issue writs of habeas corpus to persons “in custody in violation of the Constitution or laws or treaties of the United States.” 28 U.S.C. § 2241. This includes challenges by non-citizens in immigration- related matters. See Zadvydas v. Davis, 533 U.S. 678, 687 (2001); see also A. A. R. P. v. Trump, 145 S. Ct. 1364, 1367 (2025). “District courts

are limited to granting habeas relief ‘within their respective jurisdictions.’” *Rumsfeld v. Padilla*, 542 U.S. 426, 442 (2004) (quoting 28 U.S.C. § 2241(a)). “The plain language of the habeas statute thus confirms the general rule that for core habeas petitions challenging present physical confinement, jurisdiction lies in only one district: the district of confinement.” *Id.* at 443. III. Discussion On its face, the petition makes clear that Petitioner was not confined within this District at the time of filing. (Pet., ECF No. 1, PageID.7, 9.) The ICE Detainee Locator System indicates that Petitioner is presently confined in the Mahoning County Jail, located in Youngstown, Ohio. See Online Detainee Locator System, <https://locator.ice.gov/odls/#/search> (enter “A-Number” 244348603; enter “County of Birth,” Cuba, select “Search by A-Number”) (last accessed Mar. 11, 2026). Therefore, because this District is not “the district of confinement,” this Court lacks jurisdiction over Petitioner’s petition for a writ of habeas corpus and will dismiss the petition without prejudice. See 28 U.S.C. § 2241(a); *Rumsfeld*, 542 U.S. at 442. Petitioner has also filed a motion to consolidate this case with Case No. 2:26-cv-10797, filed in the United States District Court for the Eastern District of Michigan. (ECF No. 4.) In his motion, Petitioner acknowledges that “[t]his case was filed with the Western District in error, and due to the urgent nature of the situation, a case was also filed in the Eastern District of Michigan.” (*Id.*, PageID.61–62.) Because this Court lacks jurisdiction over the petition, the Court will also dismiss Petitioner’s motion to consolidate cases. Conclusion For the reasons discussed above, the Court will enter a judgment dismissing Petitioner’s petition for a writ of habeas corpus pursuant to 28 U.S.C. § 2241 without prejudice for lack of jurisdiction. The Court will also enter an order dismissing Petitioner’s motion to consolidate cases (ECF No. 4). Dated: March 11, 2026 / s/ Hala Y. Jarbou

HALA Y. JARBOU

CHIEF UNITED STATES DISTRICT JUDGE