

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)

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