

Anwar Mohamed Jeylani  
A# [REDACTED]  
Northwest Detention Center  
1623 East J Street  
Tacoma, WA 98421-1615

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

Anwar Mohamed Jeylani,

Petitioner,

v.

PAMELA BONDI, Attorney General of  
the United States; KRISTI NOEM,  
Secretary, United States Department of  
Homeland Security; DREW BOSTOCK,  
Seattle Field Office Director, United  
States Citizenship and Immigration  
Services; WARDEN of Immigration  
Detention Facility; and the United States  
Immigration and Customs Enforcement,

Respondents.

No.

PETITION FOR WRIT OF HABEAS  
CORPUS BY A PERSON IN FEDERAL  
CUSTODY PURSUANT TO 28 U.S.C.  
§ 2241

**PETITION**

1. Place of detention:

Northwest Detention Center, 1623 East J Street, Tacoma, Washington 98241-1615, pursuant to a contractual arrangement with my custodian, the ICE Field Office Director at Seattle, Washington.

2. Name and location of court and name of judge who imposed confinement:

ICE Field Director, Seattle, Washington.

3. Case Number or numbers [ICE file number, if known]:

A# [REDACTED]

PETITION FOR WRIT OF HABEAS CORPUS  
(Jeylani v. Bondi, et.al., Case No.) - 1

**FEDERAL PUBLIC DEFENDER**  
1601 Fifth Avenue, Suite 700  
Seattle, Washington 98101  
(206) 553-1100

- 1 4. Date of Order of Confinement:  
2 A. Taken into custody by ICE: March 12, 2024  
3 B. Date of Order of Removal: August 20, 2024  
4 5. Did you appeal from the judgment of conviction or the imposition of sentence:  
5 N/A  
6 6. If you answered "yes" to (5), list  
7 A. The name of each court or administrative tribunal to which you appealed:  
8 N/A  
9 B. The result in each court to which you appealed:  
10 N/A  
11 C. The date of each result:  
12 N/A  
13 D. If known, citations of any written opinions or orders entered pursuant to  
14 such results:  
15 N/A  
16 7. Have you previously filed petitions for habeas corpus, motions under section  
17 2255 of Title 28, United States Code, or any other applications, petitions or  
18 motions with respect to this confinement:  
19 None  
20 8. If you answered "yes" to (7), list with respect to each petition, motion or  
21 application:  
22 A. The specific nature thereof:  
23 N/A  
24 B. The name and location of the court in which each was filed:  
25 N/A  
26

1 C. The disposition:

2 N/A

3 D. The date of such disposition:

4 N/A

5 E. If known, citations of any written opinions or orders entered pursuant to  
6 each such disposition:

7 N/A

8 9. State concisely the grounds on which you base your allegation that you are being  
9 held in custody unlawfully, and the facts which support each of the grounds.

10 **GROUND FOR RELIEF**

11 A. My detention by respondent ICE is in violation of my rights to procedural  
12 and substantive due process, as guaranteed by the Fifth Amendment to the United  
13 States Constitution.

14 B. Because I am seeking relief related only to my custody status, which is  
15 not inconsistent with an order of deportation, exhaustion of administrative remedies, if  
16 any, is not required.

17 C. Because there is not good reason to believe my removal will be  
18 effectuated in the reasonably foreseeable future, ICE has no statutory authority pursuant  
19 to 8 U.S.C. § 1231(a)(6) to detain me. *Zadvydas v. Davis*, 533 U.S. 678 (2001); *Lin*  
20 *Guo Xi v. INS*, 298 F.3d 832 (9th Cir. 2002); *Thai v. Ashcroft*, 366 F.3d 790 (9th Cir.  
21 2004).

22 D. I was taken into ICE custody on March 12, 2024. My order of removal  
23 became final on August 20, 2024. As of today's date, ICE has not been able to  
24 effectuate my removal because my country, Somalia, will not accept my return. I have  
25 done everything that ICE has asked me to do to try to get travel documents and will  
26

1 continue to cooperate fully in the process of getting travel documents. There is nothing  
2 more I can do change Somalia's decision.

3 E. The statute authorizing my detention, 8 U.S.C. § 1231, and related  
4 regulations are unconstitutional as applied to me and others like me. Because ICE's  
5 communications with my country establish no reason to believe I will be deported in  
6 the reasonably foreseeable future, my continued detention is purely a punitive measure  
7 that violates my constitutional rights. *See Wong Wing v. U.S.*, 163 U.S. 228, 237 (1896)  
8 (holding that punitive measures could not be imposed upon immigrants ordered  
9 removed because "all persons within the territory of the United States are entitled to the  
10 protection" of the Constitution).

11 10. Do you have any petition or appeal now pending in any court or administrative  
12 body as to the claims raised above?

13 N/A

14 11. Have you exhausted your administrative remedies with respect to the claims  
15 raised above?

16 7. Have you previously filed petitions for habeas corpus, motions under section  
17 2255 of Title 28, United States Code, or any other applications, petitions or  
18 motions with respect to this confinement:

19 None

20 8. If you answered "yes" to (7), list with respect to each petition, motion or  
21 application:

22 A. The specific nature thereof:

23 N/A

24 B. The name and location of the court in which each was filed:

25 N/A  
26

**PRAYER FOR RELIEF**

Based upon the illegal and unconstitutional actions listed above, I request that the Court grant my petition and direct respondent to release me from custody, as well as any other relief to which I may be entitled in this proceeding under 28 U.S.C. § 2241.

I verify, under penalty of perjury, that the foregoing information is true and correct to the best of my recollection.

DATED this 2<sup>nd</sup> day of January, 2025.

Respectfully submitted,



[SIGN NAME]

Anwar Mohamed Jeylani

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Northwest Detention Center  
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Tacoma, WA 98421-1615

In Propria Persona