

Preliminary Injunction/Temporary Restraining Order

T.R.O

I ask this court to find that my detention is unreasonable and/or unlawful. I also ask this court to enjoin ICE - from detaining me and immediately release me from immigration detention as I am a lawful and loyal United States Citizen. My currently detention is putting my life at danger and imminent risk as I am currently being targeted by MS-13 gang members because of my disobedience to their prison rules. ICE has not separated me from them as there was no security to ensure that they discontinue to harass me on a daily basis. I live with them in the same general population. My life is at danger.

RECEIVED

MAR 04 2025

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

I am more than likely that my habeas corpus will get granted because I'm a US citizen. USCIS error in my denial letter will eventually get correct because I already appeal their error decision. My appeal is pending with USCIS appeal board. Additionally, I would like this court expeditiously enjoin ICE from detaining me not only because I am a US citizen but also due to ICE and Geo's neglect in providing me with the essential medical needs that I mentioned in my habeas grounds to my unlawful detention. The multitude of excessive and brutal force that Geo has subjected me into are too tremendous and harmful to my well being so I am asking this court to render me immediate release as these injuries cannot be compensated through monetary damage. Geo use of chemical agent on my already partially blind eye has made my seeing deficiency four fold. Finally, I am asking this court to direct USCIS to make or issue me my certificate of citizenship as their delay in determining my citizenship has a direct impact on ICE reason to detain me for not having in possession my ~~my~~ US citizen certificate.