

UNITED STATES DEPARTMENT OF JUSTICE

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

ALEXANDRIA DIVISION

RECEIVED
U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

APR 07 2025

EDDIE CARROLL

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Petitioner,

*

BY: DANIEL J. MCCOY, CLERK

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CIVIL DOCKET NO: 1:25-cv-00376-JE-JPM

V.

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*

Department of Homeland Security

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Respondent,

*

ON BEHALF OF PETITIONER: PRO SE

AMENDED MOTION FOR JURISDICTION AND VENUE

COMES NOW, the petitioner Eddie Carroll by and through Pro Se moves this Honorable court to grant a Writ of habeas Corpus pursuant to 28 U.S.C. 2241 to further remedy his continued detention that is unconstitutional, as grounds petitioner respectfully state the following:

SUMMARY OF EVENT

1. On April 26th 2024. The petitioner voluntarily signed and waived his right to appear before an immigration Judge to expedite his removal upon completion of prison term.
2. On Aug., 22 2024, the department of Homeland Security took petitioner into custody and initiated removal proceedings.

3. The petitioner has cooperated with the DHS to effectuate his removal including giving ICE agents relevant documentation to show petitioner is a native and citizen of Bahamas.
4. The petitioner also gave a sworn affidavit to the Consulate Jenifer Johnson of Bahamas.
5. On Aug., 1 2024. The DHS sent a Notice to alien of file custody, on oct, 4ht 2024 the DHS reviewed petitioners' custody and, on that Jan., 03 2025 the DHS arrived at the decision to continue detention, it is important for this Honorable court to note that the petitioner has assisted the DHS to effectuate removal including submission of relevant documentation.
6. The petitioner has served his prison term and now ICE continue to deprive him his right to liberty in violation of petitioner's constitutional right. Because respondent has continued to imprison petitioner, he is entitled to relief requested. U8
7. On March, 25 2025 the Clerk's office issued an Electronic Jurisdictional review finding. Reviewing the pleadings respectively.

JURISDICTION AND VENUE

This action arises under the Constitution of the United States as well as the Immigration and National Act (INA) 8 U.S.C. 1101 et seq., as amended by the Illegal Immigration Reform and the Administrative procedure Act (APA), 5 U.S.C. 701 et seq.

This Court has jurisdiction under 28 U.S.C. 2241; Art, 1 & 9, Cl. 2 of the United States. Constitution (Suspension Clause ""); 28 U.S.C 1331, as the petitioner is presently inn the custody under color of the authority of the United States; and the fifth Amendment of the United States Constitution, and *Zadvydas v. Davis*, 533 U.S 678, 121 S. Ct. 2491 (2001), as he challenges his continued detention. This Court may grant relief pursuant to 28n U.S.C. 702 and the ALL-WRITS Act, 28 U.S.C. 1651.

The petitioner has exhausted any and all available administrative remedies to the extent required by law.

Venue is proper and lies in the United States Court of the Western District of Louisiana because a substantial part of the events or omissions giving rise to the claim arose in this judicial District. See 28 U.S.C 1391 (e), and 28 U.S.C. 2241, et seq. pursuant to *Braden v. 30th Judicial Circuit of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court of Western District of Louisiana which is the Judicial district in which petitioner resides and currently in Immigration custody.

PRAYER FOR RELIEF

WHEREFORE, the promises considered, the Petitioner prays that this Honorable court grant the following relief:

1. Assume Jurisdiction over this matter;
2. Grant a Writ of Habeas Corpus directing the Respondent to immediately release petitioner from detention.
3. Enter preliminary injunction and permanent injunction relief enjoying Respondents from further unlawful detention.
4. Grant any other further relief this Honorable Court see fit and proper under the Law.

5.

I affirm, under penalty of perjury that the foregoing is true and correct.

Respectfully Submitted, this 31 Day of March, 2025.

Eddie Carroll

Eddie Carroll
830 Pine Hill Rd,
Jena, LA 71342.

CERTIFICATE OF SERVICE

I, Eddie Carroll, HEREBY CERTIFY, that a true copy and correct copy of the foregoing **AMENDED MOTION FOR JURISDICTION AND VENUE** also, for a court stamped copy be mailed back to me and to be served by regular mail to the following parties in said action by placing the above in an envelope and mailing said envelope to the addresses so set forth below:

Department of Homeland Security
830 Pinehill Rd,
Jena, LA 71342.

Eddie Carroll
830 Pinehill Rd,
Jena, LA 71342.

I, declare under penalty of perjury of the United States that the foregoing is true and correct.

Eddie Carroll

Eddie Carroll

Dated: 03/31/2025.