

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA
JOHNSTOWN DIVISION**

BEYENE TEWODROS DANIEL,)
Petitioner,)

Civil Action No. 3:25-00098-CBB

Vs.)

LEONARD ODDO, et al.)
Respondents,)

FILED

JUL 15 2025

CLERK U.S. DISTRICT COURT
WEST DIST OF PENNSYLVANIA

TEMPORARY RESTRAINING ORDER

On March, 2025, pro se Petitioner filed a Petition for Writ of Habeas Corpus. Presently before the Court is Petitioner's "Motion for Temporary Restraining Order, Immediate Release Pursuant to Lucas v. Hadden, and/or Order to Show Cause" (the "T.R.O Motion"), which he filed on March, 2025. on June 18,2025 petitioner was transported to Dulles International Airport and asked to board a flight without any travel document being shown to Ethiopia or in the alternative to El salvador. Furthermore were threatened by David O'Neal field office supervisor that I would be forced on charter flight next week. upon his questioning to see travel document they claimed that I refused to board one and transported me back to Moshannon valley and this is the reason why I ask for the TRO.

I. Factual Background

Petitioner was born in Ethiopia, and Later self Naturalized In The Republic Of New York as a Freeman living being who lives in the land of the free and currently have no deportation order standing,If ICE/DHS claim there is one order them to show any certified copy of such order that does not exist on record. Furthermore petitioner is a beneficiary of an I-130 (Petition for immediate family member) which was petitioned by his wife now being adjudicated ,for DHS/ICE contention to say that I need to show proof of such file exists is circumventing the process in which they are well aware of and in their

possession and cannot be said that I have no proof of such claim. Petitioner who has been detained in the custody of the United States Immigration and Customs Enforcement ("ICE") Since February 11, 2025 at the Moshannon valley Processing Center with No Notice to appear. With the TRO Motion, Petitioner seeks (i) "a temporary restraining order or preliminary injunction requiring Respondents to release Petitioner," (ii) the Court to "[o]rder Petitioner released from Respondent's custody," (iii) the Court to "[o]rder Respondents to show cause why Petitioner's Verified Petition should not be expeditiously granted," (iv) Require respondent to show verified and certified deportation order from immigration court as the court has no record per their record. (See. Exhibit A) (v) as ICE/DHS claimed multiple non-factual events as to petitioners detention. This court should ask clarification and documents supporting their claim vi) The court to order defendant ICE/DHS from executing a charter flight being executed forcefully without consent as they vowed to execute this month and/or (vii) the Court to "[g]rant Petitioner such other, further and additional relief as the Court deems just and appropriate."

("DHS"), the DHS, Christie Noem , Attorney General of the United States, the Director of the Philadelphia Field Office of ICE, Warden Leonard Oddo of Moshannon Valley Processing Center, and David O'Neill, Deputy Field Office Director of the Philadelphia Field Office of ICE and deportation Officer Z.Philips has been non- responsive to all Administrative remedies that are available and requested by simply assuming that final order of deportation which does not exist on record is the reason why for their detention and claim of aggravated crime (See. Attached Exhibit B).Petitioner petitioned the Elizabeth immigration court to see if he is eligible for bonds However the court returned the document stating that there is no record that ICE/DHS filed a Notice to appear and they rejected my filing (See. Exhibit C).

Since this court gave the order on May 6th to show cause I was rushed to the elizabeth court On May 8th with out proper notice in which I received the notice to the court hearing after I had the hearing for a bond request on may the 8th after the hearing in which it was marked that it was delivered on April 30th,2025 which was far from the truth I attached the mail log for the month of April and notice to the hearing (see. Exhibit D).This mack like hearing deny right to notice and right to ask the judge the reason why I have been escorted to the court room upon requesting the reason why the judge claimed that I requested for a bond hearing I responded by saying I have a document here that says the bond request was rejected all of a sudden I became eligible to request for a bond hearing after this courts order and Ice never gave me any notice to appear nor the court stated that they received any charging documents from ICE ,after this brief encounter the judge indicated that my bond request was denied with out my consent to attend the proceeding as that was a blatant denial of due process in so many level.

It has been claimed several times by several representative from ICE that they are in the process of obtaining a travel documents to effectuate my removal to Ethiopia that was the reason they revoked Parole and abducted me from my jurisdiction with out any warrant or valid cause to justify their abduction. However The Consulate Of Ethiopia has never received any travel document request from any authority from the United States and affirmed that they will not be able to obtain one in the near future as I do not exist in their system. Since my Unusual and cruel punishment continues to exist with out a cause and to no ending in the for see able future ,Affiant attest to the consulate affirmation of this conversation on April 26,2025 on a recorded facility telephone and can be used as an evidence as (ICE/GEO) have access to such conversation ,affiant consent to this information to be shared to this court if need be and ICE can provide such recordings. when I spoke to the Ethiopian consulate Representative on that day it has not been received nor requested through any channel as it was claimed

by ICE/DHS representatives. Given that one has an Ethiopian passport this process will take upwards of two years in a normal circumstances to obtain a travel document affiant never had an Ethiopian passport nor received any travel document from Ethiopia upon his abrupt exit at the age of eleven. As ICE/DHS has been abducting and removing individuals through an emergency travel document that are being purchased from the dark web being utilized in these illegal abduction and deportation of citizens, Now it is confirmed that ICE/DHS purchased this one day travel pass from an online source in which they paid more than what the Ethiopian government charge. I ask them to show receipt that it was obtained from this government, furthermore this does not show any nationality nor citizenship and it is a one time entry only pass it can not qualify one for a passport or any travel document . TRO is the only remedy that will prevent this administration from expelling one illegally with apparent fraudulent documents which has been their current form of removal practice which is illegal and unlawful outright a violation of due process. Furthermore, this current administration needs to be stopped from illegally incarcerating individuals with out obtaining a travel document as Redetention is an outright violation of due process with out a cause and deporting them without due process as I have beneficiary interest on multiple properties, and immediate families in the Republic Of New York .

Petitioner request any and all relief to be granted with this (TRO) as there is newly found evidence and previously submitted petition as this court finds just and proper.

Respectfully

Beyene Tewodros Daniel

CERTIFICATE OF SERVICE

On June 27^h, 2025 I BEYENE TEWODROS DANIEL, Served a copy of this Petition to the Office Of
Chief Immigration & Customs Enforcement, 2350 Freedom Way, Suite 254, York, PA 17402

BEYENE TEWODROS DANIEL

06/27/2025