

AO 242 (12/11) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT

for the

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APR 18 2025

CLERK, U.S. DISTRICT COURT
MINNEAPOLIS, MINNESOTA

Raymond James Morley

Petitioner

President: Donald J. Trump (USA)
Secretary: Kristi Noem and Cassandra Bly (DHS)

Respondent

(name of warden or authorized person having custody of petitioner)

Case No.

25-cv-01580-KMM-JFD

(Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: Raymond James Morley
 (b) Other names you have used: _____
 2. Place of confinement:
 (a) Name of institution: Sherburne County Jail
 (b) Address: 13880 Business Center Drive, NW, Suite 200
EIK River, MN 55330
 (c) Your identification number: [REDACTED]
 3. Are you currently being held on orders by:
 Federal authorities State authorities Other - explain:
DHS/ICE custody
 4. Are you currently:
 A pretrial detainee (waiting for trial on criminal charges)
 Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
 If you are currently serving a sentence, provide:
 (a) Name and location of court that sentenced you: _____
 (b) Docket number of criminal case: _____
 (c) Date of sentencing: _____
- Being held on an immigration charge
 Other (explain): _____

SCANNED
APR 18 2025
U.S. DISTRICT COURT MPLS

Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Instructions

1. Petitions brought under 28 U.S.C. § 2241 usually involve one of the following situations:
 - a. A federal prisoner believes that the Bureau of Prisons (“BOP”) has wrongly computed his or her release date;
 - b. A federal prisoner believes that the BOP has wrongly taken away some of his or her “goodtime credits” to extend the duration of confinement;
 - c. A federal prisoner is seeking an expedited transfer to a “residential re-entry center” or “half way house;”
 - d. A person is in federal or state custody because of something other than a judgment of conviction (such as, pretrial detention or awaiting extradition); or
 - e. A person is being detained by federal immigration authorities while awaiting deportation.
2. Answer each question on the form with legible handwriting or have it typewritten. The form must be signed as instructed on the last page of the form.
3. Every petition for habeas corpus must be sworn to under oath. Therefore, any false statement of material fact provided on the form may serve as a basis of prosecution and conviction for perjury. Petitioners should exercise due care to assure that all answers are true and correct.
4. To start a case under 28 U.S.C. § 2241, the petitioner must submit the following to the Clerk’s Office:
 - a. A completed Petition for Writ of Habeas Corpus Under 28 U.S.C. § 2241 form.
 - b. A completed Civil Cover Sheet.
 - c. The \$5.00 filing fee **OR** request to waive the filing fee by submitting a completed Application to Proceed in District Court without Prepaying Fees or Costs form (IFP).
5. When you have completed the form, send the signed original to the following address:

United States District Court, District of Minnesota Clerk’s Office
Diana E. Murphy United States Courthouse
300 South Fourth Street, Suite 202
Minneapolis, MN 55415

(612) 664-5000
6. The Court has a Pro Se Guidebook for Petitions for Writ of Habeas Corpus Under 28 U.S.C. § 2241 that you may consult for additional information. You may obtain a copy of this Guidebook by contacting the Clerk’s Office at the contact information provided above.

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Decision or Action You Are Challenging

5. What are you challenging in this petition:

How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

Pretrial detention

Immigration detention

Detainer

The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)

Disciplinary proceedings

Other (explain): Since 8/26/2024 DHS/ICE has held me in custody. It is without allowing me access to evidence in my cellphone. Plus, I have been abused by detainees and officials.

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: DHS/ICE: Kandiyohi County Jail and Sherburne County Jail. Minnesota

(b) Docket number, case number, or opinion number: _____

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):

Prolonged detention, Due Process, Cruel and Unusual Punishment, Depression, Abuse of Discretion, Material Evidence, Current Legal Status Because of Waiver Program: Bahamians with valid passports do not need U.S. visas.

(d) Date of the decision or action: December 3rd, 2024

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: Board of Immigration Appeal, Enforcement and Removal Operation (ICE), Department of Homeland Security

(2) Date of filing: 10/ October 25, 2024

(3) Docket number, case number, or opinion number: [REDACTED]

(4) Result: Denied

(5) Date of result: January 16, 2025

(6) Issues raised: Prolonged Detention on the grounds of Constitution, Civil Rights Violation, Human Rights Violation. Deprivation of life, property, liberty and fundamental due process under the law. Fourteenth Amendment Discretionary Powers: Valid Passports. Fifth Amendment, Universal Human Rights

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[8 U.S.C. 1226]

(b) If you answered "No," explain why you did not appeal:

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court: Board of Immigration Appeal, Department of Homeland Security and ICE and Immigration Judge
- (2) Date of filing: December 2024, January 2025 and February 2025
- (3) Docket number, case number, or opinion number: _____
- (4) Result: No Response
- (5) Date of result: No Response
- (6) Issues raised: Prolonged Detention: Constitution Violation, Civil Rights Violation and Human Rights Violation. Deprivation under the law of life, liberty and property. Cruel and Unusual Punishment. Lack of Due Process. Abuse of Discretion. Subpoena Authority: Eight Amendment, Fourteenth Amendment, Fifth Amendment and Universal Human Rights Declaration. Case laws [8 U.S.C. 1226]

(b) If you answered "No," explain why you did not file a second appeal:

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court: President: Donald J. Trump, DHS ERO and ICE, Board of Immigration Appeal
- (2) Date of filing: January 20, 2025; March 2025
- (3) Docket number, case number, or opinion number: _____
- (4) Result: No Response
- (5) Date of result: No Response
- (6) Issues raised: Help and Protection Under U.S. Law. from removal or deportation to a country where I suffered torture as well as persecution. Constitutional Rights, Civil Rights, human Rights, Case laws

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Prolonged detention, Cruel and Unusual Punishment, Valid Passport, No Criminal record or flight risk or threat to society. United Nation Protected Person Status. Due Process: Fourteenth Amendment; Fifth Amendment; Universal Declaration of Human Rights

(b) If you answered "No," explain why you did not file a third appeal: _____

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

Yes No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

Yes No

If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

Yes No

If "Yes," provide:

- (1) Name of court: _____
- (2) Case number: _____
- (3) Date of filing: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

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(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence:

11. Appeals of immigration proceedings

Does this case concern immigration proceedings?

Yes No

If "Yes," provide:

(a) Date you were taken into immigration custody: August 26, 2024

(b) Date of the removal or reinstatement order: December 3, 2024

(c) Did you file an appeal with the Board of Immigration Appeals?

Yes No

If "Yes," provide:

(1) Date of filing: December 16, 2024

(2) Case number: [REDACTED]

(3) Result: Pending

(4) Date of result:

(5) Issues raised: Convention Against Torture, Official Oppression, Miscarriage of Justice, Withholding of Removal, DHS/ICE's Subpoena Authority: they refuse to grant me access to evidence in my cellphone. The people who forced me to flee to America stole my company, identity, property and tried to murder me. There is material proof inside my cell phone to substantiate my claims in these immigration proceedings. Case laws: [Zadvydas v. Davis] [8 U.S.C 2241] Attempted murder, Being Robbed, Exploitation, Police Brutality

(d) Did you appeal the decision to the United States Court of Appeals?

Yes No

If "Yes," provide:

(1) Name of court:

(2) Date of filing:

(3) Case number:

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- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____
- _____
- _____
- _____
- _____

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

Yes No

If "Yes," provide:

(a) Kind of petition, motion, or application: _____

(b) Name of the authority, agency, or court: _____

(c) Date of filing: _____

(d) Docket number, case number, or opinion number: _____

(e) Result: _____

(f) Date of result: _____

(g) Issues raised: _____

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground.

GROUND ONE: Violation of the constitution: Prolonged Detention, Cruel and Unusual Punishment, Lack of Due Process. Fifth Amendment, Eighth Amendment Fourteenth Amendment, Universal Declaration of Human Right, Convention Against Torture and Degrading Treatment, Deprivation, Abuse of Discretion

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(a) Supporting facts (Be brief. Do not cite cases or law.):

During the time I have been in DHS/ICE custody I have requested release because I pose no threat nor am I a flight Risk. The letters I wrote were sent to departments, courts, agencies and the President because of their discretionary powers.

(b) Did you present Ground One in all appeals that were available to you?

Yes No

GROUND TWO: Prolonged Detention and Lack of Due Process Abuse of Discretion and Powers. Universal Declaration of Human Rights

(a) Supporting facts (Be brief. Do not cite cases or law.):

I have been travelling to the United State for over thirty (30) years. Also, with and without visas. For work and pleasure. Currently I am a United Nation Protected Person. I gave my proof of status. Being a single father I am being deprived of access and ability to protect my children. Business owner and witness to crimes and victim of crimes of violence

(b) Did you present Ground Two in all appeals that were available to you?

Yes No

GROUND THREE:

(a) Supporting facts (Be brief. Do not cite cases or law.):

(b) Did you present Ground Three in all appeals that were available to you?

Yes No

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GROUND FOUR:

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

(b) Did you present Ground Four in all appeals that were available to you?

Yes No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

Request for Relief

15. State exactly what you want the court to do: My desire is to obtain: Habeas Corpus relief. I want to be released from jail. Getting an injunction against DHS/ICE for: Civil Rights Violations, Abuse of Discretion, Protection Against Deportation. Investigate My Claims of Abuse While in Detention. I need the Court to appoint a lawyer to my case because I have been abused by the system in more than one instance. Ensure that I am treated fairly and justly.

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Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

April 13th, 2025

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 04/14/2025



Signature of Petitioner

Signature of Attorney or other authorized person, if any