

Alula Fantaye HAGOS Petitioner A# [REDACTED]

SA-25-CV-00447-JKP

Memorandum

1. Petitioner is the physical OF Respondent and detained at the South Texas ICE Processing Center.

2. The authority OF ICE detain non citizen under Federal law derives from 8 USC § 1231 which directs the Attorney General OF the United States to affect the removal OF any non citizen from the country with 90 days OF any order OF removal 8 USC § 1231 (a) (1). However, once that time passes and after "removal is no longer - reasonably foreseeable continued detention is no longer authorized by statute" the non citizen must be released. Zadvydas v. Davis 533 US 678, 699, 121 S Ct 2491, 150 L. Ed. 2nd 653 (2001)

3. UNLAWFUL redetention in Violation 8 CFR 241.13 (i) (2) 1231 (a) (6).

4. violation OF the Immigration and nationality Act OF 1952. (INA)

5. Unconstitutionally indefinite detention in Violation OF the procedural due process rights under the Fifth Amendment to United States Constitution... to Final Order OF removal must comply with certain conditions OF release 8 U.S.C. § 1231 (a) (3) (6)

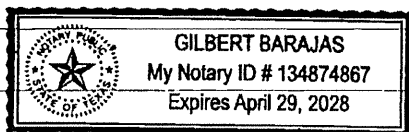
FILED
SEP 17 2025

U.S. DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
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6 Yes, Non Citizens, even those Subject to a Final removal Order have Constitutional right Just Like everyone else in the United States.

See *Zadvydas v. Davis* 533 US 678 693 121 S.Ct 2491, 150 LEd 2d 653 (2001)

7. Petitioner Found myself in dangerous - conditions Feared for my Life returned to other than my countries. They trying removing Costa Rica, El Salvador panama Ethiopia. I Fear of my Life!



Executed
9/13/2025

Alula F Hagos

Alula F HAGOS

A# [REDACTED]

ALVA FORTNEY HOGGOS A#044218148
A#
South Texas ICE Processing Center
566 Veteran DR
Pearsall TX 78061

RECEIVED

SEP 17 2025

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