

## CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

## I. (a) PLAINTIFFS

HUSSEIN "MIKE" ALI YASSINE

(b) County of Residence of First Listed Plaintiff  
(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

Sarah Chen, Texas Civil Rights Project, PO Box 17757,  
Austin, TX 78760 (See Attachment A)

## DEFENDANTS

CHARLOTTE COLLINS, Warden at the T. Don Hutto  
Residential Center, et alCounty of Residence of First Listed Defendant Williamson County  
(IN U.S. PLAINTIFF CASES ONLY)NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF  
THE TRACT OF LAND INVOLVED.

Attorneys (If Known)

## II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☐ 1 U.S. Government Plaintiff ☐ 3 Federal Question  
(U.S. Government Not a Party)
- ☒ 2 U.S. Government Defendant ☐ 4 Diversity  
(Indicate Citizenship of Parties in Item III)

## III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- |   | PTF                        | DEF                        |   | PTF                        | DEF                        |
|---|----------------------------|----------------------------|---|----------------------------|----------------------------|
| Citizen of This State                   | <input type="checkbox"/> 1 | <input type="checkbox"/> 1 | Incorporated or Principal Place of Business In This State     | <input type="checkbox"/> 4 | <input type="checkbox"/> 4 |
| Citizen of Another State                | <input type="checkbox"/> 2 | <input type="checkbox"/> 2 | Incorporated and Principal Place of Business In Another State | <input type="checkbox"/> 5 | <input type="checkbox"/> 5 |
| Citizen or Subject of a Foreign Country | <input type="checkbox"/> 3 | <input type="checkbox"/> 3 | Foreign Nation  | <input type="checkbox"/> 6 | <input type="checkbox"/> 6 |

## IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	<b>PERSONAL INJURY</b> <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice <b>PERSONAL INJURY</b> <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability <b>PERSONAL PROPERTY</b> <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other <b>LABOR</b> <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act <b>IMMIGRATION</b> <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 <b>INTELLECTUAL PROPERTY RIGHTS</b> <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 <b>SOCIAL SECURITY</b> <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) <b>FEDERAL TAX SUITS</b> <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
<b>REAL PROPERTY</b> <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<b>CIVIL RIGHTS</b> <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education <b>PRISONER PETITIONS</b> <input checked="" type="checkbox"/> Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <b>Other:</b> <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

## V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

## VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):  
28 U.S.C. 2241

Brief description of cause:

Petitioner challenges his immigration detention as a violation of the U.S. Constitution and federal law

## VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

## DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

## VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

5/23/2025

SIGNATURE OF ATTORNEY OF RECORD

/s/ Erin Thorn

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

**ATTACHMENT A**

**Item I (c) – Attorneys (Firm Name, Address, and Telephone Number)**

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*Attorneys for Petitioner Hussein "Mike" Ali Yassine*

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

HUSSEIN “MIKE” ALI YASSINE,

*Petitioner,*

v.

CHARLOTTE COLLINS, Warden at the T. Don  
Hutto Residential Center; VINCENT  
MARMOLEJO, Assistant Field Office Director,  
ICE San Antonio Field Office; MIGUEL  
VERGARA, Field Office Director, ICE San  
Antonio Field Office; TODD LYONS, Acting  
Director, United States Immigration and Customs  
Enforcement; KRISTI NOEM, Secretary of  
Homeland Security; PAMELA BONDI, United  
States Attorney General, *in their official capacities,*

*Respondents.*

Civil Action No.: 25-cv-00786

**PETITION FOR A WRIT OF  
HABEAS CORPUS  
PURSUANT TO 28 U.S.C. §  
2241**

**PETITION FOR A WRIT OF HABEAS CORPUS**  
**PURSUANT TO 28 U.S.C. § 2241**

**I. INTRODUCTION**

1. This case is about the authority of U.S. Immigration and Customs Enforcement (“ICE”) to detain a vulnerable individual whom it has failed to deport for over four years. Petitioner Hussein Ali Yassine is a 53-year-old man born in Ivory Coast to Lebanese parents. He has spent nearly 36 years in the United States. Most of those years were as a lawful permanent resident (“LPR”), business owner, and devoted partner. In 2020, an immigration judge revoked his LPR status and entered a removal order against him. Despite this final order of removal, Mr. Yassine is stateless. When officials attempted to remove him to either Ivory Coast or Lebanon following this order, neither would issue him proof of citizenship or travel documents.

2. During Mr. Yassine's first time in ICE custody in El Paso, Texas in 2020 and 2021, the government failed to remove him, and his mental health declined rapidly. After planning and nearly carrying out a suicide attempt in an ICE detention center, he was transferred to a mental health treatment facility. Because his mental health declined precipitously when he was transferred back to a detention center, ICE housed Mr. Yassine in mental health treatment facilities for the nearly the entire remainder of his initial detention. He was released on ICE Orders of Supervision in January 2021.
3. Since his release, Mr. Yassine has faithfully checked in with ICE every week by submitting photos, and every year by visiting his local ICE office. He has abided by his supervision requirements and has built a life in Austin, Texas with a stable job, live-in partner, and a therapy and emotional support dog, a thirteen-year-old German Shepherd named Alex. This stable support system allows Mr. Yassine to effectively manage his depression.
4. Mr. Yassine has attempted to remedy his stateless status by contacting officials at the Embassies of Ivory Coast and Lebanon. Despite his good-faith efforts, neither country has recognized his citizenship or issued him travel documents.
5. At an in-person ICE check-in on March 3, 2025, an ICE officer took photos of Mr. Yassine. This was purportedly to help obtain travel documents, despite past failed attempts to obtain such documents from either Ivory Coast or Lebanon.
6. On April 1, 2025, Mr. Yassine received a request to return to the ICE field office on April 3, 2025. When he arrived for the meeting, ICE officers summarily detained him. One of the officers detaining Mr. Yassine told him that that they (ICE) did not yet have travel documents for Mr. Yassine and that his removal was unlikely, but that they were "getting pressure from

Washington to make arrests.” Officials did not provide Mr. Yassine with an opportunity to respond to the reasons his supervised release was being revoked.

7. Since on or about April 3, 2025, Respondents and their agents have detained Mr. Yassine at the T. Don Hutto Residential Center (“Hutto”) in Taylor, Texas. Mr. Yassine’s mental health is once again deteriorating in immigration detention. *See* Ex. 1 (Yassine Medical Records) at 8, 21, 34, 37, 38, 74, 80, 101, 103, 124 (under seal).
8. Respondents and their agents have given no explanation for Mr. Yassine’s re-detention after years of complying with supervised release requirements, beyond a change in Presidential administrations. Most importantly, officials have given no indication that they have made progress on obtaining travel documents to facilitate his removal to either Ivory Coast or Lebanon.
9. Respondents and their agents have provided no indication to Mr. Yassine that there is a significant likelihood of his removal in the reasonably foreseeable future. Due to his stateless status and no change in the circumstances that make Mr. Yassine’s removal unforeseeable, his detention serves no legitimate governmental purpose, and is therefore unlawful.
10. Mr. Yassine challenges his indefinite re-detention as a violation of the Immigration and Nationality Act (INA), as well as his rights under the Due Process Clause of the Fifth Amendment.
11. Mr. Yassine respectfully requests this Court to grant him a Writ of Habeas Corpus and order Respondents to release him from custody under reasonable conditions of supervision. He is seeking habeas relief under 28 U.S.C. § 2241, which is the proper vehicle for challenging civil immigration detention. *See Zadvydas v. Davis*, 533 U.S. 678, 687–88 (2001).

## **II. CUSTODY**

12. Mr. Yassine is in the physical custody and under the direct control of Respondents and their agents. He is detained at Hutto in Taylor, Texas.

## **III. JURISDICTION AND VENUE**

13. Jurisdiction is proper under 28 U.S.C. §§1331, 2241, and the Suspension Clause, U.S. Const. art. I, § 9, clause 2.
14. Pursuant to 28 U.S.C. § 2241, district courts have jurisdiction to hear habeas petitions by noncitizens who challenge the lawfulness of their detention under federal law. *Demore v. Kim*, 538 U.S. 510, 516–17 (2003); *Zadvydas*, 533 U.S. at 687; *Maldonado v. Macias*, 150 F. Supp. 3d 788, 794 (W.D. Tex. 2015).
15. Venue is proper in the United States District Court for the Western District of Texas because at least one Respondent is in this District, the Petitioner is detained in this District, and the Petitioner's immediate physical custodian is in this District. 28 U.S.C. § 1391(b).

## **IV. PARTIES**

16. Petitioner Yassine is currently detained by Respondents and their agents at Hutto. He has been in ICE custody since on or about April 3, 2025. His removal order became administratively final on November 20, 2020.
17. Respondent Charlotte Collins is the Warden of Hutto, where Petitioner is currently detained. She is a legal custodian of Petitioner and is named in her official capacity.
18. Respondent Vincent Marmolejo is the Assistant Field Office Director responsible for the San Antonio Field Office of ICE with administrative jurisdiction over Petitioner's case. He is a legal custodian of Petitioner and is named in his official capacity.

19. Respondent Miguel Vergara is the Field Office Director responsible for the San Antonio Field Office of ICE with administrative jurisdiction over Petitioner's case. He is a legal custodian of Petitioner and is named in his official capacity.
20. Respondent Todd M. Lyons is the Acting Director of ICE. He is a legal custodian of Petitioner and is named in his official capacity.
21. Respondent Kristi Noem is the Secretary of the United States Department of Homeland Security (DHS). She is a legal custodian of Petitioner and is named in her official capacity.
22. Respondent Pamela Bondi is the Attorney General of the United States Department of Justice. She is a legal custodian of Petitioner and is named in her official capacity.

#### **V. STATEMENT OF FACTS**

23. Mr. Yassine was born and raised in Ivory Coast. He does not hold Ivorian citizenship. In 2020, the Ivory Coast embassy informed Mr. Yassine that in order to apply for citizenship in Ivory Coast, he must be physically present in that country. He has never seen or had possession of an Ivory Coast birth certificate in his name.
24. Both of Mr. Yassine's parents were born in Lebanon. His parents were therefore able to obtain a Lebanese passport for him when his now-deceased father filed his birth with the Lebanese Embassy in Ivory Coast. That passport expired and is no longer in Mr. Yassine's possession. In 2020, Mr. Yassine's father attempted to go to an immigration office in Lebanon to get citizenship or travel documents for him. Officials at that office stated that they had no record of Mr. Yassine's birth.
25. Mr. Yassine first entered the United States on a visitor visa and his Lebanese passport in 1989. He was seventeen years old. He later married a United States citizen and received LPR status,

though that marriage dissolved years later. He applied for naturalization, but his application was ultimately denied.

26. Mr. Yassine was arrested in 2012. He believes that his expired Lebanese passport was seized by law enforcement with his other possessions after his arrest. He was convicted of tax evasion and money laundering in early 2013, and served a sentence of eight years and three months before being transferred to ICE custody in El Paso, Texas in June 2020.
27. Mr. Yassine was assaulted by an ICE detention officers in July 2020. *See* Ex. 1 at 101. Mr. Yassine reported this assault to another officer in the detention center. Upon hearing about the assault, the officer escorted Mr. Yassine to the medical unit, where she handcuffed him for over an hour. When she returned, she told Mr. Yassine that she was placing him in a Segregated Housing Unit, despite the fact that he had done nothing wrong. Mr. Yassine languished in segregated housing for several days, and lodged written complaints regarding his placement in segregation, which he believed to be retaliation for reporting the assault. Soon after, Mr. Yassine was transferred to another ICE facility.
28. As a result of the initial assault and subsequent abuse and harassment in retaliation for reporting the attack, Mr. Yassine began to experience mental health issues, including depression, anxiety, hallucinations, post-traumatic stress disorder (PTSD), and suicidal ideations. *See* Ex. 1 at 101.
29. An immigration judge revoked Mr. Yassine's LPR status while he was in ICE detention. Thereafter, Mr. Yassine applied for asylum, asserting fears of persecution by Hezbollah in Lebanon due to his previous occupation as a bar owner, and his identity as a bisexual man. That application was denied on October 20, 2020. He was ordered removed to Ivory Coast,



and in the alternative, Lebanon. Mr. Yassine reserved the right to appeal this judgment, but he did not do so. As such, his order of removal became final on November 20, 2020.

30. After his order of removal became final, ICE, with Mr. Yassine's cooperation, attempted and failed to secure travel documents from either country. Officials from the Ivory Coast Embassy advised Mr. Yassine that birth in the Ivory Coast does not confer citizenship on an individual, and further, that if he wanted to apply for Ivorian citizenship, he must be present in the country. Further, officials from the Lebanese Embassy did not respond to Mr. Yassine's inquiries regarding his citizenship status in Lebanon, while Mr. Yassine's father was unable to secure any record of his birth with officials in Lebanon.
31. Mr. Yassine's mental health further deteriorated in the fall of 2020 as his detention dragged on and his release became an uncertainty. This, coupled with his suffering in the aftermath of his assault at the hands of detention center staff, lead Mr. Yassine to plan and nearly attempt suicide in November 2020. *See* Ex. 1 at 101, 161. On November 30, 2020, ICE referred Mr. Yassine to a mental health treatment facility in El Paso for treatment, where his detention continued for nearly two months.
32. Mr. Yassine's mental health improved greatly while detained at the mental health facility. Doctors at this facility diagnosed him with Major Depressive Disorder, anxiety, and chronic PTSD. At this facility, Mr. Yassine was able to take advantage of individual and group therapy to better cope with the symptoms of his mental health conditions.
33. Mr. Yassine completed mental health treatment on January 5, 2021, and ICE transferred him back to his original detention facility where he had been assaulted. Returning to that facility affected him greatly and reversed the progress he had made in treatment. Upon realizing that he was going to be returned to the center where he was assaulted, he had a panic attack and

asked to be put in segregation. He went on a hunger strike for four days before ICE officials transferred him back to the El Paso mental health facility from January 8 to January 12, 2021.

34. On or about January 12, 2021, Mr. Yassine was returned for a second time to the El Paso ICE facility where he was assaulted. He once again expressed suicidal thoughts. Officials quickly transferred Mr. Yassine to a different mental health facility in Florida, only to be released days later.
35. On January 19, 2021, ICE officials released Mr. Yassine on Orders of Supervision pursuant to the injunction in *Fraihat v. U.S. Immigration and Customs Enforcement*, 5:19-cv-01546 (C.D. Cal. 2019) due to his mental health diagnosis of Major Depressive Disorder. The preliminary injunction in *Fraihat* required the government to conduct custody redeterminations at the request of medically vulnerable individuals during the COVID-19 pandemic.
36. Since being released under Orders of Supervision, Mr. Yassine has managed his Major Depressive Disorder through the use of medications, mental and emotional support from his long-term partner, and a service animal. Mr. Yassine's Orders of Supervision required him to check in with ICE officials at any time requested. He could not leave the state without contacting his ICE officer, and was required to notify ICE of any change in address or employment within 48 hours of any such changes.
37. In the over four years following his release, Mr. Yassine has built a life in Austin, Texas. He has not had any further contact with police, nor has he engaged in any criminal conduct. He is gainfully employed as a restaurant manager. He and his partner of two and a half years rent an apartment that they share with Mr. Yassine's thirteen-year-old German Shepard, Alex, who

is his emotional support animal. Mr. Yassine has abided the conditions that ICE has required of him under his Orders of Supervision.

38. On March 3, 2025, Mr. Yassine completed an in-person ICE check-in under the terms of his Orders of Supervision. Mr. Yassine's experience of this check-in was similar to the check-ins that he had in past years. This included several questions about his activities in the past year. An ICE check-in officer took photographs of him and told him they were going to try to obtain travel documents for his removal.
39. Several weeks later, on or about April 1, 2025, Mr. Yassine received a request to return to the Austin ICE field office. It was unusual for Mr. Yassine to be called to return back for an in-person visit so soon after an in-person check-in. This gave Mr. Yassine a sense that he might be re-detained when he arrived, despite having abided by all of the terms of his Orders of Supervision. Due to this concern, Mr. Yassine obtained legal counsel to accompany him to the field office.
40. When Mr. Yassine arrived at the field office with counsel on April 3, 2025, officials summarily detained him without giving him an opportunity to respond. Instead of advising Mr. Yassine that there had been a change in the circumstances of his inability to be removed, the detaining officer told Mr. Yassine that his removal was unlikely and ICE had not yet obtained his travel documents. The officer informed Mr. Yassine that he was being detained because ICE was getting pressure from Washington to make arrests.
41. Mr. Yassine's immigration counsel informed the detaining officer that he would be filing an administrative stay of removal with ICE. That request, which detailed Mr. Yassine's health concerns and the myriad of issues with removing him, was denied on April 15, 2025.

42. Since April 3, 2025, Respondents and their agents have detained Mr. Yassine at Hutto. The day after he arrived, a detention officer took multiple photos of Mr. Yassine to “send to Lebanon” and confirmed that ICE would seek to remove him only to Lebanon, and not to Ivory Coast.
43. On or about April 18, 2025, Mr. Yassine spoke with the detention officer assigned to his case, Officer Andrade. Officer Andrade told Mr. Yassine that the only new development since his last release from ICE is the “new administration.”
44. Officer Andrade also stated that he emailed the Embassy of Lebanon on April 14, 2025 and usually expects to receive travel documents within two or three weeks. He advised Mr. Yassine that if he did not hear back from the embassy by May 14, 2025, he would email again. After that, he stated that Mr. Yassine’s removal would be “out of his [Andrade’s] hands” and that Mr. Yassine’s detention would be “indefinite.”
45. Officer Andrade stated that he deliberately chose not to seek removal to Ivory Coast, admitting that it would be “impossible.” Officer Andrade told Mr. Yassine that he would provide an update as soon as he heard from the Embassy of Lebanon. As of the time of filing, Mr. Yassine had not heard from Officer Andrade since April 18, 2025.
46. Officer Andrade also informed Mr. Yassine that it was unlikely that he would be released following his custody determination hearing, currently scheduled for July 2, 2025.
47. Mr. Yassine has observed Officer Andrade meeting with other detainees located in his housing unit.
48. Mr. Yassine’s mental and physical health is once again deteriorating in indefinite immigration detention. *Compare* Ex. 1 at 161–63 (Mr. Yassine’s initial mental health intake) *with id.* at 8, 21, 34, 37, 38, 74, 80, 101, 103, 124 (subsequent mental health evaluations).

49. On April 4, 2025, the day after Mr. Yassine was re-detained, a social worker completed an intake that included a mental health screening. Ex. 1 at 161–63.
50. On April 11, 2025, Mr. Yassine was seen by a mental health professional employed at Hutto. After screening him for suicidal ideations, the doctor prescribed him medication for depression, but said there is nothing else he can do for Mr. Yassine at that facility. Ex. 1 at 101–03.
51. The same day, the social worker who screened Mr. Yassine recommended that he be placed in a single room in a separate dorm due to threats to go on hunger strike and suicide watch. That request was denied by the assistant warden. Ex. 1 at 74.
52. On or about April 23, 2025, Mr. Yassine expressed he was experiencing possible psychosis to a social worker at the detention center. The social worker told him that if his symptoms continued, he would be stripped naked and bound in solitary confinement on suicide watch. This terrified Mr. Yassine, whose experience has been that suicide watch worsens, not lessens, his suicidal ideations.
53. Mr. Yassine’s rapidly declining mental health has also had an impact on his physical health. Namely, Mr. Yassine’s high blood pressure, or hypertension, has been difficult to control, even with medication. *Compare* Ex. 1 at 151–54 (April 4, 2025 initial physical health intake) *with id.* at 61 (April 28, 2025 report of daily dizziness) *and* 49–51 (May 1, 2025 worsening symptoms and description of connection between hypertension and mental health).
54. Even with extremely high doses of medication meant to lower his blood pressure, doctors at the facility told Mr. Yassine that he is at risk of a heart attack and organ failure.
55. Knowing that he is stateless, Mr. Yassine is once again facing the trauma of indefinite detention.

56. As of the date of filing, Mr. Yassine has still received no explanation for his re-detention beyond the “pressure from Washington” and a “change of administrations.”

## VI. LEGAL FRAMEWORK

57. Liberty from detention is the rule, rather than the exception, under American jurisprudence. The Due Process Clause of the Fifth Amendment forbids the government from depriving any person of liberty without due process of law. U.S. Const. amend. V. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty” that the Due Process Clause Protects. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001) (citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)).
58. The Supreme Court has clearly held that due process dictates that immigration detention cannot be indefinite. Indefinite detention in particular raises a “serious constitutional problem” and violates the Due Process Clause. *Zadvydas*, 533 U.S. at 689–90. Accordingly, the Due Process Clause protects Mr. Yassine’s liberty, and any deprivation of his liberty must be narrowly tailored to serve a compelling government interest. *See Reno v. Flores*, 507 U.S. 292, 301–02 (1993) (holding that due process “forbids the government to infringe certain ‘fundamental’ liberty interests at all, no matter what process is provided, unless the infringement is narrowly tailored to serve a compelling state interest”). In the context of post-removal immigration proceedings, the government’s interest in detention is to ensure an individual’s presence at the time of removal. *Zadvydas*, 533 U.S. at 680. To the extent that an individual’s removal is unforeseeable, their detention becomes unconnected to the government’s interest, and thus, unlawful. *Id.*

### *The 90-day Removal Period*

59. The Immigration and Nationality Act (“INA”), 8 U.S.C. § 1231, governs the detention and

removal of noncitizens, like Mr. Yassine, who have been ordered removed. Section 1231(a)(2) authorizes only a 90-day period of mandatory post-final-removal-order detention, during which ICE is supposed to effectuate removal. This is known as the “removal period.” An individual detained by ICE is entitled to a custody redetermination following the expiration of the removal period. 8 C.F.R. § 241.4.

60. The 90-day removal period has run in Mr. Yassine’s case. Mr. Yassine was ordered removed on October 20, 2020. Although he reserved appeal, he did not perfect that appeal. As such, his appeal became administratively final on November 20, 2020. *See* 8 C.F.R. § 1241.1(c). The 90-day removal period, once it has expired, does not restart merely upon re-arrest. *Diaz-Ortega v. Lund*, No. 1:19-CV-670-P, 2019 WL 6003485, at \*8 (W.D. La. Oct. 15, 2019), report and recommendation adopted, No. 1:19-CV-670-P, 2019 WL 6037220 (W.D. La. Nov. 13, 2019) (“[T]he text of § 1231(a)(1)(B) does not mention restarting the removal period. Nor does any interpretive regulation of which the Court is aware.”).

***Zadvydas & the 180-Day Presumption of Reasonable Detention***

61. After the expiration of the removal period, § 1231(a)(6) permits certain noncitizens to be held beyond the removal period if they are inadmissible, or removable on grounds stemming from criminal convictions, security concerns, or if they have been determined to be a danger to the community or a flight risk. *See* 8 U.S.C. § 1231(a)(6). This detention, however, is subject to certain limits as outlined below. Further, § 1231(a)(6) permits these individuals to be released under certain conditions detailed in § 1231(a)(3). Finally, the government may continue to detain certain individuals under extreme circumstances, such as when an individual is a threat to public health, engaged in terrorism, or a particular danger to public safety. *See* 8 C.F.R. § 241.14. This detention is also subject to limits.

62. The Supreme Court has imposed strict limits on who can be detained beyond the 90-day removal period, noting that “[f]reedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause [of the Fifth Amendment] protects.” *Zadvydas*, 533 U.S. at 690. In *Zadvydas*, the legacy Immigration and Naturalization Service had detained Kim Ho Ma, a Cambodian national, and Kestutis Zadvydas, a man born to Lithuanian parents in a German displaced persons camp, for years after they were ordered removed. *Id.* at 684–86. Purporting to follow the plain text of § 1231(a)(6), the government asserted that the statute committed the question of whether to detain an individual, and for how long, to the executive, not the judiciary. *Id.* at 689.
63. The Supreme Court found squarely in favor of *Zadvydas* and Ma, holding that their prolonged detentions violated the Due Process Clause. *Id.* The Court noted that the indefinite detention scheme in § 1231(a)(6) raised constitutional claims that it had the power to review. *Id.* Further, the Court reasoned that immigration detention, which is civil in nature, is non-punitive in purpose and effect—and must be related to achieving those goals. *Id.* at 690. The Court held that indefinite detention is not permitted in the context of § 1231(a)(6) because it fails to achieve either regulatory purpose of protecting the community or preventing flight to avoid removal—particularly where an individual’s removal is a “remote possibility at best.” *Id.* at 690–92.
64. Interpreting § 1231(a)(6) in a constitutional manner, the Court in *Zadvydas* provided guidance to courts facing questions of prolonged detention under the statute. First, the Court raised that the primary question for a habeas court is to answer the question of whether the length of an individual’s detention is statutorily authorized—here, for the



express purpose of presence at the time of removal. *Id.* at 699. In doing so, the Court instructs a habeas court to:

ask whether the detention in question exceeds a period reasonably necessary to secure removal. It should measure reasonableness primarily in terms of the statute's basic purpose, namely, assuring the alien's presence at the moment of removal. Thus, if removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by statute.

*Id.* at 699–700.

65. Second, as an aid to courts and judicial administration, the Supreme Court in *Zadvydas* decided that detention for 180 days after a final order of removal, including the 90-day removal period, is presumptively reasonable under the INA and Due Process Clause. *Ali v. Dep't of Homeland Sec.*, 451 F. Supp. 3d 703, 707 (S.D. Tex. 2020) (citing *Zadvydas*, 553 U.S. at 701). The government must release a noncitizen whom it has detained beyond the presumptive 180-day period if it is unable to present documented confirmation that removal is likely to occur in the reasonably foreseeable future. *Clark v. Martinez*, 543 U.S. 371, 386 (2005).
66. In crafting this presumptively reasonable 180-day period, the Supreme Court specifically rejected the Fifth Circuit's reasoning that indefinite detention could remain "lawful as long as 'good faith efforts to effectuate . . . deportation continue' and *Zadvydas* failed to show that deportation will prove 'impossible.'" *Id.* at 702 (quoting *Zadvydas v. Underdown*, 185 F.3d 279, 294 (5th Cir. 1999), *vacated sub nom. Zadvydas v. Davis*, 533 U.S. 67 (2001)).
67. Thus, noncitizens whose removal is not reasonably foreseeable and who have been detained for a period not consistent with the purpose of effectuating removal must be released because their continued detention would violate both § 1231(a)(6) and the Due Process Clause of the Fifth Amendment. *Id.* at 701.

68. The 180-day period of reasonableness for continued detention has closed in Mr. Yassine's case. Mr. Yassine's order of removal became final on November 20, 2020. He was released from detention on January 19, 2021, and has presented himself faithfully to ICE officials since that time. ICE officials have presumably worked in the over four years since his release to effectuate his removal, yet they have been unable to do so.
69. Respondents cannot now, years down the road, re-detain Mr. Yassine, and attempt to take advantage of this presumption when their own agents have expressed that his removal is not any more foreseeable than it was during his release. Officials' re-detention of Mr. Yassine itself violates the clear directive of the Court to ensure that any detention be for the sole purpose of his foreseeable removal.

***The 180-day period is a rebuttable presumption, not a bright line rule***

70. Even assuming that the 180-day period has not expired, Mr. Yassine's detention is unlawful because it is not related to his foreseeable removal. Consistent with the bedrock principle in *Zadvydas* that detention must be connected to ensuring that an individual is present for removal, the government cannot hide behind the presumption that 180 days of post-removal detention is reasonable when continued detention is completely unmoored from reasonably foreseeable removal. *Zadvydas* "d[oes] not *require* a detainee to remain in detention for six months or to prove that the detention was of an indefinite duration before a habeas court could find that the detention is unconstitutional." *Ali*, 451 F. Supp. 3d at 708 (emphasis added). Instead, "*Zadvydas* established a 'guide' for approaching detention challenges, not a categorical prohibition on claims challenging detention less than six months." *Trinh v. Homan*, 466 F. Supp. 3d 1077, 1093 (C.D. Cal. 2020).
71. A challenge made within 180 days of detention after final order of removal merely shifts

the burden of proof of unremovability to the petitioner, *see Cesar v. Achim*, 542 F. Supp. 2d 897, 903 (E.D. Wis. 2008), and once the petitioner meets that burden, the government must put forth evidence as to the foreseeability of the petitioner's removal, *see Khan v. Gonzales*, 481 F. Supp. 2d 638, 641 (W.D. Tex. 2007).

72. Moreover, the *Zadvydas* Court's reasoning behind the 180-day rebuttable presumption does not create a floor for every constitutionally infirm detention. The Court posited that 180 days of detention after final order of removal was presumably reasonable "to grant the Government appropriate leeway when its judgments rest upon *foreign policy expertise*." *Zadvydas*, 533 U.S. at 700 (emphasis added). Where the reason to detain an individual does not "implicate foreign policy and administrative expertise" and "the analysis drifts out of that realm, the justification for the presumption no longer applies." *Cesar*, 542 F. Supp. 2d at 904.
73. Thus, even if post-removal-order detention has been for less than 180 days, if "the sole purpose of [detention] was to effectuate imminent removal," and imminent removal is not possible, the detention "no longer serves its intended purpose, and thus, is unreasonable," particularly when it "follows a previous detention, on the same grounds." *Ali*, 451 F. Supp. 3d at 708.
74. In *Ali*, the petitioner was re-detained for the purpose of effectuating his release to Pakistan after six years of supervised release, but within two months, COVID-19 pandemic travel shutdowns canceled his removal flights. 451 F. Supp. 3d at 706–07. Despite just a few-months' length detention, the court granted Ali a writ of habeas corpus because he could not be removed and his detention no longer served its intended purpose. *Id.* at 708. The government could not hide behind the presumption of reasonableness for 180 days of post-

final-removal-order detention because the petitioner had already languished in immigration detention prior to being released on an order of supervision, and was re-detained only to attempt to remove him anew. *Id.* When that removal became foreseeable, the government's interest in detaining him melted away, and his detention became unlawful. *Id.*

75. Release is the proper remedy for unconstitutionally indefinite post-removal-order detention. *See Zadvydas*, 533 U.S. at 699–700 (explaining that supervised release is the appropriate relief when “the detention in question exceeds a period reasonably necessary to secure removal” because at that point, detention is “no longer authorized by statute”).

*The 180-day presumption of reasonableness of detention is rebutted in this case*

76. Even if the government claims it is entitled to detain Mr. Yassine for six months of “presumptively reasonable” detention, that presumption is rebutted in this case where Mr. Yassine has already shown *no* reasonable purpose to his detention.
77. Mr. Yassine's re-detention fits squarely within the *Zadvydas* framework. Like the petitioner in *Zadvydas*, Mr. Yassine was neither born in a country that can claim him, nor recognized by his parents' country of origin. His removal order to Ivory Coast, or in the alternative, Lebanon, became administratively final nearly five years ago, on November 20, 2020. He has not impeded his own removal, but nevertheless lacks any documents proving citizenship of, or travel documents for entry to, any country. Despite numerous attempts by ICE to remove him to Lebanon or to Ivory Coast, neither country has evinced any willingness or ability to issue him citizenship or travel documents. ICE therefore cannot demonstrate a significant likelihood of removability in the reasonably foreseeable future, which should have been a prerequisite to re-detaining Mr. Yassine in 2025.
78. The unlikelihood of Mr. Yassine's removal is evidenced by Respondents' agents' statements

upon his re-detention. Two separate officers indicated that there are no material changes in the attempted effectuation of Mr. Yassine's removal order. The ICE officer who re-detained Mr. Yassine expressed that his removal was unlikely, but that they were getting pressure from Washington to make arrests, and a detention officer told him that the change in his detention status was due simply to the change in administrations.

79. Indeed, even as Mr. Yassine presented himself to be re-detained on April 3, 2025, the arresting ICE officer admitted that they had not yet secured travel documents, and in fact had not yet even applied for new travel documents from Lebanon. After Mr. Yassine's deportation officer emailed the Embassy of Lebanon, the officer expressed that travel documents are typically issued within two or three weeks of ICE's requests, but as far as Mr. Yassine is aware, ICE has not yet received any documents as of the time of filing. Mr. Yassine's deportation officer has indicated that he is unlikely to be released by the time he is scheduled for a custody redetermination hearing on June 2, 2025, and is likely to remain detained indefinitely. This rationale—that Mr. Yassine can be detained while the government makes attempts to contact a country that historically has refused to issue travel documents to him, is precisely the rationale that was rejected by the Court in *Zadvydas*. See *Zadvydas*, 533 U.S. at 702 (detaining someone as long as “good faith efforts” to remove were ongoing was “more than [the Court’s] reading of the statute can bear”). Mr. Yassine has therefore more than met his burden to establish “good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future.” *Id.* at 701.
80. Nor has the government shown that there are any specific justifications for continuing Mr. Yassine's detention under the special circumstances contained in 8 C.F.R. § 241.14; see also *Zadvydas*, 533 U.S. at 690–91. Like the petitioner in *Ali*, Mr. Yassine has faithfully complied

with every term of his Order of Supervision for years after his final order of removal, and does not pose a flight risk or danger to the community. *See Ali*, 451 F. Supp. 3d at 709.

***Mr. Yassine's continued detention is a violation of Due Process***

81. Mr. Yassine's indefinite detention also presents a due process challenge outside the *Zadvydas* framework. "[A]s-applied constitutional challenges remain available to address 'exceptional' cases." *Johnson v. Arteaga-Martinez*, 596 U.S. 573, 583 (2022); *see also Castaneda v. Perry*, 95 F.4th 750, 761 (4th Cir. 2024) ("We will therefore assume . . . that as-applied due process challenges to §1231 detentions may proceed outside the *Zadvydas* framework when the alien presents, as a threshold matter, exceptional circumstances warranting that departure."). Civil detention is only allowed in narrow circumstances, "where a special justification . . . outweighs the 'individual's constitutionally protected interest in avoiding physical restraint'" under the Fifth Amendment. *Zadvydas*, 533 U.S. at 690 (quoting *Kansas v. Hendricks*, 521 U.S. 346, 356 (1997)). Detention as punishment for noncriminal purposes is not allowed. *See Bell v. Wolfish*, 441 U.S. 520, 535 (1979). Thus, the Fifth Amendment bars civil detention in conditions that do not reasonably relate to a "legitimate, non-punitive governmental objective." *Cadena v. El Paso County*, 946 F.3d 717, 727 (5th Cir. 2020).
82. Mr. Yassine's 90-day removal period has expired, and there have been no changes to his stateless condition since his release under Orders of Supervision in 2021. Mr. Yassine was re-detained with no explanation other than the administration change. His detaining officer and deportation officer expressly admitted that he was not likely to be removed to a country to which he has little connection that will not issue him travel documents.
83. Furthermore, ICE is well aware of Mr. Yassine's mental health conditions, which began in ICE detention. This resulted in his suicide attempts, hospitalization, and ultimate release due

to his mental health diagnoses. Facing another bout of indefinite detention, Mr. Yassine is now undergoing another extreme mental health crisis, which is exacerbating his hypertension and causing major distress.

84. His statelessness and lack of any progress in obtaining his travel documents make his re-detention entirely unreasonable and untethered to the purpose of his detention. *See Ali*, 451 F. Supp. 3d at 708.
85. Mr. Yassine’s mental health crisis, physical health concerns, deep ties to the United States, and compliance with his Orders of Supervision for over four years also constitute “exceptional” circumstances that warrant consideration of an as-applied Due Process challenge. *See Johnson v. Arteaga-Martinez*, 596 U.S. at 583.
86. Therefore, Mr. Yassine’s continued detention violates the implicit requirement in § 1231(a)(6) that detention should not become unreasonably prolonged after the 90-day statutory removal period.
87. Mr. Yassine’s continued detention serves no legitimate government purpose.

## **VII. CLAIMS FOR RELIEF**

### **COUNT ONE**

#### **Violation of The Immigration and Nationality Act – 8 U.S.C. § 1231**

88. Petitioner repeats and realleges each allegation of this petition here.
89. Title 8 U.S.C. § 1231(a) governs the detention of an individual with a final order of removal. The INA permits DHS to detain an immigrant during the “removal period,” which is defined as the 90-day period following the issuance of a final order of removal. *See* 8 U.S.C. §§ 1231(a)(1)(A); 1231(a)(2).

90. Mr. Yassine has not engaged in any conduct to trigger an extension of the removal period under § 1231(a)(1)(C). Mr. Yassine has cooperated with all requests relating to his removal.
91. Because Mr. Yassine is well past the 90-day removal period, and he has done nothing to extend the removal period, ICE is necessarily detaining him under § 1231(a)(6). Section 1231(a)(6) is the discretionary, post-removal period detention provision.
92. ICE already detained Mr. Yassine for months after his removal order became administratively final in November 2020. During this time, efforts to remove him to countries that would not accept him or issue him citizenship or travel documents failed. He was then released under Orders of Supervision and has spent the last four years abiding by that order. With no change in his stateless circumstances, ICE's re-detention of Mr. Yassine under § 1231 cannot be presumed reasonable. Because Mr. Yassine's detention has exceeded his removal period and ICE has made no showing that it is significantly likely to remove Mr. Yassine in the reasonably foreseeable future, he is therefore entitled to release under *Zadvydas*.
93. Furthermore, there is no "sufficiently strong special justification" for ICE to continue to detain Mr. Yassine. *See Zadvydas*, 533 U.S. at 690–91. Thus, Mr. Yassine's detention violates § 1231, and he is entitled to immediate release from custody.
94. Thus, there are two alternative ways in which Mr. Yassine's detention runs afoul of *Zadvydas* and its progeny. First, Mr. Yassine's detention is beyond the 180 days during which the government can detain with a presumption of reasonableness. Second, even if this Court does not recognize he is detained beyond that time period, any presumption of reasonableness is rebutted by the facts of this case.



**COUNT TWO**

**Violation of the Due Process Clause  
of the Fifth Amendment to the U.S. Constitution**

95. Petitioner repeats and realleges each allegation of this petition here.
96. Civil immigration detention violates due process if it is not reasonably related to its statutory purpose. *See id.* at 690 (citing *Jackson v. Indiana*, 506 U.S. 715, 738 (1972)). The Supreme Court recognized that the statutory purpose of § 1231 was to detain noncitizens with final orders of removal to effectuate removal. *Zadvydas*, 533 U.S. at 697 (§ 1231’s “basic purpose” is to “effectuat[e] an alien’s removal.”).
97. Mr. Yassine has already endured months of civil detention, and his re-detention is certain to continue into the indefinite future. His re-detention is not reasonably related to the primary statutory purpose of effectuating removal. *See id.* at 697; *Clark*, 543 U.S. at 384; *Ali*, 451 F. Supp. 3d at 707.
98. Even outside the *Zadvydas* framework, “as-applied constitutional challenges remain available to address ‘exceptional’ cases.” *Arteaga-Martinez*, 596 U.S. at 583.
99. Here, Mr. Yassine has presented several exceptional circumstances. He is stateless and has no chance of removal to Lebanon or Ivory Coast, given ICE’s repeated failures to obtain travel documents, rendering his detention unmoored from the rationale of facilitating removal. He is also suffering a mental health crisis that cannot be treated in detention. Therefore, he may bring an as-applied challenge to his indefinite detention as a violation of his substantive Due Process rights.
100. Thus, Mr. Yassine’s detention violates substantive due process.

### VIII. PRAYER FOR RELIEF

WHEREFORE, Mr. Yassine prays that the Court grant the following relief:

- A. Assume jurisdiction over this matter;
- B. Declare Mr. Yassine's re-detention to be unlawful and unconstitutional;
- C. Order the immediate release of Mr. Yassine on an Order of Supervision;
- D. Require that any re-detention in the future be subject to a hearing before this court;
- E. Enjoin Respondents from transferring Mr. Yassine outside of this judicial district pending litigation of this matter or his removal proceedings;
- F. Award Mr. Yassine reasonable costs and attorneys' fees; and
- G. Grant any other relief that this Court deems just and proper.

Dated: May 23, 2025

Respectfully submitted,

/s/Erin D. Thorn

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**Verification by Hussein Ali Yassine Pursuant to 28 U.S.C. Section 2242**

I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: 5/23, 2025

Signature: Hussein Yassine