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U.S. DISTRICT COURT WESTERN DISTRICT OF LOUISIANA

JUN 0 4 2025

IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF LOUISIANA MONROE DIVISION

DANIEL J. McCOY, CLERK BY:

BEGALIEVA NIGORA NURIDDINOVNA, Petitioner,

3:25C1112

PAM BONDI, Attorney General of the United States; KRISTI NOEM, Secretary of the Department of Homeland Security; TODD LYONS, Acting Director of U.S. Immigration and Customs Enforcement (ICE); WARDEN OF RICHWOOD CORRECTIONAL CENTER, Respondents.

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

Petitioner respectfully petitions this Court for a writ of habeas corpus to challenge her continued detention by U.S. Immigration and Customs Enforcement (ICE) and alleges as follows:

- 1. Petitioner is a non-citizen currently detained by ICE at Richwood Correctional Center I. INTRODUCTION
- 2. Petitioner has been detained for over nine (10) months since [07.05.2024], and there in Richwood, Louisiana. has been no significant progress or resolution in her immigration proceedings.
- 3. Petitioner files this habeas corpus petition under 28 U.S.C. § 2241 to challenge his prolonged and indefinite detention, which violates the Due Process Clause of the Fifth Amendment of the United States Constitution.

- II. JURISDICTION AND VENUE 4. This Court has jurisdiction under 28 U.S.C. § 2241 as Petitioner is in custody under the authority of the United States, and he seeks relief from unconstitutional detention.
- 5. Venue is proper in the Western District of Louisiana because Petitioner is detained in this district at the Richwood Correctional Center.

- 6. Petitioner: BEGALIEVA NIGORA NURIDDINOVNA, is a native and citizen of Uzbekistan, III. PARTIES currently held at Richwood Correctional Center, 180 Pine Bayou Cir, Richwood, LA 71202.
- 7. Respondents include:
- PAM BONDI, Attorney General of the United States;
- KRISTI NOEM, Secretary of the Department of Homeland Security;
- TODD LYONS, Acting Director of U.S. Immigration and Customs Enforcement (ICE);
- Warden of Richwood Correctional Center.

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## IV. FACTUAL BACKGROUND

- 8. Petitioner was taken into ICE custody on or about [дата].
- 9. Petitioner has remained in detention for approximately nine months without being granted release or a bond hearing.
- 10. Petitioner's removal is not reasonably foreseeable. ICE has not made meaningful progress in effectuating the removal.
- 11. Prolonged detention without a bond hearing is unlawful under the U.S. Constitution and relevant case law (e.g., Zadvydas v. Davis, 533 U.S. 678 (2001)).

### V. CLAIM FOR RELIEF

- 12. Petitioner's continued detention without due process violates the Fifth Amendment of the U.S. Constitution.
- 13. Under Zadvydas, detention beyond six months without a significant likelihood of removal is unlawful.

### VI. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

- a. Issue a writ of habeas corpus ordering Petitioner's immediate release from detention;
- b. Order ICE to release Petitioner under appropriate supervision;
- c. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted, BEGALIEVA NIGORA NURIDDINOVNA

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Pro Se Richwood Correctional Center 180 Pine Bayou Cir Richwood, LA 71202

NIBORA BEGALIEVA Much 05.29,2025