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UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

EASTERN DIVISION

Sunday Kayode Kunkushi,

Petitioner,

v.

Warden, Desert View Annex; **Ernesto Santacruz Jr.** Acting Field Office Director of Los Angeles Field Office, U.S. Immigration and Customs Enforcement; **Kristi Noem,** Secretary of the U.S. Department of Homeland Security; and **Pamela J. Bondi,** Attorney General of the United States, in their official capacities,

Respondents.

No. 5:25-cv-01608-SRM-PVC

PETITIONER'S REPLY IN SUPPORT OF A WRIT OF HABEAS CORPUS

Honorable Serena R. Murillo
United States District Judge

Honorable Pedro V. Castillo
United States Magistrate Judge

I. INTRODUCTION

Mr. Kunkushi is not lawfully detained pursuant to Section 1231(a) and its implementing regulations. This is because ICE failed to comply with the requirements of 8 CFR § 241.14(i)(2) which include notice "upon revocation" of release of the reasons for revocation and an informal interview "promptly" after revocation. 8 CFR § 241.14 241.14(i)(2). To date, Mr. Kunkushi has not been provided with an interview. *See Notice of Revocation*, Exh. A. He was not provided with notice "upon revocation," but over a month after his re-detention. *Notice of Revocation*, Exh. A. Mr. Kunkushi has been fully cooperating with the conditions of his release, no new contact with law enforcement, and there is no reason why ICE could not seek to effectuate his removal while he remained outside of detention. *Kunkushi Decl.*, ¶ ¶ 7–8. Re-detention without notice violates Mr. Kunkushi's procedural due process rights. *Mathews v. Eldridge*, 424 U.S. 319, 332 (1976).

Mr. Kunkushi has also met his burden to establish that his removal is not reasonably foreseeable as he has twice attempted to obtain a travel document from Nigeria in 2022 and 2023, travelling to the Nigerian consulate in Atlanta, Georgia to request his passport. *Kunkushi Decl.*, ¶ ¶ 9–10. The Nigerian government has not issued him that document. *Id.* The Government has not explained why the Nigerian government is likely to be responsive to its request for a travel document when Mr. Kunkushi could not obtain that document directly. *Jensen Decl.*, ¶ 21. The Government's position that Mr. Kunkushi's "deportation is imminent" is belied by the fact that its prior efforts to obtain a Nigerian travel document for Mr. Kunkushi took from August 2020 to December 2020. *Jensen Decl.*, ¶ ¶ 12, 16. Mr. Kunkushi also demonstrates that his removal is not reasonably foreseeable given that he recently filed a U Visa based on when he was the victim of felonious assault. *Kunkushi Decl.*, ¶ 11; *Barba Decl.*, ¶ 6.

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II. ARGUMENT

Mr. Kunkushi's habeas petition should be granted as he has shown his removal is not reasonably foreseeable and ICE did not comply with the notice and interview requirements of 8 C.F.R. § 241.14(i)(2).

A. Mr. Kunkushi's removal is not reasonably foreseeable.

8 U.S.C. § 1231(a)(1)-(2) authorizes detention of noncitizens during "the removal period," which is defined as the 90-day period beginning on "the latest" of either "[t]he date the order of removal becomes administratively final"; "[i]f the removal order is judicially reviewed and if a court orders a stay of the removal of the [noncitizen], the date of the court's final order"; or "[i]f the [noncitizen]is detained or confined (except under an immigration process), the date the [noncitizen] is released from detention or confinement."

In *Zadvydas*, the Supreme Court held that "the statute, read in light of the Constitution's demands, limits [a noncitizen's] post-removal-period detention to a period reasonably necessary to bring about that [noncitizen's] removal from the United States." *Zadvydas v. Davis*, 533 U.S. 678, 689 (2001). "[O]nce removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute." *Id.* at 699.

In determining the reasonableness of detention, the Supreme Court recognized that, if a person has been detained for longer than six months following the initiation of their removal period, their detention is presumptively unreasonable unless deportation is reasonably foreseeable; otherwise, it violates that noncitizen's due process right to liberty. *Zadvydas*, 533 U.S. at 701. In this circumstance, if the noncitizen "provides good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future, the Government must respond with evidence sufficient to rebut that showing." *Id.*

Here, the removal period began on July 16, 2020, when the Ninth Circuit judicially reviewed the removal order and denied Mr. Kunkushi's stay of removal. *Jensen Decl.*, ¶

10; *Kunkushi Decl.*, ¶ 5. It is now almost five years after the removal period. Between Mr. Kunkushi's January 6, 2021 release and July 10, 2025, ICE took no action to pursue a travel document for Mr. Kunkushi. *Jensen Decl.*, ¶ 21. Mr. Kunkushi need not be detained for ICE to pursue the issuance of those travel documents. Mr. Kunkushi himself made significant efforts to obtain travel documents. He states:

> I tried to get travel documents to Nigeria. I travelled to the Nigerian consulate in Atlanta twice to try to get travel documents in 2022 and 2023. Both times, the consulate officials were not able to issue me a passport. I haven't lived in Nigeria since I was 18 years old, so I think that complicates things. They told me at the consulate to go to New Jersey to get a Nigerian Identification Number (NIN) before I could get a passport.
>
> So, in September 2024, I also travelled to New Jersey to try to get a NIN. I was told I needed to get a Nigerian Identification Number before I could get a passport. The person who I met with in New Jersey said that they were not able to provide me with a NIN because they needed more identifying information like a Nigerian Bank Verification Number (BVN). I do not have that. Most recently, I asked my sister in Nigeria to go to the internal revenue in Nigeria to get my mother's tax documents which may list me as her child and may have a BVN. (My mom has since passed away so she couldn't go herself). We are waiting to hear from the court in Nigeria to see if my sister is allowed to get that document. I took a document to my ICE check in January 2025 showing we are waiting for the court document. They took the document, so I no longer have a copy of it.

Kunkushi Decl., ¶ 9–10.

The Government's evidence is not sufficient to rebut the showing that Mr. Kunkushi's removal is not reasonably foreseeable. ICE does not provide evidence that Mr. Kunkushi's removal is reasonably foreseeable, only that "*after receiving the travel documents from the government of Nigeria*, ICE will be able to promptly effectuate his removal to his home country in the reasonably foreseeable future." *Jensen Decl.*, ¶ 23. However, ICE does not provide a timeframe for when that travel document might be

issued aside from "within normal processing times for the government of Nigeria." *Jensen Decl.*, ¶ 23. Nor does it refute Mr. Kunkushi's statements that he has been repeatedly attempting to obtain a travel document without success. ICE provides no evidence as to why its own request, rather that the individual seeking a travel document himself, is more likely to result in successfully obtaining the travel document.

The Government cites to *Muthalib v. Kelly* for the proposition that the mere passage of time is insufficient to show that removal is not reasonably foreseeable. *Response Br.*, Doc. No. 11 at 5. Mr. Kunkushi's circumstances are distinct. The Court in *Muthalib* cited Petitioner Muthalib's interview with the Consulate General of Ghana and additional notification from the Ghanan government as factors showing removal was foreseeable. *Adinan Abdul Muthalib v. Kelly*, Case No. SA-CV-16-02186-KS, 2017 U.S. Dist. LEXIS 59967 at *9–10 (C.D. Cal. Apr. 19, 2017). Here, there is no such evidence. Rather, ICE has merely requested the travel document from Nigeria. *Jensen Decl.*, ¶ 21. Mr. Kunkushi has done the same on numerous occasions without successful issuance of a travel document. *Kunkushi Decl.*, ¶ ¶ 9–10; *see Quoc Chi Hoac v. Becerra,* Case No. 2:25-cv-01740-DC-JDP, 2025 U.S. Dist. LEXIS 136002, *10 (E.D. Cal. July 16, 2025) (addressing habeas petition relating to removal to Vietnam and stating the "fact that Respondents intend to complete a travel document request for Petitioner does not make it significantly likely he will be removed in the foreseeable future").

Further, Petitioner Muthalib was within 13 months of the final removal order, not 5 years as Mr. Kunkushi is here. *Adinan Abdul Muthalib*, 2017 U.S. Dist. LEXIS 59967 at *2, *9–10 (recognizing that "at some point in time the inability to procure travel documents may provide good reason to believe that removal is unlikely to be carried out").

B. <u>Mr. Kunkushi's pending U visa application further supports his position that his removal is not reasonably foreseeable.</u>

Mr. Kunkushi has also now applied for a U visa based on when he was the victim of felonious assault. *Barba Decl.*, ¶ 6 (U visa application filed on July 17, 2025);

Kunkushi Decl., ¶ ¶ 11–12. He can now seek reopening of his removal proceedings with the Board of Immigration Appeals given this changed circumstance along with an emergency stay of removal. *See* 8 U.S.C. § 1229a(c)(7)(C) (authorizing motions to reopen where there are new facts).

A noncitizen is eligible for status under the U Visa program if (1) he suffered substantial physical or mental abuse as a result of having been a victim of one of the enumerated crimes; (2) he possesses or possessed information concerning the criminal activity; (3) he has been helpful, is being helpful, or is likely to be helpful to a Federal, State, or local law enforcement official, to a Federal, State, or local prosecutor, to a Federal or State judge, to the Service, or to other Federal, State, or local authorities investigating or prosecuting the criminal activity; and (4) the criminal activity violated the laws of the United States or occurred in the United States (including in Indian country and military installations) or the territories and possessions of the United States. *See* 8 U.S.C. § 1101(a)(15)(U).

The administrative processing to accord U nonimmigrant status to eligible petitioners and derivatives is tightly prescribed and regulated. First, a petitioner must obtain a certification from a law enforcement official that he was the victim of a crime, the crime is a recognized crime under the U visa program, and that he was, or is likely to be helpful in the investigation, or prosecution of the criminal activity. The USCIS has prescribed that law enforcement officials make this certification on a particular form, USCIS Form I-918 Supplement B, U Nonimmigrant Status Certification. *See* 8 C.F.R. § 214.14(a)(12).

Second, on submission, the USCIS makes a completeness check to verify that all required initial evidence is present. The petition must include Form I-918, Petition for U Nonimmigrant Status; Form I-918, Supplement B, U Nonimmigrant Status Certification; Form I-192, Application for Advance Permission to Enter as Nonimmigrant, if there are any inadmissibility issues; a personal statement describing the criminal activity of which the applicant was a victim; and evidence to establish each eligibility requirement.

Third, USCIS either adjudicates the petition by granting U-nonimmigrant status or, in most cases, places the petitioner on the wait-list status for an adjudication. *See* 8 C.F.R. § 214.14(d)(2). A statutory cap limits the grant of U visas to 10,000 per fiscal year. 8 U.S.C. § 1184(p)(2)(A); 8 C.F.R. § 214.14(d)(1). A wait list was created by regulation to provide deferred action to an eligible petitioner whenever the statutory cap is reached within a given fiscal year. *See New Classification for Victims of Criminal Activity; Eligibility for "U" Nonimmigrant Status*, 72 Fed. Reg. 53014, 53027 (Sept. 29, 1995) (codified at 8 C.F.R. § 214.14(d)(2)).

If approved, the validity period in U visa status is four years. After an individual has held U visa status for three years, the individual may apply for adjustment of status to that of a U.S. lawful permanent resident. 8 C.F.R. § 245.24. A U visa is thus a path to first, non-immigrant status, and then lawful permanent residence.

A U visa can also form the basis of a motion to administratively close or terminate removal proceedings before the Board of Immigration Appeals. *See* 8 C.F.R. 1003.1(l); *Matter of Avetisyan*, 25 I&N Dec. 688 (BIA 2012).

ICE Directive 11005.4 further provides that "prior to conducting a civil enforcement action against" a petitioner for a U visa, "agents should consult with the Office of the Principal Legal Advisor "to ensure any such action is consistent with applicable legal limitations." Caleb Vitello, ICE-DHS, *Interim Guidance on Civil Enforcement Actions Involving Current or Potential Beneficiaries for Victim Based Immigration Benefits* (last accessed July 22, 2025) *available at* https://www.ice.gov/ doclib/foia/ policy/11005.4.pdf.

That Mr. Kunkushi now has a U visa pending and can now file a motion to reopen with the Board of Immigration Appeals along with a stay of removal further demonstrates that his removal is not reasonably foreseeable.

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C. ICE did not provide Mr. Kunkushi notice of the reason for re-detention "upon revocation" in violation of 8 CFR 241.13(i)(2) / 8 CFR 241.4(1) nor did ICE provide him with a "prompt" informal interview.

Upon release, a noncitizen subject to a final order of removal must comply with certain conditions of release. 8 U.S.C. § 1231(a)(3), (6). The revocation of that release is governed by 8 C.F.R. § 241.13(i), which authorizes ICE to revoke a noncitizen's release for purposes of removal. Specifically, a noncitizen's release may be revoked "if, on account of changed circumstances," it is determined that "there is a significant likelihood that the [noncitizen] may be removed in the reasonably foreseeable future." 8 C.F.R. § 241.13(i)(2).

"Upon revocation" ICE is required to take certain actions including notifying the non-citizen of the reasons for revocation of his release.[1] 8 CFR 241.13(i)(2), (3). Further, ICE is to conduct "an initial informal interview promptly after his or her return to Service custody to afford the [non-citizen] an opportunity to respond to the reasons for revocation stated in the notification." 8 CFR § 241.13(i)(3). Factors for ICE to consider in the revocation determination include:

> [T]he history of the [non-citizen's] efforts to comply with the order of removal, the history of the Service's efforts to remove [non-citizens] to the country in question or to third countries, including the ongoing nature of the Service's efforts to remove this [non-citizen] and the [non-citizen's] assistance with those efforts, the reasonably foreseeable results of those efforts, and the views of the Department of State regarding the prospects for removal of [non-citizens] to the country or countries in question.

8 C.F.R. § 241.13(f).

Here, Mr. Kunkushi was not served with Notice the Revocation of Release "upon revocation," or on or before June 4, 2025 when he was re-detained. *Kunkushi Decl.*, ¶ 26. Rather, he was served with that document on July 14, 2025. *Notice of Revocation*, Exh.

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[1] *See also* 8 C.F.R. § 241.4(l) ("Upon revocation, the [non-citizen] will be notified of the reasons for revocation of his or her release or parole).

A; *Jensen Decl.*, ¶ 22. ICE did not conduct an informal interview with Mr. Kunkushi "promptly" after his return to custody. *Kunkushi Decl.*, ¶ 27; *Notice of Revocation of Release*, Exh. A. It has yet to do so. *Notice of Revocation of Release,* Exh. A (stating, in a letter dated July 13, 2025, "You *will* promptly be afforded an informal interview at which you will be given an opportunity to response to the reasons for the revocation); *Jensen Decl.*, *passim* (providing no mention of an informal interview). There is no evidence that the factors at 8 CFR § 241.13(f) were considered. To the contrary, the Notice of Revocation of Release provided to Mr. Kunkushi on July 14, 2025 summarily provides that "this decision has been made based on a review of your official alien file and a determination that there are changed circumstances in your case" and "your case is under current review by the Government of Nigeria for the reissuance of a travel document." *Notice of Revocation of Release*, Exh. A.

The Government does not contest that 8 C.F.R. § 241.13 regulation applies to Mr. Kunkushi. Nor does the Government argue that the regulation has been complied with. *Response Br.*, Doc. No. 11 at 4–5.

Government agencies are required to follow their own regulations. *United States ex rel Accardi v. Shaughnessy*, 347 U.S. 260, 268 (1954). ICE has not done so here.

Mr. Kunkushi's re-detention is thus unlawful. *See Wing Nuen Liu v. Carter*, No. 25-cv-03036-JWL, 2025 WL 1696526, at *2 (D. Kan. Jun. 17, 2025) (finding "that officials did not properly revoke petitioner's release pursuant to [§] 241.13" because "and most obviously . . . petitioner was not granted the required interview upon the revocation of his release"); *Sering Ceesay v. Kurzdorfer*, No. 25-cv-00267-LJV, 2025 WL 1284720, at *21 (W.D. N.Y. May 2, 2025) (finding petitioner was not afforded even minimal due process protections when ICE failed to provide petitioner an informal interview upon his re-detainment); *Quoc Chi Hoac v. Becerra et al.,* 2:25-cv-01740-DC-JDP, 2025 U.S. Dist. LEXIS 136002, *9 (E.D. Cal. July 16, 2025) ("Because there is no indication that an informal interview was provided to Petitioner, the court finds Petitioner is likely to succeed on his claim that his re-detainment was unlawful").

D. ICE did not provide Mr. Kunkushi notice of the reason for re-detention prior to re-detention, a violation of his procedural due process rights.

Due process further requires notice prior to re-detention. *Nak Kim Chhoeun v. Marin*, 442 F. Supp. 3d 1233, 1244–1251 (C.D. Cal. 2020). The United States District Court for the Central District of California in *Kim Chhoeun* addressed the question of "whether the Constitution requires notice before an immigrant who is subject to a final removal order, but has been released despite that removal order (often for years or decades) and committed no further crimes, may be re-detained for purposes of removal." *Nak Kim Chhoeun*, 442 F. Supp. 3d at 1244. The Court concluded that such notice was required to the class of Cambodians with final removal orders released from detention who have been living and working in the United States for years. *Nak Kim Chhoeun*, 442 F. Supp. 3d at 1241, 1251.

As in *Kim Chhoun*, procedural due process required notice to Mr. Kunkushi here prior to re-detention.

"Procedural due process imposes constraints on governmental decisions which deprive individuals of 'liberty' or 'property' interests within the meaning of the Due Process Clause of the Fifth or Fourteenth Amendment." *Mathews v. Eldridge*, 424 U.S. 319, 332 (1976). "The fundamental requirement of due process is the opportunity to be heard at a meaningful time and in a meaningful manner." *Id.* at 333. "Due process, unlike some legal rules, is not a technical conception with a fixed content unrelated to time, place and circumstances. Due process is flexible and calls for such procedural protections as the particular situation demands." *Id.* at 334.

To determine what procedural protections due process requires, courts balance three factors: "(1) the private interest affected; (2) the risk of erroneous deprivation through the procedures used, and the value of additional safeguards; and (3) the government's interest, including the burdens of additional procedural requirements." *Shinault v. Hawks*, 782 F.3d 1053, 1057 (9th Cir. 2015) (citing *Mathews*, 424 U.S. at 335).

1. Private interests affected: Mr. Kunkushi's liberty interest in remaining free from physical restraint.

Mr. Kunkushi has a strong liberty interest in remaining free from physical restraint and avoiding wrongful removal.

"Though the Supreme Court has not attempted to define with exactness the liberty guaranteed in the Fifth and Fourteenth Amendments, it means without doubt not merely freedom from physical restraint, but also the right to work, learn, marry, establish a home, raise children, and all of the privileges essential to the orderly pursuit of happiness." *Nak Kim Chhoeun*, 442 F. Supp. 3d at 1245 (internal quotation marks omitted) *citing Meyer v. Nebraska*, 262 U.S. 390, 399 (1923) (citing fourteen cases).

Further, "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*, 533 U.S. at 690. Therefore, individuals conditionally released from detention have a protected interest in their "continued liberty." *See Young v. Harper*, 520 U.S. 143, 147, 149, 152–53 (1997).

"[T]he Due Process Clause applies to all 'persons' within the United States, including [non-citizens], whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas*, 533 U.S. at 693; *see also Hernandez v. Sessions*, 872 F.3d 976, 981 (9th Cir. 2017) ("the government's discretion to incarcerate non-citizens is always constrained by the requirements of due process").

Mr. Kunkushi has been released from ICE custody since January 6, 2021. *Jensen Decl.*, ¶ 18. He complied with ICE's intensive supervision requirements, including constant electronic monitoring, in person visits, and photo visits. *Kunkushi Decl.*, ¶ ¶ 7–8. He tended to his high medical needs of diabetes and PTSD. *Kunkushi Decl.*, ¶ ¶ 19, 23. He cared for his 12-year-old autistic child. *Kunkushi Decl.*, ¶ 28. He has had no additional contact with law enforcement. *Kunkushi Decl.*, ¶ 8.

Mr. Kunkushi's interest in liberty is particularly high in this case where he has heightened medical needs, need not met while in ICE custody. Mr. Kunkushi has

diabetes and usually take Medformin and Glipitzide, which are oral insulin manage his condition. *Kunkushi Decl.*, ¶ 19. He did not receive his medication upon detention. Nor did he receive any food the whole day of detention, between 10am and 2pm. *Kunkushi Decl.*, ¶ ¶ 15, 20; *Barba Decl.*, ¶ 3. It was not until June 10, 2025 that Mr. Kunkushi was able to see a doctor for his diabetes, at which point his blood sugar was at a dangerously high level of 413. *Kunkushi Decl.*, ¶ 26. He has PTSD given past harm in Nigeria and the poor conditions of detention triggered his PTSD causing him to hear voices. *Kunkushi Decl.*, ¶ 23.

2. Risk of erroneous deprivation: Risks of detaining Mr. Kunkushi without notice.

This Court should weigh the risk of erroneously depriving Mr. Kunkushi of his freedom from detention through the procedures currently used (no notice or informal interview at all), and the value of additional safeguards (notice and an informal interview). *Mathews*, 424 U.S. at 335.

As Mr. Kunkushi's removal order is over five years old, he has been detained without notice, and that he currently faces conditions of detention that pose a risk to his health, the value of additional safeguards of notice is high. *See Nak Kim Chhoeun*, 442 F. Supp. 3d 1233, 1247.

At the time of Mr. Kunkushi's detention he had a signed U-visa certification. As described above, that U visa certification allows him to apply for a U-visa and motion to reopen his removal proceedings. However, his detention on June 4, 2025 interfered with Counsel's ability to file the application as Mr. Kunkushi was unable to contact counsel for 5 days and coordination with Mr. Kunkushi in detention to prepare his application was difficult. *Barba Decl.*, ¶ 5. Notice prior to his re-detention would have allowed Mr. Kunkushi better access to counsel and preparation of his U visa application.

3. Government's interest in removing Mr. Kunkushi without notice.

As in *Kim Chhoeun*, here the "the fiscal and administrative burdens to the government of providing notice before re-detaining Petitioner[ ] is minimal, and the

public interest against giving notice is also low." *Nak Kim Chhoeun*, 442 F. Supp. at 1249 *quoting Mathews*, 424 U.S. at 335, 348 ("the Government's interest, and hence that of the public, in conserving scarce fiscal and administrative resources is a factor that must be weighed").

While the Government may have an interest in "successfully removing deportable non-citizens, ensuring compliance with their orders of supervision, and protecting the public," notice of that an order of supervision is to be revoked prior to revocation is not burdensome and as demonstrated here, can be accomplished with a one page letter. *See Guillermo M.R. V. Kaiser*, Case No. 25-cv-05436-RFL, _F. Supp. 3d_ 2025 WL 1983677 *9 (N.D. Cal. July 17, 2025); *Notice of Revocation*, Exh. A.

III. CONCLUSION

For these reasons, Mr. Kunkushi's detention violates his due process rights, 8 U.S.C. § 1231, 8 C.F.R. § 241.13 and 8 CFR § 241.4. He respectfully requests the Court grant his habeas petition and immediate release from detention.

Dated: July 22, 2025

Respectfully Submitted,

s/Nancy Alexander

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Certificate of Compliance under L.R. 11-6.2

The undersigned, counsel of record for Petitioner, certifies that this brief contains 3,968 words, which complies with the word limit of L.R. 11-6.1.

07/22/2025
Date

s/Nancy Alexander
Nancy Alexander