

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT

for the

FILED BY MCO D.C.

AUG 12 2025

ANGELA E. NOBLE
CLERK U.S. DIST. CT.
S.D. OF FLA. - MIAMIHaytham Fawzi Salah Madhoun

Petitioner

v.

Case No.

(Supplied by Clerk of Court)

Respondent

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

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

Personal Information

1. (a) Your full name: Haytham Fawzi Salah Madhoun
(b) Other names you have used: _____
2. Place of confinement:
(a) Name of institution: El Paso SPC
(b) Address: 8915 Montana Ave El Paso,
TX 79925
(c) Your identification number: 
3. Are you currently being held on orders by:
☐ Federal authorities ☐ State authorities ☒ Other - explain:
Immigration Detention Center
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): _____

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)

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- ☐ 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): _____

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

- (a) Name and location of the agency or court: Immigration Court
201 VARICK ST, 5TH FL RM 507 New York, NY 10014
 (b) Docket number, case number, or opinion number: A-089-520-219
 (c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed): _____

- (d) Date of the decision or action: July 14, 2020

Your Earlier Challenges of the Decision or Action7. **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: _____

(2) Date of filing: _____

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

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(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

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(a) If "Yes," provide:

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

(2) Date of filing: _____

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

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(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: _____

(2) Date of filing: _____

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

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(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

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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: _____

- (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: 02-4-2025(b) Date of the removal or reinstatement order: July 14, 2020

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

☐ Yes☒ No

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If "Yes," provide:

(1) Date of filing: _____

(2) Case number: _____

(3) Result: _____

(4) Date of result: _____

(5) Issues raised: _____

(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: _____

(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: _____

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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. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: I am a Palestinian Refugee born in Israel.

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

Despite of my birth in Jerusalem Israel on [REDACTED] from a Palestinian family. I'm still recognized as a intruder to Israel and a target to be terminated anymoment.

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

☐ Yes

☐ No

GROUND TWO: Palestine does not exist!

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

According to history and all the Holly Books, I came through Gabriel. It is the land God gave to the Jews after Egypt being enslaved in.

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

☐ Yes

☐ No

GROUND THREE: Israel will NEVER Issue a travel document for me. (A Palestinian)

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

ICE has tried to get me a travel document for the Second time from Israel / Jordan / Palestinian but NEVER got approved for another one.

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

☐ Yes

☐ No

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GROUND FOUR: The Isrel war that is happening at the moment, will endanger my life.

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

The inside conflict that's been going on for ever between Hammas and Israel is still a ongoing war with Iran, Yeman, Syring, Lebanon have not stopped either.

(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: I am afraid for my life to be deported to a third Country that I dont speak its language or that would keep me in jail for no reason.

Request for Relief

15. State exactly what you want the court to do: I would like to be free after being detained for 180 days. I would like to fight my case from outside under Supervision.

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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:

8-5-2025

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: 8-5-2025



Signature of Petitioner

Haytham Fawzi Salah Moelham

Signature of Attorney or other authorized person, if any

IMMIGRATION COURT
201 VARICK ST., 5TH FL RM 507
NEW YORK, NY 10014

In the Matter of

MADHOUN, HAYTHAM FAWZI SALAH
Respondent

Case No.:

IN REMOVAL PROCEEDINGS

ORDER OF THE IMMIGRATION JUDGE

This is a summary of the oral decision entered on July 14, 2020
This memorandum is solely for the convenience of the parties. If the proceedings should be appealed or reopened, the oral decision will become the official opinion in the case.

- ☒ The respondent was ordered removed from the United States to or in the alternative to Jordan
- ☐ Respondent's application for voluntary departure was denied and respondent was ordered removed to or in the alternative to .
- ☐ Respondent's application for voluntary departure was granted until upon posting a bond in the amount of \$ _____ with an alternate order of removal to .

Respondent's application for:

- ☒ Asylum was () granted () denied (☒) withdrawn.
- ☒ Withholding of removal was () granted () denied (☒) withdrawn.
- ☐ A Waiver under Section _____ was () granted () denied () withdrawn.
- ☐ Cancellation of removal under section 240A(a) was () granted () denied () withdrawn.

Respondent's application for:

- ☐ Cancellation under section 240A(b)(1) was () granted () denied () withdrawn. If granted, it is ordered that the respondent be issued all appropriate documents necessary to give effect to this order.
- ☐ Cancellation under section 240A(b)(2) was () granted () denied () withdrawn. If granted it is ordered that the respondent be issued all appropriated documents necessary to give effect to this order.
- ☐ Adjustment of Status under Section _____ was () granted () denied () withdrawn. If granted it is ordered that the respondent be issued all appropriated documents necessary to give effect to this order.
- ☒ Respondent's application of (☒) withholding of removal (☒) deferral of removal under Article III of the Convention Against Torture was () granted () denied (☒) withdrawn.
- ☐ Respondent's status was rescinded under section 246.
- ☐ Respondent is admitted to the United States as a _____ until _____.
- ☐ As a condition of admission, respondent is to post a \$ _____ bond.
- ☐ Respondent knowingly filed a frivolous asylum application after proper notice.
- ☐ Respondent was advised of the limitation on discretionary relief for failure to appear as ordered in the Immigration Judge's oral decision.
- ☐ Proceedings were terminated.
- ☐ If you are under a final order of removal, and if you willfully fail or refuse to 1) depart when and as required, 2) make timely application in good faith for any documents necessary for departure, or 3) present yourself for removal at the time and place required, or, if you conspire to or take any action designed to prevent or hamper your departure, you shall be subject to civil money penalty of up to \$799 for each day under

ALIEN NUMBER: 089-526-219

NAME: MADHOUN, HAYTHAM FAWZI SALAH

such violation. (INA section 274D(a)). If you are removable pursuant to INA 237(a), then you shall further be fined and/or imprisoned for up to 10 years. (INA section 243(a)(1)).

[X] Other: knowingly, willingly, and voluntarily withdrew relief
Date: Jul 14, 2020 and accepted request
Find and

FRANCISCO R. PRIETO
Immigration Judge

Appeal: Waived/Reserved Appeal Due By:

by bail

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY: MAIL [M] PERSONAL SERVICE [P] ELECTRONIC SERVICE [E]
TO: [] ALIEN [] ALIEN c/o Custodial Officer [] ALIEN's ATT/REP [] DHS
DATE: 7/14/20 BY: COURT STAFF AFPO
Attachments: [] EOIR-33 [] EOIR-28 [] Legal Services List [] Other

Letter Requesting 180-Day Review & Release from ICE Custody

HAYTHAM FAWZI SALAH MADHOUN

A# 

IMMIGRATION AND CUSTOMS ENFORCEMENT
EL PASO SERVICE PROCESSING CENTER
8915 MONTANA AVE,
EL PASO, TX 79925

8/15/2025

Southern District of Florida
Wilkie D. Ferguson Jr. United States
Courthouse
400 North Miami Avenue
Miami, FL 33128

I am afraid for my life to be deported to any country, such as "africa"/ "Mexico, Honduras, El Salvador, etc". I am detained with people from these countries and I see the bad behavior and all the fights in the facility. It terrifies me! I don't speak any of these languages countries. I was born in israel for a refugee family, palestine is not a state. Israel will never give a travel document because of the religious war.

The judge told me when he order me deportaion that 'im not going to anywhere' so the deportaion was a 'win' for my case and that way I can stay in the inited states due to complications in 'israel'.

The crime I got convicted for is over with, I did my time, I was on probation and I paid all my fines. Regarding to the exeptional situation in israel, I don't desrve to remain in 'ice' custody for more than six months .

IM NOT TRYING TO FIGHT MY CASE OR SO, I JUST DONT DESERVE TO BE LOCKED UO IN 'ICE' CUSTOIDY JUST FOR NO REASON REALY. OLEASE HELP ME TO BE RELASED ON SUPERVISION AT LEAST TILL THE WAR IS OVE AND THEN 'ICE' CAN DEPORT ME BACK TO ISRAEL.

THE SITUATION IS VERY BAD IN ISRAEL, STARVATION AND GENOCIDE. CAN YOU PLEASE GIVE ME A NOTHER CHANCE TO LIVE. I MEAN PRETTY PLEASE I BEG YOUR PARDON. ITS NOT MY FAULT THAT I WAS BORN A PALESTINIAN. ON TOP OF IT A REFUGEE IN MY BIRTH PACE, I MEAN THINGS GETTING OUT CONTROL ON ITS OWN, NOT BECAUSE OF ME.

I WANT TO LIVE, PLEASE HELP ME. MY PARENTS BOTH DIED BEFORE THE HIT 50 YEARS OLD BECAUSE OF SICKNESS, DIABETIC AND KIDNEY FAILURE AND HEART ATTACK, MY DAD WAS 49, MY WAS 47. IM 44 NOW, GUESS HOW MUCH LONGER?

PLEASE GIVE A CHANCE TO LIVE MY LAST DAYS HAPPY AND FREE FROM ALL THE WAR OVERSEAS. PLEASE HELP ME. IM NOT ASKING ANYTHING BESIDES TO BE ABLE TO LIVE, AND ANYWHERE ELSE BESIDES THE U.S. IS TOTALLY MEANS MY DEATH AND IM AFRAID FOR MY LIFE.

PLEASE DONT SEND ME ANYWHERE ELSE. DONT KILL ME. MIGHT AS WELL EXCUTE ME HERE IN AMERICA. THATS A TRUTH. MY LIFE IS NOT A GAME AND I HAVE THE RIGHT TO LIVE.

I request that ICE review my custody status while taking the following information into consideration, because I believe I qualify for release under an order of supervision. I have been in detention for more than "180-days" / "SIX MONTHS" after my removal order became final on July/14/2020, and it is unlikely that I will be deported to ISRAEL in the reasonably foreseeable future because of the war. I am not a danger to public safety, and nor am I a flight risk.

I entered the United States on 2006. My home country will not accept my deportation, because OF THE WAR IN ISRAEL. I AM NOT A DANGER TO PUBLIC SAFETY.

I, "HAYTHAM FAWZI SALAH MADHOUN", WAS BORN IN JERUSALEM, ISRAEL ON [REDACTED] FOR A REFUGEE PALESTINIAN FAMILY. GRADUATED HIGH SCHOOL IN THE YEAR OF "2000", GOT A BACHELOR DEGREE IN ENGLISH TRANSLATION FROM ALMUSTNSRYA UNIVERSITY IN BAGHDAD, IRAQ, I WANTED A MASTER DEGREE IN ENGLISH TRANSLATION, SO I GOT MY STUDENT VISA FROM THE AMERICAN EMBASSY IN JERUSALEM, ISRAEL. AND CAME TO THE UNCG, GREENSBORO, NC. IN "2006". AFTER THREE MONTHS OF GOING TO SCHOOL AT UNCG, MY FATHER HAD A SUDDEN DEATH AT AGE "49" DUE TO A HEART ATTACK. THAT MADE IT HARD ON ME TO FINISH MY MASTER SINCE HE WAS MY ONLY FINANCIAL SUPPORT. I DIDNT GIVE UP, I TRANSFER TO "KAPLAN" SCHOOL IN WINSTON-SALEM, NC. TO GRADUATE A "12 COURSE" PROGRAM IN ENGLISH AS A SECOND LANGUAGE. WHILE I WAS IN SCHOOL, I MET MY EX WIFE "HALLIE JEAN BILLINGS" AND HAPPILY GOT MARRIED FOR "SEVEN YEARS". AFTER WE GOT DIVORCED IN "2013" I MOVED NEW ALBANY, MS TO SERVE THE COMMUNITY WORKING AS A CASHIER AT "QUICK STOP" STORE. I MET MY EX GIRLFRIEND "AMBER NICHOLAS" WHOM I DATED FOR THREE YEARS, I WAS GOING TO HER HOUSE NORMALLY ALMOST EVERYDAY TO BE WITH HER. I TOOK CARE OF HER FINANCIAL NEEDS ON TOP OF MINE FROM HER GAS BILL TO ELECTRIC BILL, I ALSO PUT FOOD ON HER TABLE AND EVEN PAID SOME OF HER RENT. ON A SUNDAY WAS SEPTEMBER/19/2016 I DROVE TO HER HOUSE, I PULLED IN HER DRIVE WAY, I GOT SHOCKED TO SEE HER NAKED IN ANOTHER MAN CAR. I GOT OUT THE CAR AND WENT INSIDE AND I TALKED TO HER MOM SHORTLY. THAT MAN LEFT WITHOUT SAYING ANYTHING, SHE GOT BACK INSIDE THE HOUSE LIKE NOTHING HAPPEN. I DID NOT CONFRONT HER. I JUST LEFT WITHOUT ARGUING BECAUSE I DONT BELIEVE IN A ARGUMENTS OR VIOLENCE TO SOLVE ANY SITUATION THAT ALREADY TOOK PLACE. ON SEPTEMBER/21/2016 TWO DETECTIVES CAME TO WORK AND ARRESTED ME WITH A "BURGLARY OF OCCUPIED DWELLING" CHARGE, I WAS VERY SHOCKED FOR THE CHARGE THEY CHARGED ME WITH. SHE GAVE THE POLICE A "FALSE STATEMENT" AS DIRECTED BY THE OTHER 'MAN' SHE WAS WITH IN THE CAR, SO HE GETS ME COMPLETELY OUT OF THE SEEN. I HIRE A "15000\$" LAWYER, 'TONI FARES', AND HE GOT ME A DEAL TO PLEA GUILTY FOR "5 YEARS" TO SERVE, "10 SUSPENDED", "5 ON PAPERS". ALL SHE HAD TO SAY THAT "SHE WAS SCARED OF ME AT THE TIME WHEN I SHOWED UP AT HER HOUSE". AND THERE IS "NO WAY" I CAN BEAT THAT IN A TRIAL AS I WAS TOLD BY MY LAWYER. I DID MY TIME, REPORTED MONTHLY TO MY PROBATION OFFICER, PAYING ALL MY DUES UNTIL I GOT MY GOLDEN SEAL FROM THE STATE OF MISSISSIPPI IN THE YEAR OF "2024".

I am not a significant flight risk, because I will live at [REDACTED] TX 75062] with ([HAYTHAM HUSSEIN, PHONE: [REDACTED]). If released, I will concentrate on working and supporting my family. I has cooperated fully with all efforts by "ICE" to remove me from the United States. I have done EVERYTHING to help "ICE" apply for your travel documents. I have signed a travel document applications FOR "ISRAEL/JORDAN/PALESTINIAN AUTHORITY". AND other papers, provided MY Deportation Office with information about when and where you were born, I ALSO provided ICE with photographs, fingerprints, identity documents. I am prepared to comply with all restrictions imposed on me as part of my release. I have cooperated with ICE's efforts to remove me from the United States.

I will comply with all conditions placed on my release. I has cooperated fully with all efforts by ICE to remove Petitioner from the United States. I have done EVERYTHING to help ICE apply for your travel documents. I HAVE SIGNED ALL THE TRAVEL DOCUMENT APPLICATIONS FOR "ISRAEL/JORDAN/ PALESTINIAN AUTHORITY". AND OTHER PAPERS, PROVIDED BY MY DEPORTATION OFFICER GARCIA, C., I GIVE ALL THE NEEDED INFORMATION FOR EACH DOCUMENT, SIGNATURE, FINGER PRINT, AN PHOTOS AS WELL.

For these reasons, I respectfully request that I be released under an order of supervision so that I may join my family, return to lawful employment, and no longer be a financial burden to my family or society.

Respectfully Submitted,

signature:



printed name:



HAYTHAM FAWZI SALAH MADHOUN

A 

DATE: 8/15/2025

EL PASO TX 798

7 AUG 2025 AM 2 L

ICE PROCESSING CENTER
8915 MONTANA
EL PASO, TX 79925

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