

**PETITION UNDER 28 U.S.C. § 2254 FOR WRIT OF
HABEAS CORPUS BY A PERSON IN STATE CUSTODY**

FILED 1 OF 21
RECEIVED — LODGED
— COPY

AUG 29 2025

CLERK U S DISTRICT COURT
DISTRICT OF ARIZONA
BY [REDACTED] DEPUTY

United States District Court	District: FOR THE DISTRICT OF Arizona
Name (under which you were convicted): aria Janai Woods on behalf of Marlon Garth Anthony Parris	Docket or Case No.: [REDACTED]
Place of Confinement : Florence Correctional Center	Prisoner No.: [REDACTED]
Petitioner (include the name under which you were convicted) aria Janai Woods on behalf of Marlon Garth Anthony Parris	Respondent (authorized person having custody of petitioner) Merrick Garland, Attorney General of the UNITED STATES, Alejandro Mayorkas, Secretary of THE DEPARTMENT OF HOMELAND SECURITY
The Attorney General of the State of: THE UNITED STATES	ICE ENFORCEMENT & REMOVAL Operations (PHOENIX Field Office). Respondent

PETITION

1. (a) Name and location of court that entered the judgment of conviction you are challenging. (THIS DOCUMENT IS NOT IN PROPER FORM ACCORDING TO FEDERAL AND/OR LOCAL RULES AND PRACTICES)

PHOENIX FIELD OFFICE

3260 North PINAL PARKWAY
Florence, Az 85132

(b) Criminal docket or case number (if you know):

2. (a) Date of the judgment of conviction (if you know):

June 16, 2010?

REFERENCE Ekarp S.Y.
(Male Plumber (20))

Length of sentence 5 228

(b) Date of sentencing: 7/31/2020

3. Length of sentence: 5 years

4. In this case, were you convicted on more than one count or of more than one crime? Yes No

5. Identify all crimes of which you were convicted and sentenced in this case: In 2010, Marion

Garth Anthony Parris was convicted in Federal Court of participating in a conspiracy involving the interstate transportation of cocaine and drug proceeds using chartered flights between Los Angeles & Baltimore, part of what the DEA identified as "Operation Snowbird." He served the full term of his sentence and has since reintegrated into society with no further criminal violations.

6. (a) What was your plea? (Check one)

(1) Not guilty (3) Nolo contendere (no contest)
 (2) Guilty (4) Insanity plea

AO 241 (Rev. 09/17)

(b) If you entered a guilty plea to one count or charge and a not guilty plea to another count or charge, what did you plead guilty to and what did you plead not guilty to? _____

(c) If you went to trial, what kind of trial did you have? (Check one)

Jury Judge only

7. Did you testify at a pretrial hearing, trial, or a post-trial hearing?

Yes No

8. Did you appeal from the judgment of conviction?

Yes No

9. If you did appeal, answer the following:

(a) Name of court: _____

(b) Docket or case number (if you know): _____

(c) Result: _____

(d) Date of result (if you know): _____

(e) Citation to the case (if you know): _____

(f) Grounds raised: _____

(g) Did you seek further review by a higher state court? Yes No

If yes, answer the following:

(1) Name of court: _____

(2) Docket or case number (if you know): _____

(3) Result: _____

AO 241 (Rev. 09/17)

(4) Date of result (if you know): _____

(5) Citation to the case (if you know): _____

(6) Grounds raised: _____

(h) Did you file a petition for certiorari in the United States Supreme Court? Yes No

If yes, answer the following:

(1) Docket or case number (if you know): _____

(2) Result: _____

(3) Date of result (if you know): _____

(4) Citation to the case (if you know): _____

10. Other than the direct appeals listed above, have you previously filed any other petitions, applications, or motions concerning this judgment of conviction in any state court? Yes No

11. If your answer to Question 10 was "Yes," give the following information:

(a) (1) Name of court: _____

(2) Docket or case number (if you know): _____

(3) Date of filing (if you know): _____

(4) Nature of the proceeding: _____

(5) Grounds raised: _____

(6) Did you receive a hearing where evidence was given on your petition, application, or motion?

Yes No

(7) Result: _____

AO 241 (Rev. 09/17)

(8) Date of result (if you know): _____

(b) If you filed any second petition, application, or motion, give the same information:

(1) Name of court: _____

(2) Docket or case number (if you know): _____

(3) Date of filing (if you know): _____

(4) Nature of the proceeding: _____

(5) Grounds raised: _____

(6) Did you receive a hearing where evidence was given on your petition, application, or motion?

 Yes No

(7) Result: _____

(8) Date of result (if you know): _____

(c) If you filed any third petition, application, or motion, give the same information:

(1) Name of court: _____

(2) Docket or case number (if you know): _____

(3) Date of filing (if you know): _____

(4) Nature of the proceeding: _____

(5) Grounds raised: _____

(6) Did you receive a hearing where evidence was given on your petition, application, or motion?

 Yes No

(7) Result: _____

(8) Date of result (if you know): _____

(d) Did you appeal to the highest state court having jurisdiction over the action taken on your petition, application, or motion?

(1) First petition: Yes No(2) Second petition: Yes No(3) Third petition: Yes No

(e) If you did not appeal to the highest state court having jurisdiction, explain why you did not:

12. For this petition, state every ground on which you 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.

CAUTION: To proceed in the federal court, you must ordinarily first exhaust (use up) your available state-court remedies on each ground on which you request action by the federal court. Also, if you fail to set forth all the grounds in this petition, you may be barred from presenting additional grounds at a later date.

GROUND ONE: Ice Detained him WITHOUT NEW CAUSE.

(a) Supporting facts (Do not argue or cite law. Just state the specific facts that support your claim.):

Despite this, IN 2025, ICE DETAINED HIM WITHOUT NEW CAUSE, AND IN CONTRADICTION TO PRIOR WRITTEN CORRESPONDANCE INDICATING HE WOULD NOT be detained. He IS now held WITHOUT BOND AND DENIED MEANINGFUL REVIEW.(b) If you did not exhaust your state remedies on Ground One, explain why: THE SUPPOSED LAWYER DOES NOT HAVE A proffessional licensed to practice law in Arizona, WHICH WAS PERCIEVED AS A licensed practicing ATTORNEY BY HIS EX-WIFE TANISHA LYNN Hartwell, WHOSE NAME BY legal STATUS AS ROOSHELLE HARTWELL WHO IS ALSO FROM TRINADAD AND HAS CHANGED HER LEGAL NAME TOO MISS TANISHA LYNN HARTWELL. AN Illegal ALIEN, AND THEY ARE NO LONGER MARRIED.

(c) **Direct Appeal of Ground One:**(1) If you appealed from the judgment of conviction, did you raise this issue? Yes No

(2) If you did not raise this issue in your direct appeal, explain why:

(d) **Post-Conviction Proceedings:**

(1) Did you raise this issue through a post-conviction motion or petition for habeas corpus in a state trial court?

 Yes No

(2) If your answer to Question (d)(1) is "Yes," state:

Type of motion or petition:

Name and location of the court where the motion or petition was filed:

Docket or case number (if you know):

Date of the court's decision:

Result (attach a copy of the court's opinion or order, if available):

(3) Did you receive a hearing on your motion or petition?

 Yes No

(4) Did you appeal from the denial of your motion or petition?

 Yes No

(5) If your answer to Question (d)(4) is "Yes," did you raise this issue in the appeal?

 Yes No

(6) If your answer to Question (d)(4) is "Yes," state:

Name and location of the court where the appeal was filed:

Docket or case number (if you know):

Date of the court's decision:

Result (attach a copy of the court's opinion or order, if available):

(7) If your answer to Question (d)(4) or Question (d)(5) is "No," explain why you did not raise this issue:

'BECAUSE HE (Marlon Garth ANTHONY Parris) PLED
Guilty.'

(e) **Other Remedies:** Describe any other procedures (such as habeas corpus, administrative remedies, etc.) that you have used to exhaust your state remedies on Ground One: NO OTHER REMEDIES WERE EXHAUSTED.

GROUND TWO: THIS Petition violates his Fifth Amendment RIGHT TO DUE PROCESS.

(a) Supporting facts (Do not argue or cite law. Just state the specific facts that support your claim.):

Petitioner Alleges this DETENTION violates his Fifth Amendment right to DUE process, is not supported by current or ACTIONABLE GROUNDS for Removal, AND CONSTITUTES unlawful CONTINUED CUSTODY UNDER 28 U.S.C. § 2241.

(b) If you did not exhaust your state remedies on Ground Two, explain why: THERE WAS NO personal income to support legal fees.

(c) **Direct Appeal of Ground Two:**

(1) If you appealed from the judgment of conviction, did you raise this issue? Yes No

(2) If you did not raise this issue in your direct appeal, explain why: _____

(d) **Post-Conviction Proceedings:**

(1) Did you raise this issue through a post-conviction motion or petition for habeas corpus in a state trial court? Yes No

(2) If your answer to Question (d)(1) is "Yes," state: _____

Type of motion or petition: _____

Name and location of the court where the motion or petition was filed: _____

Docket or case number (if you know): _____

Date of the court's decision: ?

Result (attach a copy of the court's opinion or order, if available):

(3) Did you receive a hearing on your motion or petition?

 Yes No

(4) Did you appeal from the denial of your motion or petition?

 Yes No

(5) If your answer to Question (d)(4) is "Yes," did you raise this issue in the appeal?

 Yes No

(6) If your answer to Question (d)(4) is "Yes," state:

Name and location of the court where the appeal was filed:

Docket or case number (if you know):

Date of the court's decision:

Result (attach a copy of the court's opinion or order, if available):

(7) If your answer to Question (d)(4) or Question (d)(5) is "No," explain why you did not raise this issue:

Because HE PLED Guilty.(e) **Other Remedies:** Describe any other procedures (such as habeas corpus, administrative remedies, etc.) that you have used to exhaust your state remedies on Ground Two:**GROUND THREE:**

(a) Supporting facts (Do not argue or cite law. Just state the specific facts that support your claim.):

AO 241 (Rev. 09/17)

(b) If you did not exhaust your state remedies on Ground Three, explain why:

(c) **Direct Appeal of Ground Three:**

(1) If you appealed from the judgment of conviction, did you raise this issue?

 Yes No

(2) If you did not raise this issue in your direct appeal, explain why:

(d) **Post-Conviction Proceedings:**

(1) Did you raise this issue through a post-conviction motion or petition for habeas corpus in a state trial court?

 Yes No

(2) If your answer to Question (d)(1) is "Yes," state:

Type of motion or petition:

Name and location of the court where the motion or petition was filed:

Docket or case number (if you know):

Date of the court's decision:

Result (attach a copy of the court's opinion or order, if available):

(3) Did you receive a hearing on your motion or petition?

 Yes No

(4) Did you appeal from the denial of your motion or petition?

 Yes No

(5) If your answer to Question (d)(4) is "Yes," did you raise this issue in the appeal?

 Yes No

(6) If your answer to Question (d)(4) is "Yes," state:

Name and location of the court where the appeal was filed:

?

Docket or case number (if you know):

Date of the court's decision:

Result (attach a copy of the court's opinion or order, if available):

(7) If your answer to Question (d)(4) or Question (d)(5) is "No," explain why you did not raise this issue:

Because he (Marlon Garth Anthony Parris) pleaded
Guilty

(e) **Other Remedies:** Describe any other procedures (such as habeas corpus, administrative remedies, etc.) that you have used to exhaust your state remedies on Ground Three: _____

GROUND FOUR: _____

(a) Supporting facts (Do not argue or cite law. Just state the specific facts that support your claim.):

(b) If you did not exhaust your state remedies on Ground Four, explain why:

(c) **Direct Appeal of Ground Four:** _____

(1) If you appealed from the judgment of conviction, did you raise this issue? Yes No

(2) If you did not raise this issue in your direct appeal, explain why:

(d) **Post-Conviction Proceedings:** _____

(1) Did you raise this issue through a post-conviction motion or petition for habeas corpus in a state trial court?
 Yes No

(2) If your answer to Question (d)(1) is "Yes," state:
Type of motion or petition: _____

AO 241 (Rev. 09/17)

Name and location of the court where the motion or petition was filed: _____

Docket or case number (if you know): _____

Date of the court's decision: _____

Result (attach a copy of the court's opinion or order, if available): _____
_____(3) Did you receive a hearing on your motion or petition? Yes No(4) Did you appeal from the denial of your motion or petition? Yes No(5) If your answer to Question (d)(4) is "Yes," did you raise this issue in the appeal? Yes No

(6) If your answer to Question (d)(4) is "Yes," state: _____

Name and location of the court where the appeal was filed: _____
_____Docket or case number (if you know): _____
_____Date of the court's decision: _____
_____Result (attach a copy of the court's opinion or order, if available): _____
_____(7) If your answer to Question (d)(4) or Question (d)(5) is "No," explain why you did not raise this issue:

_____(e) **Other Remedies:** Describe any other procedures (such as habeas corpus, administrative remedies, etc.) that you have used to exhaust your state remedies on Ground Four: _____

13. Please answer these additional questions about the petition you are filing:

(a) Have all grounds for relief that you have raised in this petition been presented to the highest state court having jurisdiction? Yes No

If your answer is "No," state which grounds have not been so presented and give your reason(s) for not presenting them: _____

(b) Is there any ground in this petition that has not been presented in some state or federal court? If so, which ground or grounds have not been presented, and state your reasons for not presenting them:

Petitioner Alleges this DETENTION violates his Fifth Amendment.

14. Have you previously filed any type of petition, application, or motion in a federal court regarding the conviction that you challenge in this petition? Yes No

If "Yes," state the name and location of the court, the docket or case number, the type of proceeding, the issues raised, the date of the court's decision, and the result for each petition, application, or motion filed. Attach a copy of any court opinion or order, if available. _____

15. Do you have any petition or appeal now pending (filed and not decided yet) in any court, either state or federal, for the judgment you are challenging? Yes No

If "Yes," state the name and location of the court, the docket or case number, the type of proceeding, and the issues raised. _____

16. Give the name and address, if you know, of each attorney who represented you in the following stages of the judgment you are challenging:

(a) At preliminary hearing: DOUGLAS Kouffie,
DIAMONDBACK Legal STAFF, 3101 Central Ave, Suite 1150 suit 1150
PHOENIX, AZ 85012

(b) At arraignment and plea: _____

(c) At trial: _____

(d) At sentencing: _____

(e) On appeal: _____

(f) In any post-conviction proceeding: _____

(g) On appeal from any ruling against you in a post-conviction proceeding: _____

Removal

17. Do you have any future sentence to serve after you complete the sentence for the judgment that you are challenging? Yes No

(a) If so, give name and location of court that imposed the other sentence you will serve in the future:

(b) Give the date the other sentence was imposed: _____

(c) Give the length of the other sentence: _____

(d) Have you filed, or do you plan to file, any petition that challenges the judgment or sentence to be served in the future? Yes No

18. TIMELINESS OF PETITION: If your judgment of conviction became final over one year ago, you must explain why the one-year statute of limitations as contained in 28 U.S.C. § 2244(d) does not bar your petition.*

* The Antiterrorism and Effective Death Penalty Act of 1996 ("AEDPA") as contained in 28 U.S.C. § 2244(d) provides in part that:

- (1) A one-year period of limitation shall apply to an application for a writ of habeas corpus by a person in custody pursuant to the judgment of a State court. The limitation period shall run from the latest of -
 - (A) the date on which the judgment became final by the conclusion of direct review or the expiration of the time for seeking such review;
 - (B) the date on which the impediment to filing an application created by State action in violation of the Constitution or laws of the United States is removed, if the applicant was prevented from filing by such state action;
 - (C) the date on which the constitutional right asserted was initially recognized by the Supreme Court, if the right has been newly recognized by the Supreme Court and made retroactively applicable to cases on collateral review; or
 - (D) the date on which the factual predicate of the claim or claims presented could have been discovered through the exercise of due diligence.

(2) The time during which a properly filed application for State post-conviction or other collateral review with respect to the pertinent judgment or claim is pending shall not be counted toward any period of limitation under this subsection.

Therefore, petitioner asks that the Court grant the following relief: Petitioner SEEKS AN IMMEDIATE habeas hearing And release. Petitioner respectfully request THIS court to: ISSUE AN order to show Cause to ICE to JUSTIFY THE DETENTION; GRANT A Writ of or any other relief to which petitioner may be entitled. HABEAS Corpus for Immediate Release; PROVID ANY OTHER RELIEF the Court DEEMS JUST And proper.

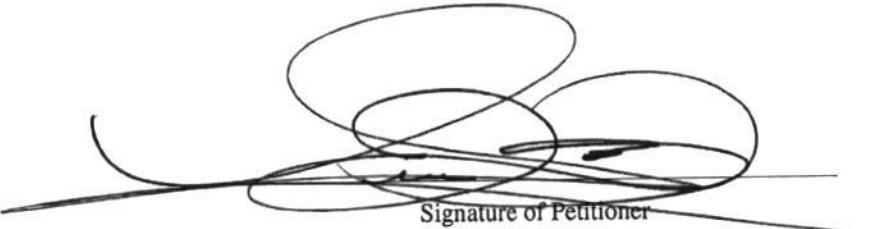
PRO PER

Signature of Attorney (if any)



I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct and that this Petition for Writ of Habeas Corpus was placed in the prison mailing system on August 25, 2025 (month, date, year).

Executed (signed) on August 25, 2025 (date).



Signature of Petitioner

If the person signing is not petitioner, state relationship to petitioner and explain why petitioner is not signing this petition.

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
Immigration Court – Florence, Arizona

In the Matter of:
Marlon Garth Anthony Parris
A# 

MOTION TO REOPEN AND REQUEST FOR STAY OF REMOVAL

Honorable Immigration Judge:

I respectfully submit this motion on behalf of Marlon Garth Anthony Parris, a U.S. military veteran currently detained at CoreCivic Florence Correctional Center. The undersigned requests that the Court reopen proceedings and issue a stay of removal pending consideration of humanitarian and equitable factors.

1. Background:

Respondent is a U.S. military veteran who honorably served this country.

He has already completed his sentence for a nonviolent felony drug conviction and has since taken steps toward rehabilitation.

ICE previously issued a letter stating that he would not be detained, creating a reasonable expectation of release.

2. Grounds for Reopening:

Veteran Status & Rehabilitation: Removal of U.S. veterans contradicts principles of justice and public policy, especially given rehabilitation and contributions to this nation.

Humanitarian Considerations: Respondent has significant ties to the United States, including family and community support. Removal would cause extraordinary hardship.

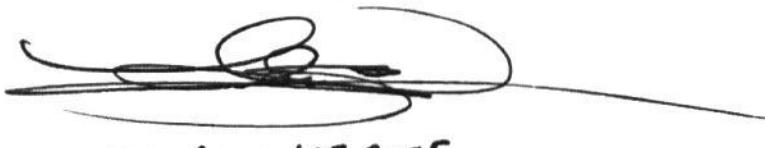
Equitable Factors: Respondent has already served his time, and further detention serves no rehabilitative or public safety purpose.

3. Relief Requested:

Reopen proceedings in light of new and compelling humanitarian evidence.

Grant a stay of removal pending final adjudication.

Respectfully submitted,
Aria Janai Woods, Fiancé

A handwritten signature in black ink, appearing to read "Aria Janai Woods", is written over a horizontal line. The signature is fluid and cursive, with a large, stylized 'A' at the beginning.

Date: August 25, 2025

Aria Janai Woods



August 25, 2025

To Whom It May Concern at U.S. Immigration and Customs Enforcement / Congressional Office:

I am writing on behalf of Marlon Garth Anthony Parris, A#  a U.S. military veteran currently detained at the CoreCivic facility in Florence, Arizona since January 7, 2025.

Marlon Garth Anthony Parris honorably served this country but is now facing deportation despite his military service, rehabilitation, and deep ties to the United States. He has already served his sentence for a nonviolent felony drug conviction and has worked to rebuild his life.

It is especially concerning that ICE previously issued a letter assuring that he would not be detained, yet he remains in custody. This prolonged detention and threat of removal disregards both his service to our nation and the humanitarian considerations recognized by ICE policy regarding U.S. veterans.

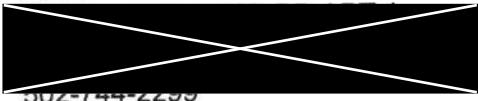
I respectfully request that your office intervene to support a stay of removal, humanitarian parole, or prosecutorial discretion in this case. As a veteran, Marlon Garth Anthony Parris deserves recognition of his service and an opportunity to remain in the country he defended.

Thank you for your attention and assistance.

Respectfully,
Aria Janai Woods



Aria Janai Woods



502-744-2295

Waterbearcare@gmail.com

August 25, 2025

To Whom It May Concern,

I am writing this letter in strong support of Marlon Garth Anthony Parris, who is currently being detained at CoreCivic Florence Detention Center in Florence, Arizona.

Marlon Garth Anthony Parris is not only a member of our community, but also a United States military veteran who has already served his sentence for a non-violent felony conviction. Despite completing his time and even receiving documentation from ICE that he would not be detained, he has been held in custody since January 22, 2025.

As a community member, I believe that continued detention under these circumstances is both unjust and harmful. Marlon Garth Anthony Parris has served our country honorably, paid his debt to society, and deserves the chance to rebuild his life as a contributing member of our community. His military service and rehabilitation efforts demonstrate that he is not a threat to public safety.

I respectfully urge you to consider his release. Prolonged detention only causes unnecessary hardship to him, his loved ones, and our community. He deserves the opportunity to reunite with family, access veterans' support programs, and move forward in a positive direction.

Thank you for your time and consideration. I strongly support his immediate release.

Sincerely,

Aria Janai Woods



Aria Janai Woods



Waterbearcare@gmail.com

August 25, 2025

To Whom It May Concern,

I am writing this letter in strong support of Marlon Garth Anthony Parris, who is currently being detained at CoreCivic Florence Detention Center in Florence, Arizona.

Marlon Garth Anthony Parris is not only a member of our community, but also a United States military veteran who has already served his sentence for a non-violent felony conviction.

Despite completing his time and even receiving documentation from ICE that he would not be detained, he has been held in custody since January 22, 2025.

As a community member, I believe that continued detention under these circumstances is both unjust and harmful. Marlon Garth Anthony Parris has served our country honorably, paid his debt to society, and deserves the chance to rebuild his life as a contributing member of our community. His military service and rehabilitation efforts demonstrate that he is not a threat to public safety.

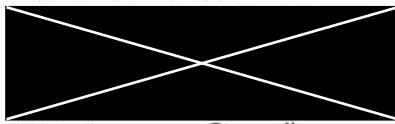
I respectfully urge you to consider his release. Prolonged detention only causes unnecessary hardship to him, his loved ones, and our community. He deserves the opportunity to reunite with family, access veterans' support programs, and move forward in a positive direction.

Thank you for your time and consideration. I strongly support his immediate release.

Sincerely,

A handwritten signature in black ink that reads "ARIA WOODS". The signature is fluid and cursive, with "ARIA" on top and "WOODS" on the line below. There is a large, stylized, oval-shaped flourish or underline drawn below the signature.

Aria Janai Woods



Waterbearcare@gmail.com

August 25, 2025

To Whom It May Concern,

I am writing this letter in strong support of Marlon Garth Anthony Parris, who is currently being detained at CoreCivic Florence Detention Center in Florence, Arizona.

Marlon Garth Anthony Parris is not only a member of our community, but also a United States military veteran who has already served his sentence for a non-violent felony conviction. Despite completing his time and even receiving documentation from ICE that he would not be detained, he has been held in custody since January 22, 2025.

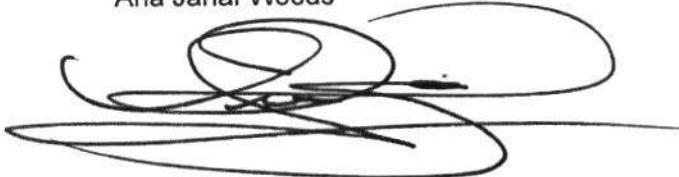
As a community member, I believe that continued detention under these circumstances is both unjust and harmful. [Veteran's Name] has served our country honorably, paid his debt to society, and deserves the chance to rebuild his life as a contributing member of our community. His military service and rehabilitation efforts demonstrate that he is not a threat to public safety.

I respectfully urge you to consider his release. Prolonged detention only causes unnecessary hardship to him, his loved ones, and our community. He deserves the opportunity to reunite with family, access veterans' support programs, and move forward in a positive direction.

Thank you for your time and consideration. I strongly support his immediate release.

Sincerely,

Aria Janai Woods

A handwritten signature in black ink, appearing to read 'Aria Janai Woods', with a stylized flourish at the end.