

UNITED STATES DISTRICT COURT
District of Arizona

Civil Action No.:

Vida Ven,
Petitioner
Vs.

Luis Rosa, Jr., Warden Central Arizona
Florence Correction Complex
and
Joshua Johnson, Director,
Immigration and Customs Enforcement,
Enforcement and Removal Operations,
Dallas TX
Respondents

Petition for Writ of Habeas Corpus
Agency File Number:
A [REDACTED]

INTRODUCTION

1. The Petitioner is, Vida Ven, a Cambodian Man who is currently about 49 years of age who came to the United States as a spouse entering as a Permanent Resident in 24-Aug-2002. Mr. Ven had marital troubles and, those troubles gave rise to his being ordered removed – after appeals – in 2011. In 2016 he met his current wife Cendy Chhim, a Permanent Resident, and he has shared his life with her since. They have 2 children, 8 years and 4 years, they own and operate a donut shop and own real estate where they live in Lamesa TX. He was taken into Immigration Custody in May 15, 2025 and, as of today, he believes that his removal order will be executed and he will be sent to Cambodia on September 1, 2025.
2. On July 28, 2025, Mr. Ven, through his counsel, filed a Motion to Reopen his Immigration Matters so he can apply for Cancellation of Removal (and stay) and a Motion for an Emergency Stay of Removal. Those papers were accompanied by a draft Cancellation of Removal Application setting out details supporting the relief sought. The Motion to Reopen has been Docketed – but undecided – by the Board Of Immigration Appeals. The Motion for Stay was denied this 08/29/2025. We have

asked Immigration and Customs Enforcement to join in the Motion to Reopen and there has been no reply from the Dallas office of ICE Counsel.

PARTIES

3. Petitioner Vida Ven is man who in the Central Arizona Florence Correctional Complex at 1155 North Pinal Parkway, Florence AZ 85132.
4. Respondent **Joshua Johnson Field Office Director of Immigrations and Customs Enforcement and Removal Operations in Dallas Texas**. He is responsible for the direction of many workers within Enforcement and Removal Operations. **Joshua Johnson assigned the location of custody of the Petitioner and is a Jailer of fact.** His Service address is: Joshua Johnson, Director, USCIS ICE ERO, Dallas Field Office, 8101 N Stemmons Frwy, Dallas TX 75247.
5. The immediate jailer of the Plaintiff is Warden Luis Rosa Jr. of the Central Arizona Florence Correctional Complex. His service address is 1155 North Pinal Parkway, Florence AZ 85132. **He is the immediate jailer of the Petitioner-Plaintiff, Vida Ven.**

JURISDICTION AND VENUE

6. The Court has jurisdiction pursuant to 28 U.S.C. § 2241.
7. Venue lies in the District of Arizona because the Petitioner's Immediate jailer is currently within the State of Arizona.

FACTS

8. Petitioner Vida Ven has been in the United States since 2002.
9. He was taken into custody and is presently being held at the Central Arizona Florence Correctional Complex (Jail) in immigration detention. His present address is 1155 North Pinal Parkway, Florence AZ 85132.

CLAIM FOR RELIEF

Count 1 – Writ of Habeas Corpus

10. **The Petitioner has been here since 2002.** He arrived as Permanent Resident, based on marriage. That marriage encountered trouble and this led to Mr. Ven being ordered deported.
11. Since his 2011 removal order, he has married and established a life in Texas. He and his Permanent Resident wife have 2 young children, own and operate a profitable donut shop and own real property. Ven's wife is awaiting retest of her writing skills to become a US Citizen. They are established here in the United States.
12. Ven has asked for his Immigration Court Matter to be reopened so he may apply for Cancellation of Removal, allowing him to stay in the United States.
13. The taking into Custody by ICE unreasonably deprives the Petitioner of his freedom.
14. Further Detention of the Petitioner will deprive him of his ability to reopen his Immigration Court matter and seek permanent status with his family in the United States.

PRAYER FOR RELIEF

Wherefore, Petitioner asks this Court to Grant the following relief:

- a. An order prohibiting the Petitioner continuing in custody and prohibiting him from being taken from the United States.
- b. A writ of habeas corpus ordering that Petitioner be released forthwith;
- c. That he has unfettered access to counsel, before and during any interviews as required by the INA, 5 USC 555(b).
- d. Attorney's fees under the Equal Access to Justice Act, 28 U.S.C. § 2412(d) and 5 U.S.C. § 504 *et seq.*, if applicable; and
- e. Any other relief this Court deems just and proper.

Respectfully submitted
Attorney for the Petitioner

/s/ Thomas Stylianos, Jr

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Appearing Pro Hac Vice on a PHV Petition
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Attached Exhibits:

1. Affidavit in Support of Petition
2. Pending (BIA) Motion to Reopen
and Draft Cancellation of Removal
Application

Dated: 09/02/2025