

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

UNITED STATES DISTRICT COURT

for the
Northern District of Texas

NOEL JUNIOR TCHANGO

Petitioner

v.

MARCELLO VILLEGAS WARDEN
BLUE BONNET DETENTION FACILITY, DHS, USICE
ATTORNEY GENERAL

Respondent

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

U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

FILED

OCT - 7 2025

CLERK, U.S. DISTRICT COURT

By

Deputy

Case No.

(Supplied by Clerk of Court)

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

Personal Information

1. (a) Your full name: NOEL JUNIOR TCHANGO
(b) Other names you have used:
2. Place of confinement:
(a) Name of institution: BLUE BONNET DETENTION FACILITY
(b) Address: 400 E 2ND STREET, ANSON, TEXAS 79501
(c) Your identification number:
3. Are you currently being held on orders by:
☐ Federal authorities ☐ State authorities ☒ Other - explain:
NO KNOWN ORDERS
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): BEING DETAINED WITH NO VALID REASON. ALIEN ENTERED LAWFULLY INTO THE
UNITED STATES PORT OF ENTRY WAS WASHINGTON DC IN 2014.ON A STUDENT VISA

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: BEING HELD WITH NO PENDING CRIMINAL CHARGES..

(b) Docket number, case number, or opinion number:

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):

(d) Date of the decision or action:

Your Earlier Challenges of the Decision or Action

7. **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: THERE WAS NOTHING TO APPEAL OTHER THAN THE DETENTION

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:

II. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☒ Yes

☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: 08/11/2025

(b) Date of the removal or reinstatement order:

(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: _____

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

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: VIOLATION OF DUE PROCESS FIFTH AMENDMENT TO US CONSTITUTION. NO ONE SHALL BE DEPRIVED OF LIFE LIBERTY OR PROPERTY WITHOUT DUE PROCESS OF LAW I AM BEING DETAINED WITHOUT THE FAIR PROCEDURES BEING INSTITUTED. HE WAS INITIALLY ARRESTED ON AUGUST 9 FOR 15 BOGUS TICKET WARRANTS IN WHICH HE DIDNT EVEN SEE A JUDGE THEY MADE HIM SIGN A

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 Do not cite cases or law.):

TIME SERVED WAIVER THEN ICE WAS CALLED AND HES BEING DETAINED FOR NO VALID REASON.

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

☐ Yes

☐ No

GROUND TWO: HE IS BEING HELD WITHOUT A BOND OR ONE BEING SET. HE WAS ALREADY ON BOND SO HOW DO THEY HAVE HIM DETAINED IF HE HAD A VALID BOND IN PLACE. BOND RECEIPT NUMBER

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

BOND RECEIPT

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

☐ Yes

☐ No

GROUND THREE: EIGHTH AMENDMENT - PROHIBITS GOVERNMENT FROM IMPOSING EXCESSIVE BAIL, EXCESSIVE FINES AND CRUEL AND UNUSUAL PUNISHMENT AND LIMITS THE EXTENT TO WHICH THE GOVERNMENT CAN SEIZE PROPERTY AS A FINE. IF NO CRIME IS HOLDING DETAINEE THEN WHY ARE THEY BEING DETAINED?

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

IF THERE HAS BEEN NO BAIL SET SINCE DETAINED THIS IS UNLAWFUL

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

☐ Yes

☒ No

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GROUND FOUR: FOURTH AMENDMENT-THE RIGHT TO BE SECURE IN THEIR PERSONS HOUSES PAPERS AND EFFECTS, AGAINST UNREASONABLE SEARCHES AND SEIZURES SHALL NOT BE VIOLATED.

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

WAS ARRESTED ON 15 TRAFFIC WARRANTS THAT I KNEW NOTHING ABOUT.. IT WAS LATER VERIFIED WITH ATTORNEY ABE FACTOR THAT THESE WARRANTS WERE NOT IN THE SYSTEM AND THERE WERE NO WARRANTS FOR ARREST PER CHECKING THE COMPUTER SYSTEM. HE WAS NEVER SHOWN ANY PROOF OF WARRANTS UPON ARREST.

(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:

Request for Relief

15. State exactly what you want the court to do:

WE REQUEST JUSTICE RELIEF SOUGHT IS IMMEDIATE RELEASE FROM THE BLUE BONNET DETENTION FACILITY IN ANSON TEXAS JONES COUNTY

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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:

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: 08/26/2025



Signature of Petitioner

AUTHORIZED REPRESENTATIVE

Signature of Attorney or other authorized person, if any

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
LUBBOCK DIVISION

NOEL JUNIOR TCHANGO)

Case No. A 

Petitioner,)

PETITION FOR WRIT OF
HABEAS CORPUS

v.)

MARCELLO VILLEGAS Warden, Blue)
Bonnet Detention Facility under MTC Management)
And Training Corporation)
Joseph B. Edlow, Director, Jerry Scott Ammons,)
Dallas Field Office,)
U.S. Immigration and Customs Enforcement;)
Kristi Noem, Secretary of the U.S. Department of)
Homeland Security; and Pam Bondi)
Attorney General of the United States,)
in their official capacities.)

JURISDICTION

This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.* Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*

This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus)

INTRODUCTION

- I. Jurisdiction and Venue This Court has jurisdiction under 28 U.S.C. § 2241, as Petitioner is in custody within this district under the authority of the United States. Venue is proper in the Northern District of Texas because Petitioner is detained at at Blue Bonnet Detention Facility in Anson, Texas is within this Court's jurisdiction.

PARTIES

II. Petitioner: Noel Junior Tchango

III. Respondents: MARCELLO VILLEGAS Warden, Custodian of Petitioner

At the Blue Bonnet Detention Facility under MTC Management and Training Corporation
Joseph B. Edlow, Director U.S. Immigration and Customs Enforcement.

Jerry Scott Ammons, Dallas Field Office, U.S. Immigration and Customs Enforcement.

Kristi Noem, Secretary of the U.S. Department of Homeland Security

Pam Bondi, Attorney General of the United States, all in their official capacities.

Petitioner

IV. Noel Junior Tchango, Petitioner, an immigrant detainee who is currently held at.
MTC Blue Bonnet Detention Facility, 400 E 2nd St, Anson, TX 79501.

FACTUAL BACKGROUND

V. Noel Junior Tchango a native of Gabon was issued a Student Visa to come to the United States, port of entry was Washington D.C. around December 28, 2014. Both of Noel Tchango's parents are United States Citizens. On August 9th, 2025 At around 12:30. PM. Fort Worth Police Department. Stopped at a private residence, where Noel was sitting on the curb. The officer asked him what he was doing, and he told them that he was waiting on a ride to pick him up.

They advised him that he had fifteen traffic warrants for his arrest, he was taken to Fort Worth City jail.

Noel tried asking about the warrants because he had never been issued a ticket and he had just been released from ice custody and had been detained for seven months at Blue Bonnet detention facility. He was never arraigned at the Fort Worth City Jail; He was made to sign a waiver for time served and never even saw a judge. There was a confidential Ice hold put on him and was later transferred again to the Blue Bonnet detention facility in Anson Texas. Noel Tchango was in custody even though he had an active ice bond of \$6500.00 USD Bond number  issuance date of March 20, 2025.

LEGAL GROUNDS

Severe civil rights violations that have violated several constitutionally protected rights that guarantee the right to due process.

- A. Noel Tchango has not been arraigned, there has been no bond set, there are no pending criminal charges. Detainee is a person of good moral character with strong community ties he is cooperative, not dangerous or a flight risk.
- B. There is no lawful remedy other than judicial action for relief. Petitioners Detention violates his right to substantive and procedural due process that is guaranteed by the 5th amendment of the United States constitution which is the supreme law of the land.

C. Violation of the Fifth Amendment Due Process Clause

Prolonged civil detention without an individualized determination of flight risk or danger is unconstitutional. (Zadvydas v. Davis, 533 U.S. 678 (2001)). B.

5th amendment to the US constitution states that No one shall be deprived of life liberty or property without due process of law.

No Bond Determination

- D. An excessively high or denied bond without sufficient justification violates due process. (Demore v. Kim, 538 U.S. 510 (2003); Jennings v. Rodriguez, 138 S. Ct. 830 (2018))
- E. **Eighth amendment** prohibits government from imposing excessive bail excessive fines and cruel and unusual punishment and limits the extent to which the government can seize property as a fine.

- F. **4th amendment states.** The right of the people to be secure in their persons houses papers and effects against unreasonable searches and seizures shall not be violated and no warrant shall issue but upon probable cause supported by oath or affirmation and particularly describing the place to be searched and the persons or things to be seized.

Deprivation of rights under color of law

- G. **Under USC 241 and 242** conspiracy against rights if two or more persons conspire to injure oppress threaten or intimidate any person in any state territory Commonwealth Possession or district in the free exercise or enjoyment of any right or privilege secured to him by the constitution or laws of the United states or because of his having exercised the same or if two or more persons go in disguise on the highway or on the premise of another with intent to prevent or hinder his free exercise or enjoyment of any right or privilege so secured they shall be fined under the title or imprisoned not more than 10 years or both violations of this section or if such acts include kidnapping or attempt to kidnap they shall be fined under this title or imprisoned for any term of years or for life or both or may be sentenced to death
- H. **USC 18 242** deprivation of rights under color of law whoever under color of any law statute ordinance regulation or custom willfully subjects any person in any state territory Commonwealth possession or district to the deprivation of any rights privileges or immunities secured or protected by the constitution or laws of the United states or to different punishments pains or penalties on account of such person being an alien or by reason of their color or race then are prescribed for the punishment of citizens shall be fined under this title or imprison not more than one year or both and if bodily injury results from the acts committed in violation of this section or of such acts include the use or attempted use or threatened

use of a dangerous weapon explosive or fire or acts committed including kidnapping or attempt to kidnap shall be fined

I. under this title or imprisoned for any term of years or for life or both or may be sentenced to death

Accordingly, to vindicate Petitioner's statutory, constitutional rights, this Court should grant the instant petition for a writ of habeas corpus. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241.

RELIEF REQUESTED

Petitioner respectfully requests that this court immediately.

1) Assume jurisdiction over this matter.

2) Issue a Writ of Habeas Corpus, directing respondents to bring Petitioner before the court...

determine that Petitioner's detention is not justified because the government has not established clear and convincing evidence that Petitioner presents a risk of flight or danger in light of available alternatives to detention, and order Petitioner's release from custody at blue bonnet detention facility.

3.) Order release.

Date: 9/10/2025 VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF PURSUANT TO 28 U.S.C. § 2242 I am submitting this verification on behalf of the Petitioner because I am the Power of attorney for Petitioner. I have discussed with the Petitioner the events described in this Petition. Based on those discussions, I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated 09/10/2025



NOEL JUNIOR TCHANGO

Authorized Representative

Grant such further relief as the Court deems just and proper.

Blue Bonnet Detention Center

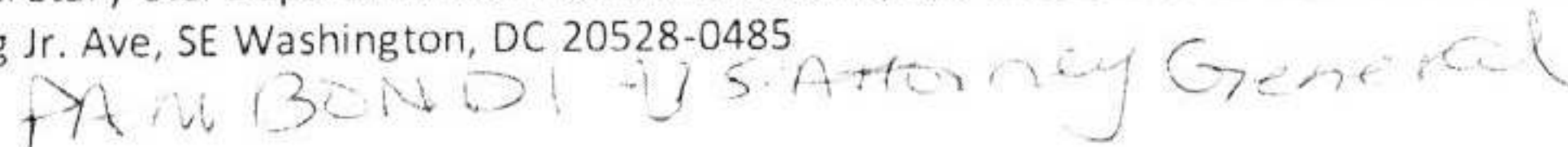
400 E 2nd St., Anson, Texas 79501

CERTIFICATE OF SERVICE I, , hereby certify that on this date 09/10/2025

 filed this Petition for Writ of Habeas Corpus and all attachments using USPS POSTAL SYSTEM. furthermore mailed a copy by USPS Certified Priority Mail with Return Receipts to each of the following individuals: MARCELLO VILLEGAS, Warden BLUE BONNET Detention Facility 400 E 2ND ST. ANSON, TEXAS 79501 22427

JOSEPH B EDLOW , Field Office Director U.S. Immigration and Customs Enforcement, Washington Field Office c/o DHS Office of the General Counsel 2707 Martin Luther King Jr. Ave, SE Washington, DC 20528-0485

KRISTI NOEM Secretary U.S. Department of Homeland Security c/o DHS Office of the General Counsel 2707 Martin Luther King Jr. Ave, SE Washington, DC 20528-0485

 FAW BOND U.S. Attorney General

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS ABILENE
DIVISION

NOEL JUNIOR TCHANGO

Petitioner.

v.

Respondents

MARCELLO VILLEGAS Warden, Blue
Bonnet Detention Facility under MTC Management
And Training Corporation

Joseph B. Edlow, Director, **Jerry Scott Ammons**,
Dallas Field Office,
U.S. Immigration and Customs Enforcement.

Kristi Noem, Secretary of the U.S. Department of
Homeland Security; and **Pam Bondi**
Attorney General of the United States,
in their official capacities.

Case No. 

PROPOSED ORDER GRANTING PETITION FOR WRIT OF HABEAS CORPUS On this day, the Court considered the Petition for Writ of Habeas Corpus filed by Petitioner, Noel Junior Tchango, pursuant to 28 U.S.C. § 2241. Having reviewed the pleadings, the record, and the applicable law, the Court is of the opinion that the Petition should be, and hereby is, GRANTED. IT IS THEREFORE ORDERED that Respondents shall immediately release Petitioner from custody.

SO, ORDERED.

Signed this ____ day of ____, 20__

UNITED STATES DISTRICT JUDGE

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

Noel Junior Tchang

(b) County of Residence of First Listed Plaintiff JONES

(EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number)

N/A

DEFENDANTS

Blue Bennett Detenit
Fac. Justice, DHS, Attorney General

County of Residence of First Listed Defendant JONES

(IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED

Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- ☒ 1 U.S. Government Plaintiff
☐ 2 U.S. Government Defendant
☐ 3 Federal Question (U.S. Government Not a Party)
☐ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- (For Diversity Cases Only)
- | | | | |
|---------------------------------------|----------------------------|----------------------------|---------------------------------------|
| PTF | DEF | PTF | DEF |
| ☒ 1 | ☐ 1 | ☐ 4 | ☒ 4 |
| | | | |
| ☐ 2 | ☐ 2 | ☐ 5 | ☐ 5 |
| | | | |
| ☐ 3 | ☐ 3 | ☐ 6 | ☐ 6 |
| | | | |

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: [Nature of Suit Code Descriptions](#)

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES	
☐ 110 Insurance ☐ 120 Marine ☐ 130 Miller Act ☐ 140 Negotiable Instrument ☐ 150 Recovery of Overpayment & Enforcement of Judgment ☐ 151 Medicare Act ☐ 152 Recovery of Defaulted Student Loans (Excludes Veterans) ☐ 153 Recovery of Overpayment of Veteran's Benefits ☐ 160 Stockholders' Suits ☐ 190 Other Contract ☐ 195 Contract Product Liability ☐ 196 Franchise	PERSONAL INJURY ☐ 310 Airplane ☐ 315 Airplane Product Liability ☐ 320 Assault, Libel & Slander ☐ 330 Federal Employers' Liability ☐ 340 Marine ☐ 345 Marine Product Liability ☐ 350 Motor Vehicle ☐ 355 Motor Vehicle Product Liability ☐ 360 Other Personal Injury ☐ 362 Personal Injury - Medical Malpractice	☐ 365 Personal Injury - Product Liability ☐ 367 Health Care/Pharmaceutical Personal Injury Product Liability ☐ 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY ☐ 370 Other Fraud ☐ 371 Truth in Lending ☐ 380 Other Personal Property Damage ☐ 385 Property Damage Product Liability	☐ 625 Drug Related Seizure of Property 21 USC 881 ☐ 690 Other LABOR ☐ 710 Fair Labor Standards Act ☐ 720 Labor Management Relations ☐ 740 Railway Labor Act ☐ 751 Family and Medical Leave Act ☐ 790 Other Labor Litigation ☐ 791 Employee Retirement Income Security Act IMMIGRATION ☐ 462 Naturalization Application ☐ 465 Other Immigration Actions	☐ 422 Appeal 28 USC 158 ☐ 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS ☐ 820 Copyrights ☐ 830 Patent ☐ 835 Patent - Abbreviated New Drug Application ☐ 840 Trademark ☐ 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY ☐ 861 HIA (1395ff) ☐ 862 Black Lung (923) ☐ 863 DIWC/DIWW (405(g)) ☐ 864 SSID Title XVI ☐ 865 RSI (405(g)) FEDERAL TAX SUITS ☐ 870 Taxes (U.S. Plaintiff or Defendant) ☐ 871 IRS—Third Party 26 USC 7609	☐ 375 False Claims Act ☐ 376 Qui Tam (31 USC 3729(a)) ☐ 400 State Reapportionment ☐ 410 Antitrust ☐ 430 Banks and Banking ☐ 450 Commerce ☐ 460 Deportation ☐ 470 Racketeer Influenced & Corrupt Organizations ☐ 480 Consumer Credit (15 USC 1681 or 1692) ☐ 485 Telephone Consumer Protection Act ☐ 490 Cable Sat TV ☐ 850 Securities Commodity Exchange ☐ 890 Other Statutory Action ☐ 891 Agricultural Acts ☐ 893 Environmental Matters ☐ 895 Freedom of Information Act ☐ 896 Arbitration ☐ 899 Administrative Procedure Act Review or Appeal Agency Decision ☐ 950 Constitutionality of State Statutes
REAL PROPERTY ☐ 210 Land Condemnation ☐ 220 Foreclosure ☐ 230 Rent Lease & Ejectment ☐ 240 Torts to Land ☐ 245 Tort Product Liability ☐ 290 All Other Real Property	CIVIL RIGHTS ☒ 440 Other Civil Rights ☐ 441 Voting ☐ 442 Employment ☐ 443 Housing/Accommodations ☐ 445 Amer. w/Disabilities - Employment ☐ 446 Amer. w/Disabilities - Other ☐ 448 Education	PRISONER PETITIONS Habeas Corpus: ☒ 463 Alien Detainee ☐ 510 Motions to Vacate Sentence ☐ 530 General ☐ 535 Death Penalty Other: ☒ 540 Mandamus & Other ☐ 550 Civil Rights ☒ 555 Prison Condition ☐ 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

- ☒ 1 Original Proceeding
☐ 2 Removed from State Court
☐ 3 Remanded from Appellate Court
☐ 4 Reinstated or Reopened
☐ 5 Transferred from Another District (specify)
☐ 6 Multidistrict Litigation - Transfer
☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity): 28 USC 2241

Brief description of cause: WRIT OF HABEAS CORPUS

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☐ No

VIII. RELATED CASE(S) IF ANY

(See instructions)

JUDGE

DOCKET NUMBER

DATE

9/10/2025

SIGNATURE OF ATTORNEY OF RECORD

Authorized Representative

FOR OFFICE USE ONLY

RECEIPT #

AMOUNT

APPLYING IFP

JUDGE

MAG. JUDGE

US POSTAGE

quodient

FIRST-CLASS MAIL

\$002.44⁹

10/01/2025 ZIP 75501
043M02285481



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OCT -7-2025

MAILROOM

UNITED STATES DISTRICT COURT
OFFICE OF THE CLERK
NORTHERN DISTRICT OF TEXAS
1100 COMMERCE ST ROOM 1452
DALLAS, TX 75242-1310

Noel Junior Tchang
400 E 2nd St
Anson Texas 7501