

Shalai Dmitrii

NAME

A #

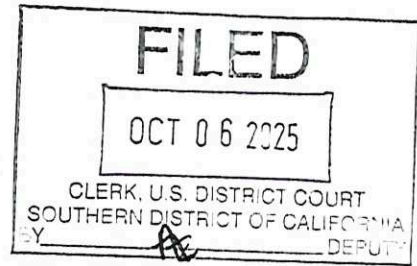
PRISON NUMBER

San Luis Regional Detention Center

PLACE OF CONFINEMENT

P.O. Box 7710 San Luis Az 85349

ADDRESS



United States District Court
Southern District Of California

Shalai Dmitrii

(FULL NAME OF PETITIONER)

Petitioner

U.S. Department of
Homeland Security

(NAME OF WARDEN, SUPERINTENDENT, JAILOR, OR AUTHORIZED
PERSON HAVING CUSTODY OF PETITIONER, E.G. PAROLE OFFICER)

Respondent

and
The Attorney General of the State of
California, Additional Respondent.

Civil No. '25CV2744 BAS KSC

(TO BE FILLED IN BY CLERK OF U.S. DISTRICT COURT)

PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

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

(c) Date of sentencing: _____

☐ Being held on immigration charge

☒ Other (explain): Detained by DHS for immigration violations

2. Are you currently being held on orders by:
☐ Federal authorities ☐ State authorities ☒ Other - explain:
U.S. Department of Homeland Security
3. What are you challenging in this petition:
☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities
☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed
☐ Disciplinary proceedings
☐ Other (specify): _____
4. Provide more information about the decision or action you are challenging:
- (a) Name and location of the court or agency: DHS/ICE San Luis Regional Detention Center P.O. Box 7710 San Luis #285349
- (b) Case number, docket number or opinion number (if you know): A# 
- (c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed): I'm in illegal detain
- (d) Date of the decision or action: 03.11.2025
5. Did you **appeal** the decision, file a grievance or seek an administrative remedy?
☒ Yes ☐ No
- (a) If your answer to 5 was "Yes," give the following information:
- (1) Name of court, agency or authority: 880 Front St 4240 Bldg San Diego CA 92101 Immigration ICE officer
- (2) Date of filing: 07.02.2025
- (3) Case number, docket number or opinion number: —
- (4) Result: I have not received yet
- (5) Date of result: 08.08.2025
- (6) Issues raised: Release my from custody

(b) If your answer to 5 was "No," explain why you did not appeal: _____

6. After the first appeal, did you file a **second appeal** to a higher authority, court or agency?

☒ Yes ☐ No

(a) If your answer to 6 was "Yes," give the following information:

- (1) Name of court, agency or authority: Headquarters Post Order Detention Unit U.S. Department of Homeland Security Immigration and Customs Enforcement
- (2) Date of filing: 09.10.2025
- (3) Case number, docket number or opinion number: _____
- (4) Result: I have not received yet
- (5) Date of result: _____
- (6) Issues raised: Release from custody

(b) If your answer to 5 was "No," explain why you did not appeal: _____

7. After the second appeal, did you file a **third appeal** to a higher authority, agency or court?

☐ Yes ☒ No

(a) If your answer to 7 was "Yes," give the following information:

- (1) Name of court, agency or authority: _____
- (2) Date of filing: _____
- (3) Case number, docket number or opinion number: _____
- (4) Result: _____
- (5) Date of result: _____
- (6) Issues raised: _____

(b) If your answer to 7 was "No," explain why you did not appeal: _____

8. State *concisely* every ground on which you claim that you are being held in violation of the constitution, law or treaties of the United States. Summarize *briefly* the facts supporting each ground. If necessary, you may attach pages stating additional grounds and facts supporting same.

CAUTION: In order to proceed in the federal court, you must ordinarily first exhaust your available court remedies as to each ground on which you request action by the federal court. Moreover, if you fail to set forth all grounds in this petition, you may be barred from presenting additional grounds at a later date.

You should raise in this petition all available grounds on which you base your allegations that you are being held in custody unlawfully.

GROUND ONE: 6 months not deported
Law 8 U.S.C § 1231 (a)(6) 06.28.2001

(a) Supporting FACTS (state briefly without citing cases or law) Six months I wasn't deported. ICE officer 3 times brought to me form for Russian council and filled it. I'm thinking, my government President V.V. Putin or Director FSB Borotnikov just want I still stay in custody in USA and don't approve my new passport. My situation is same like political opposition Aleksey Navalny. Putin also said that several days before his death, he received an offer from someone to exchange Navalny for people who are imprisoned in the West, and immediately agreed. "I agree. Only on one condition - that we exchange him, so that he does not return, let him sit there" - said He News. But I sit in prison now in USA. Every body who help the late kremlin foe Alexei Navalny are convicted and sentenced to prison.

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

☐ Yes ☐ No

GROUND TWO: I'm in real seriously danger if I will deport to Russia

(a) Supporting FACTS (state briefly without citing cases or law): Since inas much as in Russia I was repeatedly to subject physical violence and torture were repeatedly used against me by law enforcement officers and correctional facility staff, I have a psychological illness against the background of emotional-volitional disorders in connection with a forecastically-conditioned speakers. Then, on 03.11.2025 when I asked the judge to deport me to Russia, I did not fully understand the consequences of my return to my homeland. The judge did not take into account the fact that I am facing genuine threats from very serious sources in Russia. Namely President VV Putin, Director FSB Bortnikov and the Chief of the Russian Guard VV Zolotov. This order is confirmed by documents. I'm talks about Lawlessness. I'm in car blocked the road near the Franzensky police. In (11) september 2018 Director of the Russian National Guard V.V. Zolotov reorded a video message to opposition Alexei Navalny, in which he challenged him "to a duel". In 3 October 2018 I'm hellp Alexei Navalny next I'm got a real sentece and saw on the TV news it say I'm "terrorist". In September 1999 V.V. Putin said "We will pursue terrorist everywhere - we will also kill them. I ask you to reverse the court's decision regarding and send my case for a new trial proceedings. And also to release me from custody.

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

☐ Yes ☐ No

GROUND THREE: _____

(a) Supporting FACTS (state briefly without citing cases or law): _____

Please pay attention to the order of your armored
vehicle that is in at the kremlin in the city Moscow
in 3 october 2018 when I demanded a meeting with V.V.
Zolotov I did not threaten anyone except myself
a gas cylindr armored inside the car where I was
no one would have suttered from my actions, no
matter what they were except me.

Thank you.

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

☐ Yes ☐ No

GROUND FOUR: _____

(a) Supporting FACTS (state *briefly* without citing cases or law): _____

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

☐ Yes ☐ No

9. If any of the grounds listed in 4A, B, C, and D were not previously presented in any other court, state or federal, state briefly what grounds were not presented, and give your reasons for not presenting them:

10. Do you have any petition or appeal now pending in any court, either state or federal, as to the execution of sentence under attack?
☐ Yes ☒ No
11. Give the name and address, if known, of each attorney who represented you in the following stages of the execution of sentence attacked herein:
- (a) In any post-conviction proceeding _____
- (b) On appeal from any adverse ruling in a post-conviction proceeding _____

Wherefore, petitioner prays that the Court grant petitioner relief to which he may be entitled in this proceeding.

SIGNATURE OF ATTORNEY (IF ANY)

I declare under penalty of perjury that the foregoing is true and correct. Executed on

10.01.2025

(DATE)

Shalai Dmitrii H #

SIGNATURE OF PETITIONER

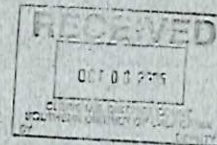
Shalai Dmitrii

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San Luis Regional Detention Center
Po Box 7710 San Luis AZ 85349



FRI 03 OCT 2025
WAZ PDC 850 ZIP



United States District Court
Southern District of California
office of the Clerk
333 West Broadway, Suite 420
San Diego, CA 92101

