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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

GURMAN SINGH, Petitioner

vs

KEVIN RAYCRAFT, in his official capacity as Immigration and Customs Enforcement (ICE),
Acting Director of the Detroit Field Office, Respondent

Case: 2:25-cv-13310
Assigned To : Grey, Jonathan J.C.
Referral Judge: Altman, Kimberly G.
Assign. Date : 10/20/2025
Description: HC SINGH v.
RAYCRAFT (MC)

VERIFIED HABEAS PETITION

Petitioner-plaintiff Gurman Singh ("Petitioner"), *Pro se*, respectfully requests liberal construction and hereby submits his verified Petition for a writ of habeas corpus and seeks declaratory and injunctive relief to review the lawfulness of his detention by the United States Immigration and Customs Enforcement ("ICE"). In support of this Petition and Complaint, Petitioner alleges as follows:

JURISDICTION

1. This action arises under the United States Constitution, the Immigration and Nationality Act of 1952, as amended, 8 U.S.C. § 1101 et seq. (the "INA"), and the Administrative Procedure Act, 5 U.S.C. § 701 et seq. (the "APA").
2. Jurisdiction exists in this Court pursuant to 28 U.S.C. § 2241 et seq., 28 U.S.C. § 1331, the APA, the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1361. This Court has jurisdiction to review Petitioner's unlawful detention claims. See *Ngo v.*

INS, 192 F.3d 390, 393 (3d Cir. 1999).

VENUE

3. Venue is proper in this district because Petitioner is currently incarcerated in the Calhoun County Jail, Battle Creek, MI , within the Eastern District of Michigan, Southern Division. See 28 U.S.C. § 1391(e)(2).

PARTIES

4. Petitioner is a 25 year old citizen and native of India.

5. Respondent-defendant Kevin Raycraft is sued in his official capacity as the District Director for United States Immigration and Customs Enforcement, Detroit Field Office. As such, he is the United States Attorney General's designate, charged with the duty of administration and enforcement of all the functions, powers and duties of ICE. He has responsibilities for detainees confined in the Eastern District of Michigan, which includes the Calhoun County Jail.

FACTS

6. Petitioner first arrived in the United States at or near San Luis, AZ on or about June 6, 2023. He was encountered by Customs and Border Patrol Officers and expressed fear of returning to India and was served with an NTA alleging he was an "alien present in the United States without being admitted or paroled." He was then released and "had an initial hearing scheduled for 5/19/202 at the Chicago [Immigration] Court. This necessarily reflected a finding

of non-dangerousness and not being a risk of flight. He filed a defensive asylum claim on 11/06/2023. He also filed for change of venue from Chicago to Sacramento on 10/27/2023. He was last issued an Employment Authorization card (I-766) on 05/23/2024, which expires on 05/22/2029. He has been living in Roseville City in Sacramento, CA and only recently began working as a Truck Driver with a class A licence. He had only just began finally earning enough to support himself and his family in India. He has never been arrested and has no criminal history. He has not missed any ICE and court dates.

7. On 7/28/2025 Petitioner got lost while driving near the Canadian Border near the Detroit Ambassador Bridge on the United States side. CBP Officers took Petitioner and his co-driver to the Immigration office where they were held without being informed of what was happening until around 8 hours later, after midnight, when they were notified they were being detained for the night pending custody determination. They were informed of arrest the following morning and told they were illegal in the country. Petitioner tried to explain Petitioner had a pending asylum case that was still in the legal process and pending before the Immigration Court and that Petitioner was not an arriving alien.

Petitioner attaches all documents received from ICE as Exhibit 1 consisting several pages.

8. Petitioner was then transferred to the Windsor Tunnel Border Patrol Offices and placed in a small cold cell with no windows and bright lights that were never turned off. It was impossible to tell whether it was day or night. Sleeping was next to the floor with tiny blankets that barely provided any warmth. Nothing to do but stare at the walls. Untold mental torture. Worse than

anything ever experienced in his life. He is currently held at the Calhoun County Jail under equally torturous conditions. Almost always locked down, unsanitary conditions, poor diet, all which cause immense distress to Petitioner.

9. Petitioner appeared before an Immigration Judge ("IJ") for a bond hearing on 9/10/2025, but the court found it did not have jurisdiction to hear Petitioner's bond redetermination because the plain reading of 1225(b)(2)(A) mandated Petitioner's detention, citing the recent BIA opinion in *In the Matter of Yajure Hurtado*, 29 I&N Dec. 216 (2025).

10. Petitioner has his court date currently scheduled more than 3 months out on **January 15, 2026** in the Michigan Immigration Court.

COUNT ONE

Detention in Violation of the Constitution

10. Petitioner repeats and re-alleges the allegations contained in paragraphs 1 through 9 above as though set forth fully herein. Petitioner alleges he is being detained in violation of the Constitution.

The Due Process Clause process clause protects all persons within the United States from being "deprived of life, liberty, or property, without due process of law." US. Const. Amend. V. It is settled that the Due Process clause applies to noncitizens within the United States "whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001); *Trump v. J.G.G.*, 145 S. Ct 1003, 1006 (2025) ("It is well established that the Fifth

Amendment entitles aliens to due process of law in the context of removal proceedings.")

LEGAL STANDARD

Several District Courts across the country, including this one, have recently been dealing with this very issue and consistently granting relief .e.g *Reyes v. Raycraft*, 2025 WL 2609425 (E.D Mich Sept 8, 2025); *Lopez-Campos v. Raycraft*, 2025 WL 2496379 (E.D Mich August 28, 2025); *Kumar v. Wamsley*, 2025 WL 2677089 (W.D Washington September 17, 2025). Petitioner is similarly situated as the Petitioners in *Reyes* and *Lopez-Campos* and meets all the factors considered.

A. Waiver of Administrative Exhaustion is Warranted

This Court has already waived the exhaustion requirements in similar proceedings: i.e. *Lopez-Campos*; *Reyes* finding:

"Waiver is appropriate when the interests of the individual weigh heavily against requiring administrative exhaustion, or exhaustion would be futile and unable to afford the petitioner the relief he seeks...Exhaustion is also excused when delay means hardship...Any delay results in the very harm [Petitioner] is trying to avoid...--detention...Aside from the waiver...a due process challenge generally does not require exhaustion...When the liberty of a person is at stake, every day that passes is a critical one...and the court cannot fault [Petitioner] for taking appropriate measures to pursue his claims through the habeas process with the expectation that his claims would be met with a sense of urgency, and he would receive a decision in a more expedient manner."

Lopez-Campos. (citations and quotes omitted).

B. Due Process

This Court has also already found in *Lopez-Campos* that continued detention under similar circumstances is a "violation of due process" holding that "[f]reedom from imprisonment-from government custody, detention, or other forms of physical restraint--lies at the heart of the very liberty that [the Due Process Clause] protects."

Petitioner also meets the 3 *Matthew* factors outlined in the Court's decision:

1. His liberty is at stake.

2. The risk of continued erroneous deprivation of liberty is not only high but ongoing.

3. The Government "has not and likely cannot show that it has a significant interest in [Petitioner's] continued detention."

PRAYERS FOR RELIEF

In view of above circumstances, Petitioner respectfully requests the same relief requested by other similarly situated Petitioners, and consistently granted by the courts -- Orders requiring the Respondent, his agents and employees to:


1. Immediately release him from custody.
2. Be enjoined and restrained from re-detaining Petitioner without notice and a pre-deprivation hearing before a neutral decisionmaker where the Government bears the burden of proving by clear and convincing evidence that changed circumstances render him a danger to the community or a flight risk, and that no conditions other than his detention would be sufficient to prevent such harms.
3. Return his seized property including Driver's License, Employment Authorization Document and Social Security Card; and
4. Such other relief as may be just and appropriate, including costs, expenses and reasonable attorney fees.

I affirm, under penalty of perjury, that the foregoing is true and correct.

Gurman Singh

Petitioner

October 13, 2025

Gurman Singh A. 
Calhoun County Jail
185 E Michigan Ave
Battle Creek, MI 49014

Certificate of Service

Petitioner hereby certifies that on this 13 Day of October, 2025 he submitted to the Detention Center Officers a true copy of this **VERIFIED PETITION FOR ~~EX PARTE EMERGENCY WRIT OF HABEAS CORPUS, TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION~~** for mailing via USPS in a postage pre-paid envelope addressed to the:

United States District Court
Eastern District of Michigan,
231 West Lafayette Blvd Room 599
Detroit MI 48226

for electronic filing which will automatically notify all parties of record;

and another true copy in a postage-prepaid envelope addressed to:

Kevin Raycraft
ICE Detroit Field Office
985 Michigan Ave Suite 207
Detroit MI 48226



Respectfully Submitted

Gurman Singh

Gurman Singh A. 
Calhoun County Jail
185 E Michigan Ave
Battle Creek, MI 49014

U.S. DEPARTMENT OF HOMELAND SECURITY Warrant for Arrest of Alien

SIGMA E: 
FINS #: 

File No. 
Event No: 
Date: 07/28/2025 22:49

To: Any immigration officer authorized pursuant to sections 236 and 287 of the Immigration and Nationality Act and part 287 of title 8, Code of Federal Regulations, to serve warrants of arrest for immigration violations

I have determined that there is probable cause to believe that SINGH, GURMAN is removable from the United States. This determination is based upon:

- the execution of a charging document to initiate removal proceedings against the subject;
- the pendency of ongoing removal proceedings against the subject;
- the failure to establish admissibility subsequent to deferred inspection;
- biometric confirmation of the subject's identity and a records check of federal databases that affirmatively indicate, by themselves or in addition to other reliable information, that the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law; and/or
- statements made voluntarily by the subject to an immigration officer and/or other reliable evidence that affirmatively indicate the subject either lacks immigration status or notwithstanding such status is removable under U.S. immigration law.

YOU ARE COMMANDED to arrest and take into custody for removal proceedings under the Immigration and Nationality Act, the above-named alien.


Digitally Acquired Signature
(Signature of Authorized Immigration Officer)

DROLET, Richard G - WATCH COMMANDER
(Printed Name and Title of Authorized Immigration Officer)

Certificate of Service

I hereby certify that the Warrant for Arrest of Alien was served by me at Detroit, Michigan (Location)

On SINGH, GURMAN (Name of Alien) on July 28, 2025 (Date of Service), and the contents of this

notice were read to him or her in the ENGLISH (Language) language.


Digitally Acquired Signature

RUSS, CAR23645 - CBP OFFICER

Name and Signature of Officer

Name or Number of Interpreter (if applicable)

DEPARTMENT OF HOMELAND SECURITY
NOTICE OF CUSTODY DETERMINATION

Alien's Name: SINGH, GURMAN

A-File Number: [REDACTED]

SIGMA Event: [REDACTED]
Event ID: [REDACTED]

Date: 07/28/2025

Subject ID: [REDACTED]

Pursuant to the authority contained in section 236 of the Immigration and Nationality Act and part 236 of title 8, Code of Federal Regulations, I have determined that, pending a final administrative determination in your case, you will be:

- Detained by the Department of Homeland Security.
- Released (check all that apply):
 - Under bond in the amount of \$ _____
 - On your own recognizance.
 - Under other conditions. [Additional document(s) will be provided.]

DROLET, Richard G *Richard Droles* 07/28/2025 22:53
 Name and Signature of Authorized Officer Date and Time of Custody Determination
Digitally Acquired Signature
WATCH COMMANDER Detroit (DET)
 Title Office Location/Address

You may request a review of this custody determination by an immigration judge.

- I acknowledge receipt of this notification, and
- I do request an immigration judge review of this custody determination.
- I do not request an immigration judge review of this custody determination.

Gurman Singh 07/28/2025
 Signature of Alien Date
Digitally Acquired Signature

The contents of this notice were read to SINGH, GURMAN in the ENGLISH language.
(Name of Alien) (Name of Language)

RUSS, CAR23645 [Signature]
 Name and Signature of Officer Name or Number of Interpreter (if applicable)
Digitally Acquired Signature
CBP OFFICER
 Title

DEPARTMENT OF HOMELAND SECURITY
NOTICE TO APPEAR

In removal proceedings under section 240 of the Immigration and Nationality Act:

Subject ID: [REDACTED] FINS [REDACTED] File No: [REDACTED]
DOB: [REDACTED] Event No: [REDACTED]

In the Matter of: GURMAN SINGH
Respondent: [REDACTED] currently residing at:

[REDACTED ADDRESS] (Number, street, city, state and ZIP code) (Area code and phone number)

- You are an arriving alien.
- You are an alien present in the United States who has not been admitted or paroled.
- You have been admitted to the United States, but are removable for the reasons stated below.

The Department of Homeland Security alleges that you:

1. You are not a citizen or national of the United States;
2. You are a native of INDIA and a citizen of INDIA ;
3. You arrived in the United States at or near SAN LUIS, AZ , on or about June 6, 2023 ;
4. You were not then admitted or paroled after inspection by an Immigration Officer.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended, in that you are an alien present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General.

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- Section 235(b)(1) order was vacated pursuant to: 8CFR 208.30 8CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at:

55 E. Monroe, Suite 1500 Chicago, IL 60603
(Complete Address of Immigration Court, including Room Number, if any)

on May 19, 2025 at 09:00 AM to show why you should not be removed from the United States based on the

charge(s) set forth above. JORGE GONZALEZ Acting/Patrol Agent in Charge JORGE A GONZALEZ
(Signature and Title of Issuing Officer) (Sign in ink) Date: 2023.06.06 12:07:00 0607524370.CBP

Date: June 06, 2023 Yuma, Arizona
(City and State)

EOIR - 1 of 3

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Notice to Respondent

Warning: Any statement you make may be used against you in removal proceedings.

Alien Registration: This copy of the Notice to Appear served upon you is evidence of your alien registration while you are in removal proceedings. You are required to carry it with you at all times.

Representation: If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 1003.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice, to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this notice.

Conduct of the hearing: At the time of your hearing, you should bring with you any affidavits or other documents that you desire to have considered in connection with your case. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing. At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear, including that you are inadmissible or removable. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the Immigration Judge. You will be advised by the Immigration Judge before whom you appear of any relief from removal for which you may appear eligible including the privilege of voluntary departure. You will be given a reasonable opportunity to make any such application to the immigration judge.

One-Year Asylum Application Deadline: If you believe you may be eligible for asylum, you must file a Form I-589, Application for Asylum and for Withholding of Removal. The Form I-589, Instructions, and information on where to file the Form can be found at www.uscis.gov/i-589. Failure to file the Form I-589 within one year of arrival may bar you from eligibility to apply for asylum pursuant to section 208(a)(2)(B) of the Immigration and Nationality Act.

Failure to appear: You are required to provide the Department of Homeland Security (DHS), in writing, with your full mailing address and telephone number. You must notify the Immigration Court and the DHS immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the DHS.

Mandatory Duty to Surrender for Removal: If you become subject to a final order of removal, you must surrender for removal to your local DHS office, listed on the internet at <http://www.ice.gov/contact/ero>, as directed by the DHS and required by statute and regulation. Immigration regulations at 8 CFR 1241.1 define when the removal order becomes administratively final. If you are granted voluntary departure and fail to depart the United States as required, fail to post a bond in connection with voluntary departure, or fail to comply with any other condition or term in connection with voluntary departure, you must surrender for removal on the next business day thereafter. If you do not surrender for removal as required, you will be ineligible for all forms of discretionary relief for as long as you remain in the United States and for ten years after your departure or removal. This means you will be ineligible for asylum, cancellation of removal, voluntary departure, adjustment of status, change of nonimmigrant status, registry, and related waivers for this period. If you do not surrender for removal as required, you may also be criminally prosecuted under section 243 of the Immigration and Nationality Act.

U.S. Citizenship Claims: If you believe you are a United States citizen, please advise the DHS by calling the ICE Law Enforcement Support Center toll free at (855) 448-6903.

Sensitive locations: To the extent that an enforcement action leading to a removal proceeding was taken against Respondent at a location described in 8 U.S.C. § 1229(e)(1), such action complied with 8 U.S.C. § 1367.

Request for Prompt Hearing

To expedite a determination in my case, I request this Notice to Appear be filed with the Executive Office for Immigration Review as soon as possible. I waive my right to a 10-day period prior to appearing before an immigration judge and request my hearing be scheduled.

Before:

(Signature of Respondent) (Sign in ink)

Border Patrol Agent

Date: 06/06/2023

(Signature and Title of Immigration Officer) (Sign in ink)

Certificate of Service

This Notice To Appear was served on the respondent by me on June 06, 2023, in the following manner and in compliance with section 239(a)(1) of the Act.

- in person by certified mail, returned receipt # _____ requested by regular mail
- Attached is a credible fear worksheet.
- Attached is a list of organization and attorneys which provide free legal services.

The alien was provided oral notice in the PUNJABI language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

(Signature of Respondent if Personally Served) (Sign in ink)

KENDRA L. MARQUEZ, Border: _____
Date: 2023 06 06 13:07:00
014231861
(Signature and Title of officer) (Sign in ink)

EOIR - 2 of 3

Final file 10/20/25 4:17

Privacy Act Statement

Authority:

The Department of Homeland Security through U.S. Immigration and Customs Enforcement (ICE), U.S Customs and Border Protection (CBP), and U.S. Citizenship and Immigration Services (USCIS) are authorized to collect the information requested on this form pursuant to Sections 103, 237, 239, 240, and 290 of the Immigration and Nationality Act (INA), as amended (8 U.S.C. 1103, 1229, 1229a, and 1360), and the regulations issued pursuant thereto.

Purpose:

You are being asked to sign and date this Notice to Appear (NTA) as an acknowledgement of personal receipt of this notice. This notice, when filed with the U.S. Department of Justice's (DOJ) Executive Office for Immigration Review (EOIR), initiates removal proceedings. The NTA contains information regarding the nature of the proceedings against you, the legal authority under which proceedings are conducted, the acts or conduct alleged against you to be in violation of law, the charges against you, and the statutory provisions alleged to have been violated. The NTA also includes information about the conduct of the removal hearing, your right to representation at no expense to the government, the requirement to inform EOIR of any change in address, the consequences for failing to appear, and that generally, if you wish to apply for asylum, you must do so within one year of your arrival in the United States. If you choose to sign and date the NTA, that information will be used to confirm that you received it, and for recordkeeping.

Routine Uses:

For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the following DHS systems of records notices (SORN): DHS/USCIS/ICE/CBP-001 Alien File, Index, and National File Tracking System of Records, DHS/USCIS-007 Benefit Information System, DHS/ICE-011 Criminal Arrest Records and Immigration Enforcement Records (CARIER), and DHS/ICE-003 General Counsel Electronic Management System (GEMS), and DHS/CBP-023 Border Patrol Enforcement Records (BPER). These SORNs can be viewed at <https://www.dhs.gov/system-records-notices-sorn>. When disclosed to the DOJ's EOIR for Immigration proceedings, this information that is maintained and used by DOJ is covered by the following DOJ SORN: EOIR-001, Records and Management Information System, or any updated or successor SORN, which can be viewed at <https://www.justice.gov/opcl/doj-systems-records>. Further, your information may be disclosed pursuant to routine uses described in the abovementioned DHS SORNs or DOJ EOIR SORN to federal, state, local, tribal, territorial, and foreign law enforcement agencies for enforcement, investigatory, litigation, or other similar purposes.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within DHS, as well as with federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for enforcement, investigatory, litigation, or other similar purposes.

Disclosure:

Providing your signature and the date of your signature is voluntary. There are no effects on you for not providing your signature and date; however, removal proceedings may continue notwithstanding the failure or refusal to provide this information.

EOIR - 3 of 3

Exhibit 1 page 5 of 13

U.S. Department of Homeland Security

Continuation Page for Form 1213

Alien's Name SINGH, GURMAN	File Number SIGMA Event No: [REDACTED]	Date July 31, 2025
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CLAIMED DOCUMENTS

Employee Authorization Doc - [REDACTED]

RECORDS CHECKED

- NCIC Neg
- CIS Pos
- CLAIM Pos
- CCD Neg
- IAFIS Pos
- EARM Pos

SECTION CODES

Sec212(a)(6)(A)(i)
8 USC 1182-ALIEN INADMISSIBILITY UNDER SEC 212(a)

At/Near

DETROIT FORT STREET, MI

Narrative:

On 07/28/2025 SINGH, Gurman (DOB: [REDACTED] (COB/COB: India) and SINGH, Jobanpreet (DOB: [REDACTED] (COC/COB: India) were encountered by DCET officers at the outbound lanes of the Detroit Ambassador Bridge POE while in California plated vehicle (YP61284). The travelers stated that they were lost and did not intend to depart to Canada. The travelers were escorted to the Fort Street Cargo facility and escorted to the secondary inspection area. Both aliens are non-arriving and not applicants for admission.

In secondary, CBPO Russ asked SINGH, Gurman where he was going and he claimed that he picked up a load in Arkansas and was going to deliver it to Warren, Michigan but got lost. When asked if he had a passport, SINGH, Gurman provided an Employment Authorization card (I-766) and a driver's license from California.

A pat down for detention and officer safety was conducted at 20:28 by CBPO Dockweiler, witnessed by CBPO Williams, approved by SCBPO Brandt, and resulted in negative findings at 20:31.

A 10-print search was conducted and SINGH, Gurman matched to FIN: [REDACTED] and [REDACTED] and FBI [REDACTED] which is for a Notice to Appear that was served by Border Patrol in San Luis, Arizona on 06/06/2023 and pursuant to Section 212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended.

System checks show that he had an initial hearing with the Chicago court on 05/19/2025. He filed a defensive asylum claim on 11/06/2023. He also filed for a change of venue from Chicago to Sacramento on 10/27/2023. EOIR shows his case is pending and has been moved to Sacramento, CA, but due to the defensive asylum filing he currently does not have a future court date.

... (CONTINUED ON NEXT PAGE)

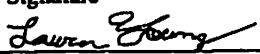
Signature <i>Lauren Young</i> YOUNG, Lauren A	Title CBP OFFICER
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Digitally Acquired Signature

Exhibit 1 page 6 of 13 DHS 2

U.S. Department of Homeland Security

Continuation Page for Form 1213

Alien's Name SINGH, GURMAN	File Number SIGMA Eve Event No:	Date July 31, 2025
<p>He was last issued an Employment Authorization card (I-766) on 05/23/2024, which expires on 05/22/2029. He claims to live in Roseville, California, is unmarried, has no children, and is a truck driver for Cheema Trans Express. He stated to have no medical problems, take no prescribed medication. SINGH stated that he has a fear of returning to India. No criminal history found.</p> <p>TIRT conducted an interview and submitted an event to NTC for vetting. NTC event returned the following results: TIDE: Negative/CABLES: Inconclusive to common/partial name.</p> <p>Port management was given the details of the case. Per the Assistant Port Director (APD), OFO is seeking detention of SINGH with ICE ERO in Detroit, Michigan.</p> <p>SINGH was served with I-200, I-286, free legal services, EOIR 33 change of address form and FTO notification. SINGH was advised of his consular right and chose to have his consulate notified of his detention.</p> <p>Detention was submitted in CAS on 07/29/2025 at approximately 0758 hours.</p> <p>ICE ERO accepted placement of SINGH, Gurman at Calhoun County Corrections in Battle Creek, MI on 07/31/2025. CBP OFO Detroit transported SINGH, Gurman later in the day on 07/31/2025 to Calhoun County Corrections in Battle Creek, MI.</p>		
Signature  YOUNG, Lauren A	Title CBP OFFICER	

Digitally Acquired Signature

3 of 3 Pages

Exhibit 1 page 7 of 13 ^{DHS 3}

POOR QUALITY ORIGINAL

U.S. Department of Homeland Security

Record of Deportable/Inadmissible Alien




Family Name (CAPS) SINGH, GURMAN		First	Middle	Sex M	Hair BLK	Eyes BRO	Complexion MBR
Country of Citizenship INDIA	Passport Number and Country of Issue			Height 70	Weight 176	Occupation OTH	
U.S. Address				Scars and Marks NONE INDICATED			
Date, Place, Time, and Manner of Last Entry Unknown Date, Unknown Time			Passenger Bonded as	F.B.I. Number		<input type="checkbox"/> Single <input type="checkbox"/> Divorced <input type="checkbox"/> Married <input type="checkbox"/> Widower <input type="checkbox"/> Separated	
Number, Street, City, Province (State) and Country of Permanent Residence				Method of Location/Apprehension ISE			
Date of Birth	Age: 25	Date of Action 07/29/2025	Location Code 3801-FSC - DET	AV/Non See I-831	Date/Time 07/28/2025 2141		
City, Province (State) and Country of Birth INDIA		AR <input checked="" type="checkbox"/>	Form: (Type and No.) Lifted <input type="checkbox"/> Not Lifted <input checked="" type="checkbox"/> See Narrative	By RUSS, CAR23545			
NTV Issuing Post and NTV Number None		Social Security Account Name None		Status as Entry See Narrative		Status When Found TRAVEL/SEEKING	
Date Visa Issued None		Social Security Number None		Length of Time Legally in U.S. Over 1 year			
Immigration Record POSITIVE - See Narrative			Criminal Record None Known				
Name, Address, and Nationality of Spouse (Maiden Name, if Appropriate) NONE						Number and Nationality of Minor Children 0	
Father's Name, Nationality, and Address, if Known SINGH, BALVINDER NATIONALITY: INDIA			Mother's Present and Maiden Name, Nationality, and Address, if Known KADR, Ranjit NATIONALITY: INDIA				
Moses Due/Property to U.S. Not in Immediate Possession See Narrative		Fingerprinted? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	System Checks See Narrative	Charge Code Word(s) See Narrative			
Name and Address of (Last) Current U.S. Employer Cheema Trans Express		Type of Employment OTH	Salary 0.0 USD	Employed from/to Hr 0/0/00 - 0/0/00			
Narrative (Outline particulars under which alien was located/apprehended. Include details not shown above regarding time, place and manner of last entry, attempted entry, or any other entry, and attempts which establish administrative and/or criminal violation. Indicate means and route of travel to interior.) Left Index Finger Right Index Finger							
							
<p>STATUS AT ENTRY</p> <p>Present Without Admission or Parole</p> <p>AR Document</p> <p>Employee Authorization Doc - </p> <p>... (CONTINUED ON I-831)</p>							
Digitally Acquired Signature LY YOUNG, Lauren A CBP OFFICER (Date/Initials)				Digitally Acquired Signature Lauren Young (Signature and Title of Immigration Officer)			
Alien has been advised of communication privileges 07/29/2025							
Distribution: A-file				Received: (Subject and Documents) (Report of Interview) YOUNG, Lauren A - CBP OFFICER Officer:  on: July 29, 2025 (Date) Digitally Acquired Signature Disposition: IR REMOVAL PROCEEDINGS (NO FINAL ORDER) Examining Officer: COLLINS, Ryan T - SUPERVISORY CBP OFFICER Digitally Acquired Signature			

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FINS: [REDACTED]

Event No: [REDACTED]



DEPARTMENT OF HOMELAND SECURITY
U.S. Customs and Border Protection

WITHDRAWAL OF APPLICATION FOR ADMISSION/CONSULAR NOTIFICATION

Basis for Action (Check all that apply):

SIGMA Event: [REDACTED]

File No: [REDACTED]

Date: 07/28/2025

- Application for Admission Withdrawn
- Visa/BCC Canceled
- VWP Refusal
- Ordered removed (inadmissible) by immigration judge - Section 235(b)(2) (order attached)
- Ordered removed (inadmissible) by DHS - Section 235(b)(1) (order attached)
- Waiver revoked (212(d)(3)) (order attached)
- Departure required (8 CFR 240.25) (Form I-213 attached)

POOR QUALITY ORIGINAL

Notice to: American Consul New Delhi, India

From: DHS DETROIT FORT STREET, MI

(Location)


(Location)

Name (Family, Given, Middle): SINGH, GURMAN		
Citizenship: INDIA	Country of Birth: INDIA	Date of Birth: [REDACTED]
Complete Foreign Mailing Address (Street Address, City, Country): 		
Complete U.S. Address (Street Address, City, State, Zip): [REDACTED]		
Airline/Vessel of Arrival:	Port of Arrival: DETROIT FORT STREET, MI	Date of Arrival: 07/28/2025
Visa Number/Type: None	Date/Place of Visa Issuance: None	Social Security Number: None
Reasons (Include all pertinent facts concerning denial of application for admission, including use of altered, counterfeit or fraudulent document): In 240 removal proceedings		
<div style="display: flex; justify-content: space-around; align-items: center;"> <div style="width: 150px; height: 100px; background-color: black; position: relative; margin-bottom: 10px;"> </div> <div style="width: 150px; height: 100px; background-color: black; position: relative; margin-bottom: 10px;"> </div> </div> <p>On 07/28/2025 SINGH, Gurman (DOB: [REDACTED] (COB/COB: India) and SINGH, Jobanpreet (DOB: [REDACTED] (COB/COB: India) were encountered by DCET officers at the outbound lanes of the Detroit Ambassador Bridge POE while in California plated vehicle [REDACTED]. The travelers stated that they were lost and did not intend to depart to Canada. The travelers were escorted to the Fort Street Cargo facility and escorted to the secondary inspection area. Both aliens are non-arriving and not applicants for admission.</p> <p>In secondary, CBPO Russ asked SINGH, Gurman where he was going and he claimed that he picked up a load in Arkansas and was going to deliver it to Warren, Michigan but got ... (CONTINUED ON I-831)</p>		
(Continue on reverse or attach separate sheet, as needed)		
Officer's Name and Title: YOUNG, Lauren A Last Name First Name M.I. CBP OFFICER	Officer's Signature: <i>Lauren Young</i> Digitally Acquired Signature	
Supervisor's Name and Title: COLLINS, Ryan T Last Name First Name M.I. SUPERVISORY CBP OFFICER	Supervisor's Signature: <i>RCollins</i> Digitally Acquired Signature	

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U.S. Department of Homeland Security

Continuation Page for Form 1275

Alien's Name SINGH, GURMAN	File Number SIGMA Eve Event No: 	Date July 31, 2025
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lost. When asked if he had a passport, SINGH, Gurman provided an Employment Authorization card (I-766) and a driver's license from California.

A pat down for detention and officer safety was conducted at 20:28 by CBPO Dockweiler, witnessed by CBPO Williams, approved by SCBPO Brandt, and resulted in negative findings at 20:31.

A 10-print search was conducted and SINGH, Gurman matched to FIN:  and  and FBI #  which is for a Notice to Appear that was served by Border Patrol in San Luis, Arizona on 06/06/2023 and pursuant to Section 212(a)(6)(A)(i) of the Immigration and Nationality Act, as amended.

System checks show that he had an initial hearing with the Chicago court on 05/19/2025. He filed a defensive asylum claim on 11/06/2023. He also filed for a change of venue from Chicago to Sacramento on 10/27/2023. EOIR shows his case is pending and has been moved to Sacramento, CA, but due to the defensive asylum filing he currently does not have a future court date.

He was last issued an Employment Authorization card (I-766) on 05/23/2024, which expires on 05/22/2029. He claims to live in Roseville, California, is unmarried, has no children, and is a truck driver for Cheema Trans Express. He stated to have no medical problems, take no prescribed medication. SINGH stated that he has a fear of returning to India. No criminal history found.


TTRT conducted an interview and submitted an event to NTC for vetting. NTC event returned the following results: TIDE: Negative/CABLES: Inconclusive to common/partial name.

Port management was given the details of the case. Per the Assistant Port Director (APD), OFO is seeking detention of SINGH with ICE ERO in Detroit, Michigan.

SINGH was served with I-200, I-286, free legal services, EOIR 33 change of address form and FTO notification. SINGH was advised of his consular right and chose to have his consulate notified of his detention.

Detention was submitted in CAS on 07/29/2025 at approximately 0758 hours.

ICE ERO accepted placement of SINGH, Gurman at Calhoun County Corrections in Battle Creek, MI on 07/31/2025. CBP OFO Detroit transported SINGH, Gurman later in the day on 07/31/2025 to Calhoun County Corrections in Battle Creek, MI.

Signature  YOUNG, Lauren A	Title CBP OFFICER
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Digitally Acquired Signature

3 of 3 Pages

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TO BE COMPLETED BY ALIEN WHEN APPLICATION FOR ADMISSION IS WITHDRAWN.

I understand that my admissibility is questioned for the above reasons, which I have read or which have been read to me in the _____ language. I request that I be permitted to withdraw my application for admission and return abroad. I understand that my voluntary withdrawal of my application for admission is in lieu of a formal determination concerning my admissibility:

- by a CBP Officer
- in removal proceedings before an immigration judge.

Date

Signature of Alien

INSTRUCTIONS

Aliens who appear inadmissible pursuant to section 235(b)(2) of the INA who elect to withdraw application for admission may choose at any time to appear before an immigration judge for a hearing in removal proceedings. Aliens who appear inadmissible pursuant to section 235(b)(1) or inadmissible pursuant to 8 CFR 217.4 are not entitled to a hearing before an immigration judge.

If a visa is canceled pursuant to 22 CFR 41.122 or a Border Crossing Card is voided under authority of 22 CFR 41.32 or 8 CFR 212.6, forward a copy of CBP Form I-275 to consular post that issued the canceled or voided document.

When forwarding to consular post, attach:

- Any lifted document
- Relating Form I-213 or I-862 (Notice to Appear)
- Relating removal or waiver revocation order
- Any relating memorandum report or sworn statement

CERTIFICATE OF SERVICE

On September 8, 2025, the undersigned served a copy of this Form I-864 to the respondent via email to the assigned deportation officer at the detention facility where the respondent is housed.



Wenhao Zhou
Assistant Chief Counsel
985 Michigan Ave, Suite 1010
Detroit, MI 48226
(313) 771-6500

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10/13/2025

Dear Clerk,

Money order for \$5 already sent on
9/27/25 tracking number [REDACTED]

Serial number [REDACTED] or

[REDACTED]

Please file Habeas Petition as docket 1, then
TRO as docket 2.

Thanks

Sincerely,

Gurman Singh