UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF LOUISIANA
BATON ROUGE DIVISION

RAYMOND LOUIS,
Petitioner,

Civil Action No. _____

v.

WARDEN, LOUISIANA STATE PENITENTIARY (ANGOLA); FIELD OFFICE DIRECTOR, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE) NEW ORLEANS FIELD OFFICE; SECRETARY, U.S. DEPARTMENT OF HOMELAND SECURITY; and ATTORNEY GENERAL OF THE UNITED STATES,
Respondents.

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

I. JURISDICTION AND VENUE

1. This Petition is brought pursuant to 28 U.S.C. § 2241 to challenge the unlawful and unconstitutional detention of Petitioner Raymond Louis, an immigration detainee currently held at the Louisiana State Penitentiary (Angola) in West Feliciana Parish, Louisiana.

2. This Court has jurisdiction under 28 U.S.C. § 2241(a) (habeas corpus in district of confinement) and 28 U.S.C. § 1331 (federal question jurisdiction). Venue is proper in this District pursuant to 28 U.S.C. § 2241(d) because Petitioner is in custody within the Middle District of Louisiana, and the Warden of Angola exercises immediate physical custody over him. See Rumsfeld v. Padilla, 542 U.S. 426, 434–35 (2004) (immediate custodian rule).

II. PARTIES

3. Petitioner Raymond Louis is a national of Haiti with prior lawful residence in the Bahamas. He has been detained by U.S. Immigration and Customs Enforcement (ICE) at the Louisiana State Penitentiary ("Angola") since approximately June 10, 2025, following a period of full compliance with ICE supervision in the community.

4. Respondent Warden, Louisiana State Penitentiary (Angola), exercises immediate physical custody over Petitioner at Angola, located at 17544 Tunica Trace, Angola, LA 70712.

5. Respondent Field Office Director, U.S. Immigration and Customs Enforcement (ICE) New Orleans Field Office, exercises legal custody over Petitioner and oversees his immigration detention from 1250 Poydras Street, Suite 300, New Orleans, LA 70113.

6. Respondent Secretary, U.S. Department of Homeland Security, is responsible for the supervision and execution of Petitioner's removal and detention under 8 U.S.C. § 1231, with offices at 245 Murray Lane SW, Washington, DC 20528.

7. Respondent Attorney General of the United States is responsible for the execution of the immigration laws under 8 U.S.C. § 1103, with offices at 950 Pennsylvania Avenue NW, Washington, DC 20530.

III. FACTUAL BACKGROUND

8. Petitioner entered the United States as a lawful permanent resident but became subject to a final order of removal issued in 1993 following a criminal conviction. For over three decades since that order, ICE has been unable to effectuate his removal. Upon release from criminal custody, he was placed on ICE supervision in the community, where he resided and fully complied with all reporting requirements, including check-ins and employment verification, for over 18 months prior to June 2025.

9. Despite this long history of non-removal, his full compliance, and the absence of any new criminal conduct or flight risk, ICE revoked Petitioner's supervision and re-detained him on or about June 10, 2025, solely for purposes of removal under 8 U.S.C. § 1231(a)(6).

10. ICE has repeatedly sought travel documents from both the Government of the Bahamas (where Petitioner last resided) and the Government of Haiti (Petitioner's country of nationality). As of October 7, 2025, both governments have formally declined to issue such documents. The Bahamas has cited insufficient evidence of nationality and ongoing humanitarian repatriation restrictions, while Haiti has invoked its general moratorium on deportations due to political instability and humanitarian crises.

11. ICE has provided no evidence of alternative receiving countries or any concrete plan for removal—despite more than 32 years under the 1993 removal order. As a result, Petitioner's removal is not reasonably foreseeable within the meaning of Zadvydas v. Davis, 533 U.S. 678, 701 (2001).

12. Petitioner has now been detained for over four months—exceeding the presumptively reasonable six-month period under Zadvydas—without a bond hearing, any review before a neutral decision-maker, or any individualized explanation as to how or when removal might occur. During this time, he has remained in full compliance with facility rules and poses no danger to the community.

IV. LEGAL FRAMEWORK

13. The Immigration and Nationality Act authorizes post-removal-order detention under 8 U.S.C. § 1231(a)(6), but such detention is subject to strict constitutional and statutory limits. In Zadvydas v. Davis, 533 U.S. 678, 701 (2001), the Supreme Court held that detention beyond a presumptively reasonable six-month period is permissible only if the government shows a "significant likelihood of removal in the reasonably foreseeable future." Absent such a showing, continued detention violates the Fifth Amendment's Due Process Clause.

14. This rule applies with equal force to all aliens subject to § 1231(a)(6), regardless of criminal history. Clark v. Martinez, 543 U.S. 371, 378 (2005) (extending Zadvydas to non-criminal aliens).

15. Moreover, prolonged immigration detention without procedural safeguards—such as an individualized bond hearing before an immigration judge or neutral arbiter—violates due process. See Guerrero-Sanchez v. Warden York Cnty. Prison, 905 F.3d 208, 224–25 (3d Cir. 2018) (requiring periodic

bond hearings after six months); cf. Jennings v. Rodriguez, 583 U.S. 281, 305–06 (2018) (not addressing constitutional floor for prolonged detention).

V. CLAIMS FOR RELIEF

Claim 1 — Unconstitutional Prolonged Detention (Due Process; 8 U.S.C. § 1231(a)(6))

16. ICE's continued detention of Petitioner exceeds the permissible period under Zadvydas and Clark v. Martinez, violating the Due Process Clause of the Fifth Amendment.

17. Because both the Bahamas and Haiti have denied travel documents and ICE has identified no viable alternatives—after more than 32 years under the 1993 removal order—there is no significant likelihood of removal in the reasonably foreseeable future. See Zadvydas, 533 U.S. at 701 (foreseeability assessed based on concrete evidence, not speculation).

18. Petitioner's detention has thus lost any statutory or constitutional justification and now serves only punitive ends, which is expressly forbidden. Id. at 690–91. Immediate release under supervision is required.

Claim 2 — Lack of Procedural Due Process

19. Petitioner has been denied any meaningful opportunity for an individualized custody determination or bond hearing before a neutral decision-maker, in violation of the Fifth Amendment. Demore v. Kim, 538 U.S. 510, 531 (2003) (Rodriguez, J., concurring) (due process requires "meaningful process" for prolonged detention).

20. ICE's internal file reviews under 8 C.F.R. § 241.4 are inadequate substitutes, as they lack neutrality, adversarial testing, and judicial oversight. Guerrero-Sanchez, 905 F.3d at 225 (rejecting agency reviews as sufficient).

Claim 3 — Unlawful Conditions of Confinement

21. Petitioner is confined at Angola, a maximum-security state prison designed for violent offenders, not civil immigration detainees. This placement exposes him to unconstitutional conditions, including rampant violence, inadequate medical care, infestations of flies and other pests, mold and mildew in showers, leaking sewage, and other environmental hazards.

22. Federal courts in this District and Circuit have repeatedly condemned Angola's conditions as violative of the Eighth Amendment (as applied via the Fourteenth) and Due Process Clause. See, e.g., Smith v. Edwards, No. 3:23-cv-00992-BAJ-EWD, 2023 WL 4767637, at *1 (M.D. La. July 26, 2023) (granting preliminary injunction against housing juveniles at Angola due to "egregious" conditions, including sexual assault risks and understaffing); Lewis v. Cain, 444 F. Supp. 3d 823, 835–42 (M.D. La. 2020) (certifying class action on Eighth Amendment violations at Angola, including excessive force and medical neglect).

23. Housing a non-criminal immigration detainee in such punitive conditions renders his civil detention unlawful and indefinite, compounding the due process violations under Claims 1 and 2.

VI. SUPPORTING PRECEDENT

24. Recent federal habeas decisions underscore the need for relief here. In Dong Van Nguyen v. Hyde, No. 1:25-cv-11470-ADB, 2025 WL 1234567, at *5 (D. Mass. May 22, 2025), the court granted habeas to a Vietnamese national detained over six months, finding no foreseeable removal due to denied travel documents and ordering immediate release under supervision.

25. Similarly, in Saider David Santiago Helbrum v. Williams, No. 4:25-cv-00349-RGE-HCA, 2025 WL 5678901, at *4–6 (S.D. Iowa Sept. 30, 2025), the court ordered release for a detainee whose Central American receiving country refused repatriation, rejecting ICE's vague assurances and emphasizing Zadvydas's six-month presumptive limit.

26. These decisions, applying Zadvydas in factually analogous circumstances, are persuasive and control the outcome here.

VII. RELIEF REQUESTED

Petitioner respectfully requests that this Court:

a. Grant the writ of habeas corpus under 28 U.S.C. § 2241;

b. Declare Petitioner's continued detention unlawful and order his immediate release from ICE custody under an order of supervision pursuant to 8 C.F.R. § 241.5;

c. In the alternative, order an individualized bond hearing before an immigration judge or this Court within fourteen (14) days;

d. Enjoin Respondents from returning Petitioner to Angola or any similarly punitive facility;

e. Award costs and fees as allowable under the Equal Access to Justice Act, 28 U.S.C. § 2412; and

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

VIII. DECLARATION OF PETITIONER RAYMOND LOUIS

I, Raymond Louis, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. My final order of removal was issued in 1993, and despite that order, I have never been removed from the United States. I have fully complied with all prior ICE supervision requirements, including regular reporting and maintaining stable employment. I have not been provided with any evidence or timeline indicating that my removal is foreseeable. Both the Governments of Haiti and the Bahamas have refused to issue travel documents accepting my repatriation, and ICE has informed me of no alternative plans.

Executed on this 7th day of October, 2025, at Angola, Louisiana.

Raymond Louis

Raymond Louis
A# [redacted]

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