

Shalai Dmitrii A# [REDACTED]  
Name and Prisoner Number/Alien Registration Number  
San Luis Regional Detention Center  
Place of Confinement  
P.O. Box 7710  
Mailing Address  
San Luis Az 85349  
City, State, Zip Code

FILED \_\_\_\_\_ LODGED \_\_\_\_\_  
RECEIVED \_\_\_\_\_ COPY \_\_\_\_\_  
NOV 20 2025  
CLERK U S DISTRICT COURT  
DISTRICT OF ARIZONA  
BY \_\_\_\_\_ DEPUTY

(Failure to notify the Court of your change of address may result in dismissal of this action.)

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

Shalai Dmitrii  
(Full Name of Petitioner)

Petitioner,

v.

San Luis Regional Detention Center  
(Name of Warden, Jailor or authorized person  
having custody of Petitioner)

Respondent.

CASE NO. CV-25-4002-PHX-SHD (JZB)  
(To be supplied by the Clerk)

PETITION UNDER 28 U.S.C. § 2241  
FOR A WRIT OF HABEAS CORPUS  
BY A PERSON IN FEDERAL CUSTODY

PETITION

1. What are you challenging in this petition?

- Immigration detention
- Bureau of Prisons sentence calculation or loss of good-time credits
- Probation, parole or supervised release
- Other (explain): \_\_\_\_\_

2. (a) Name and location of the agency or court that made the decision you are challenging: United States Department of Justice Executive Office for Immigration Review Oray Mesa Immigration Court 7488 Calzada de la Fuente San Diego CA 92154

(b) Case or opinion number: A# [REDACTED]

(c) Decision made by the agency or court: Order to deport [Exhibit 1] (1 copy)

(d) Date of the decision: 03.11.2025

THIS DOCUMENT IS NOT IN PROPER FORM ACCORDING TO FEDERAL AND/OR LOCAL RULES AND PRACTICES AND IS SUBJECT TO REJECTION BY THE COURT.

REFERENCE CIVIL 5.4  
(Case Number/Section)

3. Did you appeal the decision to a higher agency or court? Yes  No

If yes, answer the following:

(a) First appeal:

- (1) Name of the agency or court: 880 Front St 4240 Bldg San Diego CA 92101  
Immigration ICE Officer
- (2) Date you filed: 07.02.2025
- (3) Opinion or case number: \_\_\_\_\_
- (4) Result: I have not received yet
- (5) Date of result: \_\_\_\_\_
- (6) Issues raised: Release my from custody  
[Exhibit 2] (4 copy)

Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.

(b) Second appeal: Headquarters Post-Order Detention Unit US  
Departments of Homeland Security Immigration  
and Customs Enforcement 801 Street N.W. Suite  
800 Washington DC 20536

- (1) Name of the agency or court: \_\_\_\_\_
- (2) Date you filed: 09.10.2025
- (3) Opinion or case number: \_\_\_\_\_
- (4) Result: I have not received yet
- (5) Date of result: \_\_\_\_\_
- (6) Issues raised: release from custody  
[Exhibit 3] (3 copy)

Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.

(c) Third appeal:

- (1) Name of the agency or court: \_\_\_\_\_
- (2) Date you filed: \_\_\_\_\_
- (3) Opinion or case number: \_\_\_\_\_

(4) Result: \_\_\_\_\_

(5) Date of result: \_\_\_\_\_

(6) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.**

4. If you did not appeal the decision to a higher agency or court, explain why you did not: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Other than the appeals listed above, have you filed any other petitions, applications or motions concerning the issues raised in this petition? Yes  No

If yes, answer the following:

(a) Name of the agency or court: \_\_\_\_\_

(b) Date you filed: \_\_\_\_\_

(c) Opinion or case number: \_\_\_\_\_

(d) Result: \_\_\_\_\_

(e) Date of result: \_\_\_\_\_

(f) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.**

6. For this petition, state every ground on which you 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.

**CAUTION: To proceed in the federal court, you must ordinarily first exhaust (use up) your available administrative remedies on each ground on which you request action by the federal court.**

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

(a) Supporting FACTS (Do not argue or cite law. Just state the specific facts that support your claim.):

Zadvydas v Davis, 533 U.S. 678  
I have never been involved in any criminal activity nor associate myself with criminals while residing in U.S.  
I currently own (2) cars, Toyota Corolla and Cadillac Eldorado [Exhibit 4] (2 copy)  
I have an American friend who currently resides at the following address:  
I'm a psychology teacher and a father to 3 kids.  
I'm not a danger to a society.  
I have medical problems requiring immediate attention my condition is getting worse daily, ICE denies. I'm Russian and can barely communicate in English, I do not have an attorney, San Luis detention facility does not allow me to use a Law Library on site since I'm housed in a segregated single occupancy medical unit. [Exhibit 5] (1 copy)  
Please be aware that I do consider myself being worthy of an opportunity to be free. I'm not a flight risk and will be living at this address: 20600 Ventura Blv Woodland Hill CA 91364. Once freed I will patiently wait for my employment authorisation approval so I may gain a source of income to support myself and my family. I do agree in advance to any restrictions or stipulations should they be imposed by this court

(b) Did you exhaust all available administrative remedies relating to Ground One? Yes  No

(c) If yes, did you present the issue to:

- The Board of Immigration Appeals
- The Office of General Counsel
- The Parole Commission
- Other: \_\_\_\_\_

(d) If you did not exhaust all available administrative remedies relating to Ground One, explain why:

I have an additional grounds for my asylum application and will list them on the ground two.

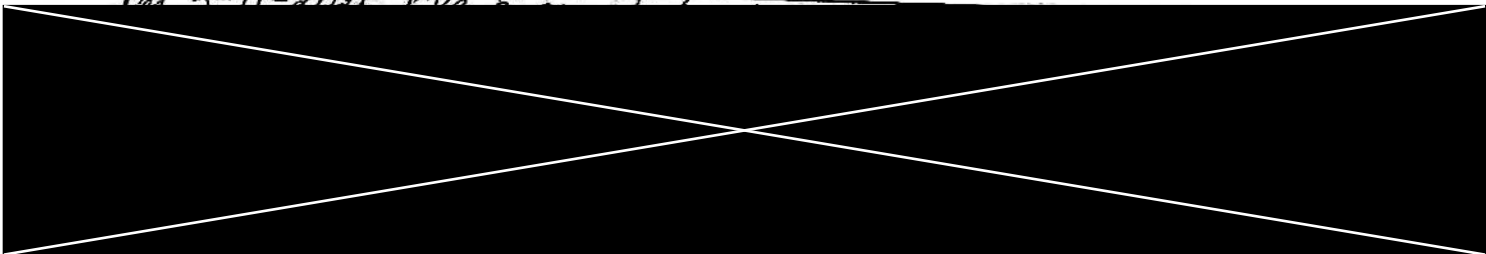
GROUND TWO: Unlawful detention

(a) Supporting FACTS (Do not argue or cite law. Just state the specific facts that support your claim.):

I have been fully cooperative with ICE during their attempts to deport me. I have filled out Russians Consuls application twice. Furnished a copy of my passport, drivers license Russian and Mexico as well as Temporal card of Mexico and submitted fingerprints and photos per ICE request. [Exhibit 6] (20 copy)

On 9-9-2024 I've personally arrived at my own accord at Dday Mesa San Diego ICE facility and requested immigrations officers assistance due to my documents being stolen at that point they have arrested me. [Exhibit 7] (3 copy)

On 3-11-2025 I've



Restrictions. I am willing to be released and will agree to any and all

(b) Did you exhaust all available administrative remedies relating to Ground Two? Yes  No

- (c) If yes, did you present the issue to:
- The Board of Immigration Appeals
  - The Office of General Counsel
  - The Parole Commission
  - Other: \_\_\_\_\_

(d) If you did not exhaust all available administrative remedies relating to Ground Two, explain why:

But I do not have an attorney and San Luis detention facility does not allow me to access their Law library facility or resources on site. ICE Representatives as well as San Luis detention center staff are actively and continuously preventing my ability to research and present my case. ICE transferred me to Arizona as to prevent me from securing a representation by a pro-bono attorney.





**Please answer these additional questions about this petition:**

7. Are you challenging your conviction or sentence in any of the grounds raised above? Yes  No   
(Claims challenging a federal conviction or sentence may only be raised in a motion under 28 U.S.C. § 2255, unless the § 2255 motion is legally inadequate or ineffective.)

If yes, answer the following:

(a) Have you filed a motion under 28 U.S.C. § 2255? Yes  No

If yes, answer the following:

(1) Name of court: \_\_\_\_\_

(2) Case number: \_\_\_\_\_

(3) Opinion or case number: \_\_\_\_\_

(4) Result: \_\_\_\_\_

(5) Date of result: \_\_\_\_\_

(6) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.**

(b) Explain why the remedy under § 2255 is inadequate or ineffective: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

8. If this case concerns immigration removal proceedings, answer the following:

(a) Date you were taken into immigration custody: 09-09-2024

(b) Date of removal or reinstatement order: \_\_\_\_\_

(c) Did you file an appeal with the Board of Immigration Appeals? Yes  No

(1) Date you filed: \_\_\_\_\_

(2) Case number: \_\_\_\_\_

(3) Result: \_\_\_\_\_

(4) Date of result: \_\_\_\_\_

(5) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.**

(d) Did you file an appeal with the federal court of appeals? Yes  No

(1) Name of the court: \_\_\_\_\_

(2) Date you filed: \_\_\_\_\_

(3) Case number: \_\_\_\_\_

(4) Result: \_\_\_\_\_

(5) Date of result: \_\_\_\_\_

(6) Issues raised: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Attach, if available, a copy of any brief filed on your behalf and a copy of the decision.**

9. Petitioner asks that the Court grant the following relief: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

or any other relief to which Petitioner may be entitled. (Money damages are not available in habeas corpus cases.)

I declare under penalty of perjury that the foregoing is true and correct and that this Petition for Writ of Habeas Corpus was placed in the prison mailing system on November 14 2025 (month, day, year).

Shalai Dmitrii   
Signature of Petitioner

\_\_\_\_\_  
Signature of attorney, if any

11.14.2025  
Date