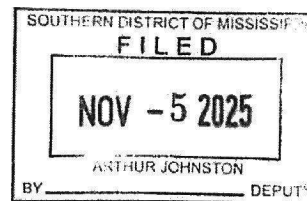


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF MISSISSIPPI  
WESTERN DIVISION



FARUK ATIK ADIR,

*Petitioner,*

v.


RAFAEL VERGARA, Warden of Adams County Correctional Center, MELLISSA HARPER, Director of U.S. Immigration and Customs Enforcement New Orleans Field Office, TODD M. LYONS, Acting Director of U.S. Immigration and Customs Enforcement, KRISTI NOEM, Secretary of the Department of Homeland Security, and PAMELA BONDI, U.S. Attorney General, *in their official capacities,*

*Respondents.*


Civil Action No.: *5:25-cv-123 DCB-BWR*

**VERIFIED PETITION FOR A WRIT OF HABEAS CORPUS  
PURSUANT TO 28 U.S.C. § 2241**

**INTRODUCTION**

1. Petitioner Faruk Atik Adir (“Petitioner” or “Mr. Adir”) fled his native Turkey and sought protection in the United States after being persecuted and imprisoned for 



 He came to the United States to seek asylum and reunite with his wife and their two young sons, who are U.S. lawful permanent residents living in Athens, Georgia. Mr. Adir turned himself in to immigration authorities near San Diego, California in January 2025, and has been in immigration detention ever since, despite being granted relief from removal to Turkey. He is currently detained in the

Adams County Correctional Center, a privately-run U.S. Immigration and Customs Enforcement (“ICE”) detention center in Natchez, Mississippi.

2. On May 6, 2025, an Immigration Judge granted Mr. Adir withholding of removal to Turkey based on the threats to his life or freedom he faces if deported there. The government is thus legally barred from deporting Mr. Adir to Turkey. And while the government may—under certain circumstances, and in accordance with applicable laws and rules and core due process principles—attempt to deport Mr. Adir to another country, it has not yet done so, and it is unlikely to do so within the reasonably foreseeable future.

3. Mr. Adir’s indefinite civil detention thus violates the Immigration and Nationality Act (“INA”), as interpreted by the Supreme Court in *Zadvydas v. Davis*, 533 U.S. 678 (2001), and his rights under the Due Process Clause of the Fifth Amendment. He is entitled to a writ of habeas corpus ordering his immediate release from ICE custody.

4. Upon filing of this Petition and payment of the required filing fee, Mr. Adir asks this Court to forthwith order Respondents “to show cause why the writ should not be granted . . . **within three days** unless for good cause additional time, not exceeding twenty days, is allowed,” as required by statute. 28 U.S.C. § 2243 (emphasis added).

#### JURISDICTION AND VENUE

5. Jurisdiction is proper under 28 U.S.C. §§ 1331 (federal question), 1651 (All Writs Act), 2201-02 (declaratory relief), and 2241 (habeas corpus), and the Suspension Clause, U.S. Const. art. I, § 9, cl. 2, because Mr. Adir is presently in custody under or by color of the authority of the United States in violation of the Constitution and laws of the United States.

6. District courts have jurisdiction to hear habeas petitions brought pursuant to 28 U.S.C. § 2241 by individuals in ICE custody who challenge the lawfulness of their detention

under federal law. *Zadvydas*, 533 U.S. at 687; *Ali v. Dep't of Homeland Sec.*, 451 F. Supp. 3d 703, 706 (S.D. Tex. 2020).

7. Venue is proper in the Southern District of Mississippi pursuant to 28 U.S.C. §§ 1391(b) and 2241(d) because Mr. Adir is confined within this district, his immediate custodian is located in this district, and a substantial part of the events or omissions giving rise to his claims occurred in this district.

### **PARTIES**

8. Petitioner Faruk Atik Adir is a Turkish citizen who is currently detained in the custody of Respondents at the Adams County Correctional Center in Natchez, Mississippi, despite being granted withholding of removal. He has been in ICE custody for over nine months, and he has been subject to a final order of removal since June 5, 2025.

9. Rafael Vergara is the Warden of the Adams County Correctional Center, an ICE detention center run by the private prison corporation CoreCivic, Inc. Accordingly, Respondent Vergara is Mr. Adir's immediate custodian; he is also a legal custodian of Mr. Adir. He is named in his official capacity.

10. Respondent Mellissa Harper is the Field Office Director of ICE's New Orleans Field Office, which has administrative jurisdiction over Mr. Adir's case and the Adams County Correctional Center. She is a legal custodian of Petitioner and is named in her official capacity.

11. Respondent Todd M. Lyons is the Acting Director of ICE, a component of the Department of Homeland Security ("DHS") that is responsible for enforcing the nation's immigration laws. He is a legal custodian of Petitioner and is named in his official capacity.

12. Respondent Kristi Noem is the Secretary of DHS. She is a legal custodian of Petitioner and is named in her official capacity.


13. Respondent Pamela Bondi is the Attorney General of the United States. She leads the Department of Justice, which has jurisdiction over the immigration court system and shares responsibility with DHS for enforcement of immigration laws. She is a legal custodian of Petitioner and is named in her official capacity.

### FACTS

14. Mr. Adir is a 39-year-old native and citizen of Turkey.

15. Mr. Adir is currently detained in the Adams County Correctional Center (“Adams”) in Natchez, Mississippi—an ICE detention center run by the private prison corporation CoreCivic, Inc.<sup>1</sup> Adams is the largest ICE detention center in the country, imprisoning over 2,000 people on any given day.<sup>2</sup> In 2021, the DHS Office of Inspector General issued a report documenting numerous violations of ICE detention standards at Adams that “threatened the health, safety, and rights of” people detained there.<sup>3</sup> Adams has also been the subject of numerous complaints of civil rights violations and abusive treatment, including torture.<sup>4</sup>

16. Mr. Adir’s wife and their two young sons, ages fourteen and eight, are U.S. lawful permanent residents. They reside in Athens, Georgia.

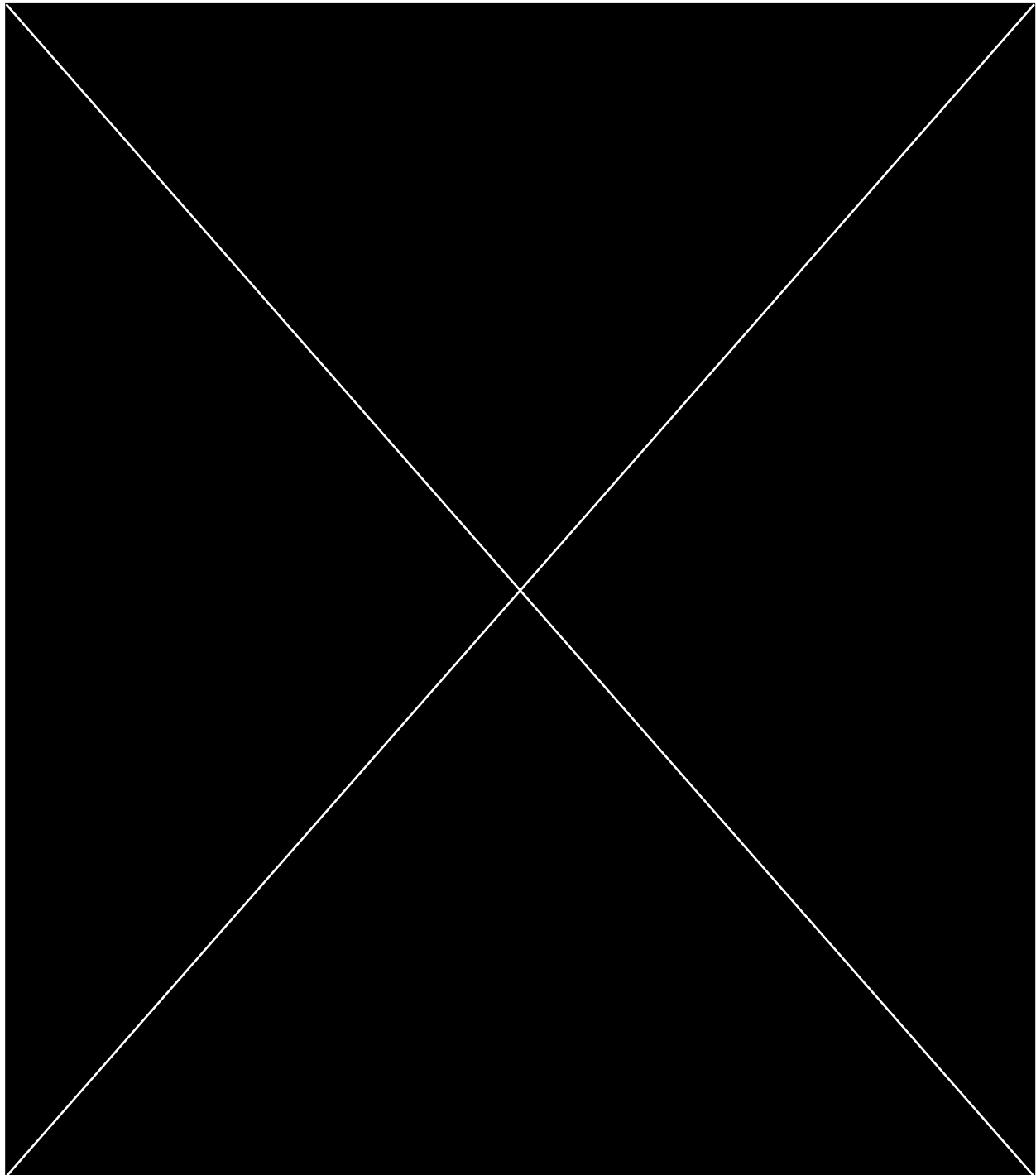
17. Mr. Adir fled Turkey after he was targeted, arrested, interrogated, threatened, and imprisoned for 

<sup>1</sup> CoreCivic, Adams County Detention Center, <https://bit.ly/49ATES6>.

<sup>2</sup> Transactional Records Access Clearinghouse, *Immigration Detention Quick Facts*, <https://bit.ly/4qJ5X4Z>.

<sup>3</sup> Dep’t of Homeland Security, Office of the Inspector General, *Violations of ICE Detention Standards at Adams County Correctional Center*, July 14, 2021, <https://bit.ly/4hIcCbz>.

<sup>4</sup> See, e.g., Physicians for Human Rts. et al., *Deadly Failures: Preventable Deaths in U.S. Immigration Detention* 9 (2024), <https://bit.ly/3WE6yqQ> (reporting detained person who died of heart attack at Adams who was not discovered by staff until 45 minutes after his heart attack); *id.* at 17 (reporting two deaths at Adams between 2017 and June 2024); Scott Hawkins, *SPLC files complaint against Adams County Correctional Facility, ICE, alleging inmate abuse*, THE NATCHEZ DEMOCRAT, Oct. 28, 2020, <https://bit.ly/4qPpy3F>; Alissa Zhu, *‘Treated like hell’: Mississippi ICE detainees say they don’t get enough food, medical care*, CLARION LEDGER, Dec. 20, 2019, <https://bit.ly/4i1TbLb>.



is still pending before the appellate court, and his sentence has not been finalized. He faces the risk of being rearrested and imprisoned and subjected to abusive treatment and torture, or possibly even killed, if he is forced to return to Turkey.

22. While Mr. Adir's trial was ongoing, his wife applied for and was granted a U.S. visa through the diversity visa lottery. In August 2024, she and their two young sons moved to the United States, settling in Athens, Georgia. Mr. Adir was not able to accompany them because of [REDACTED]

23. Fearing for his life and freedom, Mr. Adir made the decision to flee Turkey in December 2024 and seek asylum in the United States. Over the course of several weeks, he traveled through Asia, South and Central America, and Mexico, arriving at the U.S.-Mexico border in January 2025.

24. On or around January 10, 2025, Mr. Adir crossed the border, promptly turned himself in to U.S. Customs and Border Protection officials, and requested asylum. He was taken into custody and has remained in immigration custody ever since. He was initially detained in U.S. Customs and Border Protection custody in San Diego and then transferred to ICE custody in Arizona several weeks later.

25. On or around February 13, 2025, ICE transferred Mr. Adir to Adams.

26. After an initial credible fear interview, immigration officials concluded that Mr. Adir had shown a credible fear of returning to Turkey and placed him in removal proceedings in immigration court where he would be able to pursue relief from removal to Turkey based on his fear claims.

27. Based on the persecution he experienced in Turkey and the risk of torture and persecution he would face if he were forced to return there, Mr. Adir applied for asylum and other fear-based forms of relief from removal under the Immigration and Nationality Act and the Convention Against Torture.

28. On May 6, 2025, Immigration Judge (“IJ”) Alberto Depuy of the LaSalle Immigration Court in Jena, Louisiana denied Mr. Adir’s application for asylum and ordered him removed to Turkey, but granted him withholding of removal to Turkey under Section 241(b)(3) of the INA, which requires a finding that his “life or freedom would be threatened in that country because of [his] race, religion, nationality, membership in a particular social group, or political opinion.” 8 U.S.C. § 1231(b)(3). The IJ did not designate any alternative countries for removal in his order. Mr. Adir and the government both reserved the right to appeal the order. *See Exhibit 1, IJ Order.*

29. As a result of the IJ’s order granting Mr. Adir withholding of removal, the government is legally barred from deporting him to Turkey. *See Noem v. Abrego Garcia*, 145 S. Ct. 1017, 1018 (2025).

30. Neither Mr. Adir nor the government appealed the IJ’s order. Thus, his removal order became administratively final on June 5, 2025, when the 30-day deadline for filing an appeal expired. *See* 8 C.F.R § 1241.1(c).

31. Instead of releasing Mr. Adir from custody after he was granted withholding of removal and allowing him to reunite with his wife and children in Georgia, Respondents continued his detention.

32. On May 16, 2025, ICE issued a one-page, unsigned “Notice of Removal” stating their intent to deport Mr. Adir to Spain—a country where he has never been, and to which he has no ties whatsoever. **Exhibit 2, “Notice of Removal” to Spain.**

33. Since receiving the notice, Mr. Adir has not received any additional information from ICE officials or anyone else about ICE’s supposed plans to deport him to Spain, or to any other country.

34. Mr. Adir has no ties to any country other than the United States and Turkey. While he briefly transited through several countries before arriving in the United States, he did not spend more than a few days or weeks in any of those countries, and he has never held any legal status in any other country.

35. On August 21, 2025, undersigned counsel Ben Thorpe submitted a request to ICE to review Mr. Adir's custody and release him. The request included detailed information and supporting documents demonstrating that Mr. Adir—who has no criminal record in the United States or Turkey (other than the pending charge against him in Turkey that is the basis for his fear-based claims and withholding order), *see Exhibit 3, Criminal Record Check from Turkish Ministry of Justice*, and who has significant family and community ties in the U.S. through his wife and school-aged children in Georgia—is neither a flight risk nor a danger to the community.

36. On September 15, 2025, ICE issued Mr. Adir a Decision to Continue Detention letter. The letter is largely pro forma, with a single short paragraph stating, without explanation or evidence, and without acknowledging the extensive evidence submitted by Mr. Adir, that he has failed to demonstrate that he is not a flight risk, and claiming that “ICE is in receipt of or expects to receive necessary travel documents to effectuate your removal . . . .” *See Exhibit 4, September 15, 2025 Decision to Continue Detention Letter*. The letter does not indicate where ICE intends to deport him, and ICE has not since communicated with Mr. Adir about any ongoing removal efforts.

37. An ICE deportation officer at Adams has told Mr. Adir multiple times orally and in writing, including with the last month, that he would be deported to a third country and that he will be detained for a year or more until he is deported to a third country.

38. Mr. Adir's detention is impacting him and his family greatly. The fear that he may never leave detention as well as [REDACTED] have caused Mr. Adir to suffer depression and memory loss. He is also struggling to manage his diabetes on the diet provided at Adams.

39. Mr. Adir's wife and older son have sought and received mental health care, including medication, for the depression they are experiencing as a result of Mr. Adir's detention.

40. If released from ICE custody, Mr. Adir will reside with his wife and children in Athens, Georgia. He is willing to comply with any requirements imposed on him as a condition of his release.

## LEGAL FRAMEWORK

### I. Post-Removal Order Detention Under 8 U.S.C. § 1231

41. Section 1231 of Title 8 of the U.S. Code governs the detention of individuals who are subject to a legally final order of removal. *See* 8 U.S.C. § 1231(a).

42. Detention under Section 1231 is only mandatory during the initial ninety-day "removal period," 8 U.S.C. § 1231(a)(1)(A)—the time window during which the government is typically required to effectuate removal. The removal period "begins on the latest of the following:"

- (i) The date the order of removal becomes administratively final.
- (ii) If the removal order is judicially reviewed and if a court orders a stay of the removal of the alien, the date of the court's final order.
- (iii) If the alien is detained or confined (except under an immigration process), the date the alien is released from detention or confinement.

*Id.* § 1231(a)(1)(B).

43. When an individual is ordered removed by the IJ and does not pursue an appeal to

the BIA, his removal order becomes administratively final when the 30-day deadline for appeal expires, or immediately if he waives appeal. *See* 8 C.F.R. § 1241.1(b) and (c).

44. After the 90-day removal period, detention is no longer mandatory detention, and the individual should generally be released under conditions of supervision, such as periodic reporting. *See* 8 U.S.C. § 1231(a)(3); *see also id.* §1231(a)(6) (providing that certain inadmissible and removable noncitizens “may be detained beyond the removal period” if they are determined “to be a risk to the community or unlikely to comply with the order of removal”); 8 C.F.R. § 241.4 (detailing criteria and procedures for release of individuals detained beyond the removal period who do not pose a threat to the community or a significant flight risk).

45. The 90-day removal period may be extended if the individual “fails or refuses to make timely application in good faith for travel or other documents necessary to [his] departure or conspires or acts to prevent [his] removal.” *Id.* § 1231(a)(1)(C). Under these circumstances, the regulations require ICE to serve the individual with a Notice of Failure to Comply, advising her that the removal period has been extended and explaining the steps she must take in order to demonstrate compliance. *See* 8 C.F.R. § 241.4(g)(5)(ii). Detention is also discretionary during the time(s) when an individual’s removal period is extended pursuant to § 1231(a)(1)(C).

## **II. Constitutional Limitations on Detention under Section 1231**

46. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects.” *Zadvydas*, 533 U.S. at 690.

47. The Constitution imposes strict limits on the government’s post-removal period discretionary detention authority under Section 1231. In *Zadvydas*, the Supreme Court construed Section 1231(a)(6) to contain an “implicit ‘reasonable time’ limitation” in light of the “serious

constitutional problem” raised by potentially indefinite civil detention under the INA. 533 U.S. at 682, 690; *see also Clark v. Martinez*, 543 U.S. 371, 386 (2005) (extending *Zadvydas*’s holding to inadmissible noncitizens).

48. These limitations are rooted in the Due Process Clause of the Fifth Amendment. *See Zadvydas*, 533 U.S. at 690; *Tran v. Mukasey*, 515 F.3d 478, 482 (5th Cir. 2008) (“Applying the doctrine of constitutional avoidance, the court held [in *Zadvydas*] that ‘once removal is no longer reasonably foreseeable, continued detention is not authorized by the statute.’” (quoting 533 U.S. at 699)).

49. Civil immigration detention violates due process if it is not reasonably related to its statutory purpose. *See Zadvydas*, 533 U.S. at 690 (citing *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). The Supreme Court recognized that the statutory purpose of Section 1231 was to detain non-citizens with final orders of removal in order to effectuate removal. *Id.* at 697 (Section 1231’s “basic purpose” is to “effectuat[e] an alien’s removal.”). The government’s claim that post-order detention is justified to prevent flight and ensure compliance with a removal order is “weak or nonexistent” where removal is not foreseeable. *Id.* at 690. Even detention based on dangerousness is only permissible “when limited to specially dangerous individuals and subject to strong procedural protections.” *Id.*

50. The *Zadvydas* Court adopted a “presumptively reasonable period of detention” of six months, inclusive of the 90-day removal period. *Id.* at 701. “After this 6-month period, once the [noncitizen] provides good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future, the Government must respond with evidence sufficient to rebut that showing.” *Id.* After that point, the government must release the individual unless it can show some “sufficiently strong special justification” for continuing his detention. *Id.* at 690-91,

701.

51. The core inquiry under *Zadvydas* is whether there is a “significant likelihood of removal in the reasonably foreseeable future.” *Andrade v. Gonzales*, 459 F.3d 538, 543 (5th Cir. 2006) (quoting *Zadvydas*, 533 U.S. at 701). The Court adopted the six-month presumptive period as a matter of practical necessity and “for the sake of uniform administration in the federal courts.” *Zadvydas*, 533 U.S. at 701. It is a rebuttable presumption—not a jurisdictional requirement or a required element of a *Zadvydas* claim. *See Ali v. Dep’t of Homeland Security*, 451 F. Supp. 3d 703, 707-08 (S.D. Tex. 2020) (holding that the “six-month presumption is not a bright line” and that *Zadvydas* “did not require a detainee to remain in detention for six months ... before a habeas court could find that the detention is unconstitutional”); *Jabir v. Ashcroft*, No. Civ.A. 03-2480, 2004 WL 60318, at \*8 (E.D. La. Jan. 8, 2004) (“While the shifting scales of reasonableness weigh heavily in favor of the authority of the Executive to detain a removable alien during the initial six-months of detention, those scales increasingly shift in favor of a detainee as the period of detention extends beyond six months and the likelihood of removal remains remote.”).

52. Under the *Zadvydas* standard, a habeas petitioner is not required to show that her removal is “impossible,” but rather only that it is unlikely; conversely, a mere claim by the government that “good faith efforts to effectuate . . . deportation continue” is not sufficient to justify continued detention after six months. *See Zadvydas*, 533 U.S. at 702 (vacating Fifth Circuit judgment employing these standards because they “demand[] more than our reading of the statute can bear”); *see also Sharifi v. Gillis*, No. 5:20-CV-5-DCB-MTP, 2020 WL 7379211, at \*3 (S.D. Miss. Oct. 9, 2020) (“[A] theoretical possibility of eventually being removed does not satisfy the government's burden once the removal period has expired and the petitioner

establishes good reason to believe his removal is not significantly likely in the reasonably foreseeable future.” (quotations and citations omitted)), *report and recommendation adopted*, 2020 WL 7364984 (S.D. Miss. Dec. 15, 2020).

53. Release is the proper remedy for unlawfully prolonged post-removal-order detention. *See Zadvydas*, 533 U.S. at 699–700 (explaining that supervised release is the appropriate relief when “the detention in question exceeds a period reasonably necessary to secure removal” because, at that point, detention is “no longer authorized by statute”); *see also*, e.g., *Carreno v. Gillis*, No. 5:20-CV-44-KS-MTP, 2020 WL 8366735, at \*3 (S.D. Miss. Dec. 16, 2020), *report and recommendation adopted*, 2021 WL 310971 (S.D. Miss. Jan. 29, 2021) (granting *Zadvydas* habeas petition and ordering petitioner’s release).

## **CLAIMS FOR RELIEF**

### **COUNT ONE**

#### **Violation of The Immigration and Nationality Act – 8 U.S.C. § 1231**

54. Mr. Adir repeats and realleges each allegation contained above.

55. Mr. Adir is confined in Respondents’ custody pursuant to the INA’s discretionary post-removal period detention provision, 8 U.S.C. § 1231(a)(6), because more than 90 days have elapsed since his removal order became administratively final on June 5, 2025. *See* 8 U.S.C. § 1231(a)(1)(A), (2); 8 C.F.R. § 1241.1.

56. In *Zadvydas*, the Supreme Court construed Section 1231(a)(6) to contain an implicit reasonableness limitation in order to prevent indefinite civil detention in violation of due process. 533 U.S. at 690, 701. “[O]nce removal is no longer reasonably foreseeable, continued detention is not authorized by the statute.” *Tran*, 515 F.3d at 482 (quoting *Zadvydas*, 533 U.S. at 699).

57. There is no significant likelihood of Mr. Adir’s removal in the reasonably foreseeable future. With respect to Turkey, Mr. Adir’s country of birth and citizenship, and the only country in the world other than the United States to which he has any ties, the government is legally barred from deporting him there. *See Abrego Garcia*, 145 S. Ct. at 1018 (“The United States acknowledges that Abrego Garcia was subject to a withholding order forbidding his removal to El Salvador, and that the removal to El Salvador was therefore illegal.”). Accordingly, “the circumstances of [Mr. Adir’s] status [and] the existence of the particular individual barriers to his repatriation to his country of origin”—namely, the Immigration Judge’s withholding order—“are such that there is no significant likelihood of removal in the foreseeable future.” *Sharifi*, 2020 WL 7379211, at \*1 (quoting *Galtogbah v. Sessions*, No. 6:18-cv-00880, 2019 WL 3766280, at \*2 (W.D. La. June 18, 2019)).

58. Nor have Respondents provided information to Mr. Adir regarding any specific plans to deport him to another country or sought Mr. Adir’s cooperation in any third-country deportation efforts. Thus, there is no significant likelihood of his removal to any other country. *See id.* at \*3 (explaining that a “theoretical possibility of eventually being removed does not satisfy the government’s burden” under *Zadvydus*); *Zavvar v. Scott*, No. CV 25-2104-TDC, 2025 WL 2592543, at \*5 (D. Md. Sept. 8, 2025) (finding removal not reasonably foreseeable where petitioner had been granted withholding and government had no concrete plan for third-country removal).

59. Thus, Mr. Adir’s continued detention violates Section 1231, and he is entitled to immediate release from Respondents’ custody.

## **COUNT TWO**

### **Violation of the Due Process Clause of the Fifth Amendment to the U.S. Constitution**

60. Mr. Adir repeats and realleges each allegation contained above.

61. The Due Process Clause of the Fifth Amendment forbids the government from depriving any person of liberty without due process of law. U.S. Const. amend. V. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty” that the Due Process Clause Protects. *Zadvydas*, 533 U.S. at 690 (citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)).

62. Civil immigration detention violates due process if it is not reasonably related to its statutory purpose. *See id.* (citing *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). The Supreme Court recognized that the statutory purpose of Section 1231 is to detain noncitizens with final orders of removal to effectuate removal. *Id.* at 697.

63. Prolonged civil detention also violates due process unless it is accompanied by strong procedural protections to guard against the erroneous deprivation of liberty. *Id.* at 690–91.

64. Mr. Adir’s prolonged civil detention has extended well beyond the 90-day removal period and will continue into the indefinite future. His detention is no longer reasonably related to the primary statutory purpose of effectuating removal.

65. Nor have Respondents afforded Mr. Adir minimally adequate procedural protections against the erroneous deprivation of his liberty.

66. Thus, Mr. Adir’s detention violates both substantive and procedural due process.

#### **PRAYER FOR RELIEF**


WHEREFORE, Petitioner Faruk Atik Adir prays that the Court grant the following relief:

- A. Assume jurisdiction over this matter;
- B. Issue an order to show cause to be returned within three days and set a hearing on this Petition within five days of the return pursuant to 28 U.S.C. § 2243;

- C. Enjoin Respondents from transferring Petitioner outside of this judicial district pending litigation of this matter;
- D. Declare that Petitioner's detention violates the Immigration and Nationality Act;
- E. Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment;
- F. Order the immediate release of Petitioner;
- G. Award Petitioner reasonable costs and attorneys' fees pursuant to the Equal Access to Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412; and
- H. Grant any other relief that this Court deems just and proper.

Dated: November 5, 2025

Respectfully submitted,

  
s/ Korbin Felder  
D. Korbin Felder, MS Bar No. 106643  
CENTER FOR CONSTITUTIONAL RIGHTS  
P.O. Box 12046  
Jackson, MS 39236  
Tel: 601-228-610  
Fax: 212-614-6497  
kfelder@ccrjustice.org

C.J. Sandley\*  
Jessica Myers Vosburgh\*  
CENTER FOR CONSTITUTIONAL RIGHTS  
P.O. Box 486  
Birmingham, AL 35201  
Tel: (212) 614-6492  
csandley@ccrjustice.org  
jvosburgh@ccrjustice.org

Ben W. Thorpe\*  
BONDURANT MIXSON & ELMORE LLP  
1201 W. Peachtree Street NW, Suite 3900  
Atlanta, GA 30309  
Tel: (404) 881-4100  
Fax: (404) 881-4111  
bthorpe@bmelaw.com

*\*pro hac vice application forthcoming*

*Pro Bono Counsel for Petitioner*

**VERIFICATION PURSUANT TO 28 U.S.C. § 2242**

Undersigned counsel submits this verification on behalf of the Petitioner. Undersigned counsel has discussed with Petitioner the events described in this Petition for Writ of Habeas Corpus and, on the basis of those discussions, verify that the statements in the Petition are true and correct to the best of our knowledge.

Dated: November 5, 2025

*s/ C.J. Sandley* \_\_\_\_\_

*Counsel for Petitioner*