

PETITION FOR WRIT OF HABEAS CORPUS

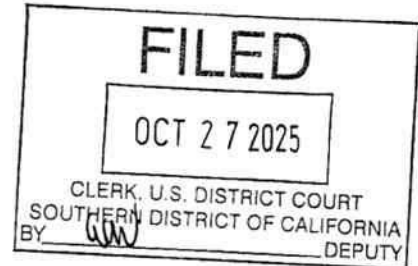
Under 28 U.S.C. § 2241 and the Supreme Court's decision in *Zadvydas v. Davis*, 533 U.S. 678 (2001)

From:

Norair Nikogosian

A# [REDACTED]

San Luis Regional Detention Center
406 North Avenue D, San Luis, AZ 85349



To:

The Honorable Judge
United States District Court for the Southern District of California
Clerk's Office
333 West Broadway, Suite 420
San Diego, CA 92101
United States

'25CV2922 AGS VET

Honorable Court,

My name is Norair Nikogosian. I have been in ICE custody since August 10, 2024. On March 20, 2025, I was transferred from the Otay Mesa Detention Center (California) to the San Luis Regional Detention Center (Arizona). I respectfully petition this Court for a writ of habeas corpus, as my detention has exceeded 180 days and removal cannot be accomplished within a reasonable period, in violation of *Zadvydas v. Davis*.



LEGAL BASIS

In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court held that immigration authorities cannot detain a noncitizen for more than 180 days after a final removal order if deportation is not reasonably foreseeable. Continued detention violates the Fifth Amendment of the U.S. Constitution.

STATEMENT OF FACTS

1. My detention has exceeded 180 days after the removal order became final, and removal has not been carried out.
2. I have fully cooperated with ICE, as evidenced by numerous Deportation Department Request Forms (April– September 2025), a signed Personal Interview Request with interpreter (August 12, 2025, Officer Jorge Hernandez), and written correspondence with Officer Miguel Aguilar.
3. ICE's Notice to Alien of File Custody Review, dated July 16, 2025, explicitly states that if removal cannot be executed within 90 days, ICE must consider release under an Order of Supervision.
4. I have a reliable U.S. citizen sponsor, Andre Asatryan (Date of Birth: [REDACTED] Passport No. [REDACTED]), residing in California and willing to provide housing and supervision upon my release.

List of Documents Provided

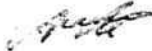
1. Petition for Writ of Habeas Corpus
Filed on behalf of detainee Norair Nikogosian, San Luis Regional Detention Center, Arizona.
2. Money Order – \$5.00
Habeas Corpus Filing Fee for Norair Nikogosian, A: 
3. Sponsorship Packet from Andre Asatryan
Includes Letter of Support, Form I-134, Certificate of Naturalization, and Tax Returns.
4. Copy of Expired Russian Passport
Passport No.  issued to Norair Nikogosian.
5. Immigration Judge Decision (Otay Mesa Immigration Court)
Order dated March 10, 2025 – Withholding of Removal granted, deferral approved.
6. ICE Detention Confirmation (Online Record)
Confirms custody at San Luis Regional Detention Center, AZ.
7. ICE Notice of File Custody Review (dated July 16, 2025)
Notice that custody will be reviewed after 90 days; possibility of release under supervision.
8. ICE Interview Request Form (dated September 25, 2025)
Shows detainee's cooperation and participation in custody review interview.
9. Email Correspondence with ICE Officer Miguel Aguilar (July 14, 2025)
Confirms ongoing cooperation and pending travel document request from Russia.
10. Copy of Brother's California ID (Edvard Nikoghosyan)
Proof of family support and U.S. residence.
11. Letter of Support from Brother (Edvard Nikoghosyan)
Requests release based on family ties, good conduct, and Zadvydas v. Davis precedent.

October 21, 2025

To whom it may concern:

I Andre Asatryan reaffirm my continued willingness and financial ability to sponsor Mr. Norair Nikogosian as of October 2025.

Sincerely,



Andre Asatryan

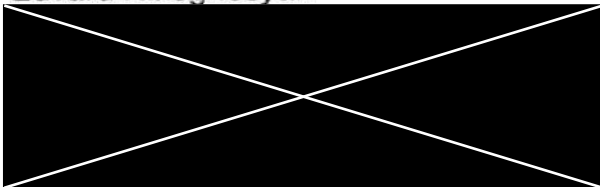
Letter of Support for Norair Nikogosian

To:

Honorable Judge
U.S. District Court for the District of Arizona
401 West Washington Street, Suite 130
Phoenix, AZ 85003

From:

Edvard Nikoghosyan



Subject: Letter in Support of My Brother, Norair Nikogosian

Dear Judge,

My name is **Edvard Nikoghosyan**, and I am the brother of **Norair Nikogosian**. I am writing to respectfully request your compassionate consideration of my brother's case and support his release from ICE custody.

Norair has been in detention since **August 2024**. During this time, he has shown himself to be a responsible and law-abiding person. He has fully cooperated with ICE officers, complied with all requirements, had no disciplinary issues, and demonstrated respectful behavior.

I confirm that my brother has strong family and community ties in the United States. He does not pose a danger to the community and deserves the opportunity to continue his life under supervision or any other conditions the Court deems appropriate.

I would also like to note that his prolonged detention already exceeds the reasonable period established by the U.S. Supreme Court decision in **Zadvydas v. Davis (533 U.S. 678, 2001)**. ICE is obligated to review his case and consider release if removal cannot be accomplished within 90 to 180 days.

My brother continues to cooperate fully with the authorities and provides all required documents. I respectfully ask the Court to consider his release based on humanitarian reasons and his positive conduct.