

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

OMAR RAMOS JIMENEZ,

Petitioner,

v.

TAMMY MARICH, Acting Director of Buffalo
Field Office, U.S. Immigration and Customs
Enforcement; TODD LYONS, Acting Director,
U.S. Immigration and Customs Enforcement,
KRISTI NOEM, Secretary of the U.S. Department
of Homeland Security,

Respondents.

Civil Action No. 25-cv-6733

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

INTRODUCTION

This is a petition for a writ of habeas corpus filed on behalf of Omar Ramos Jimenez, seeking relief to remedy his unlawful detention pursuant to 28 U.S.C. § 2241. Petitioner, Omar Ramos Jimenez, is a native and citizen of Mexico. On December 3, 2025, Immigration and Customs Enforcement (ICE) agents took Mr. Ramos Jimenez into custody when he reported in for what he was told was a routine check-in appointment at the Buffalo ICE Field Office. Upon information and belief Mr. Ramos Jimenez is being held in ICE custody at the Buffalo Service Processing Center in Batavia, New York.

Accordingly, to vindicate Petitioner's statutory, constitutional, and regulatory rights, this Court should grant the instant petition for a writ of habeas corpus. Petitioner asks this Court to find that he was unlawfully detained and to order his release.

CUSTODY

1. Mr. Ramos Jimenez is in the physical custody of Respondent Tammy Marich, Acting Field Office Director for Detention and Removal, Buffalo Field Office, U.S. Immigration and Customs Enforcement (ICE), the Department of Homeland Security (DHS), as well as Todd Lyons, Acting Director of ICE, and Kristi Noem, Secretary of DHS. Upon information and belief Petitioner is currently being detained at the Buffalo Service Processing Center in Batavia, New York. Mr. Ramos Jimenez is under the direct control of Respondents and their agents.

JURISDICTION

2. This action arises under the Constitution of the United States, the Immigration and Nationality Act (“INA”), 8 U.S.C. § 1101 et. seq., as amended by the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (“IIRIRA”), Pub. L. No. 104-208, 110 Stat. 1570. This Court has jurisdiction under 28 U.S.C. 2241, art. I, § 9, cl. 2 of the United States Constitution (“Suspension Clause”) and 28 U.S.C. § 1331, as Petitioner is presently in custody under color of authority of the United States and such custody is in violation of the U.S. Constitution, laws, or treaties of the United States. This Court may grant relief pursuant to 28 U.S.C. § 2241, and the All Writs Act, 28 U.S.C. § 1651.

VENUE

3. Venue is proper in the Western District of New York because Petitioner is currently detained at the Buffalo Service Processing Center in Batavia, New York, under color of the authority of the United States, in violation of the Constitution, laws or treaties thereof. 28 U.S.C. §§ 1391, 2241.

PARTIES

4. Petitioner Omar Ramos Jimenez was detained by ICE on December 3, 2025. Upon

information and belief he remains in immigration custody at the Buffalo Service Processing Center in Batavia, New York.

5. Respondent Kristi Noem is the Secretary of DHS and is Petitioner's ultimate legal custodian. She is sued in her official capacity.

6. Respondent Tammy Marich is the Acting Field Office Director for ICE Enforcement and Removal Operations in ICE's Buffalo Field Office. She is one of Petitioner's legal custodians and is sued in her official capacity.

7. Respondent Todd Lyons is the Acting Director for ICE. He is one of Petitioner's legal custodians and is sued in his official capacity.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

8. On July 8, 2025, ICE, "in coordination with" the Department of Justice, announced a new policy that rejected this well-established understanding of the statutory framework and abruptly reversed decades of practice.

9. The new policy, entitled "Interim Guidance Regarding Detention Authority for Applicants for Admission," claims that all persons who entered the United States without admission or parole shall now be deemed "applicants for admission" under 8 U.S.C. § 1225, and therefore subject to mandatory detention under § 1225(b)(2)(A). The policy applies regardless of when a person was apprehended and applied those who have been in the United States for months, years, and even decades.

10. On September 5, 2025, in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), the Board of Immigration Appeals (BIA) issued a decision which purports to require the Immigration Court to unlawfully deny a bond hearing to all persons such as Petitioner.

11. The responsible administrative agency has therefore predetermined that Petitioner will be denied a bond hearing.

12. There is no statutory requirement for Petitioner to exhaust administrative remedies before immigration detention may be challenged in federal court, although exhaustion is generally required as a prudential matter. *See Paz Nativi v. Shanahan*, No. 16-CV-8496 (JPO), 2017 WL 281751, at *1-2 (S.D.N.Y. Jan. 23, 2017) (collecting cases). “Exhaustion of administrative remedies may not be required when: (1) available remedies provide no genuine opportunity for adequate relief; (2) irreparable injury may occur without immediate judicial relief; (3) administrative appeal would be ‘futile’; and (4) in certain instances a plaintiff has raised a ‘substantial constitutional question.’” *Guitard v. U.S. Sec’y of Navy*, 967 F.2d 737, 740 (2d Cir. 1992) (quoting *Von Hoffburg v. Alexander*, 615 F.2d 633, 638 (5th Cir. 1980).

13. The Immigration Court lacks jurisdiction to adjudicate the constitutional claims raised by Petitioner, and any attempt to raise such claims would be futile. *See Flores-Powell*, 677 F. Supp. 2d at 463 (holding “exhaustion is excused by the BIA’s lack of authority to adjudicate constitutional questions and its prior interpretation” of the relevant statute).

STATEMENT OF FACTS

14. Petitioner is a national and citizen of Mexico.

15. Petitioner last entered the United States without inspection on or around September 29, 2004.

16. After his entry he moved to the Rochester, New York area, where he has remained since.

17. Petitioner was previously taken into ICE custody on July 30, 2013 in Rochester, New York.

18. During that encounter he was processed for removal proceedings. He was issued a Notice to Appear which charged him as an alien present in the United States who had not been admitted

or paroled.

19. Petitioner was released from ICE custody on or around July 31, 2013. The record reflects that he was released upon a bond payment of \$1,500 made to ICE.

20. Since his release in July 2013 Petitioner has been dutifully complying with all terms of his release, including by reporting to ICE through regular check-ins. Over the years he has been reporting by phone as well as in person whenever ordered.

21. Petitioner also reported to all scheduled immigration court hearings in his removal case. He presented two sets of applications for relief from removal – applications for protection from persecution (asylum, withholding of removal and protection under the Convention Against Torture) as well as an application for cancellation of removal pursuant to 8 U.S.C. § 1229b(b)(1). On July 24, 2020, the Immigration Judge denied Petitioner’s applications for relief from removal.

22. On August 20, 2020, Petitioner timely appealed the decision of the Immigration Judge. He submitted a brief in support of that appeal on May 26, 2022, and on October 23, 2023, the Board of Immigration Appeals (“BIA”) removed the Petitioner’s case from its active docket. On March 6, 2025, Petitioner’s case was placed back on the active docket; his appeal remains pending before the BIA.

23. Petitioner has been residing in the New York area with his family for over twenty-one years since his last entry. He is married and is raising his fifteen-year-old U.S. citizen son; he has a very close relationship with his adult U.S. citizen daughter. He is extremely involved in and connected to his Rochester community. As part of his immigration case over one hundred letters of support were submitted from community members. He has been working for the same employer for over eight years and works in maintenance, snow removal and yard work both for his employer, for private clients, and as a volunteer for his elderly neighbors. He has been paying his taxes and has

no criminal history.

24. As noted previously, Petitioner has been complying with the terms of his release from ICE since 2013. At first he was reporting weekly in person, then immigration officers were visiting his home, then his reporting became monthly. For most of the past twelve years of reporting he would receive a phone call from an automated ICE system on the same day of the month after which he would text his reporting officer to show his compliance. The phone calls always came on the 10th day of the month.

25. On Monday, December 1, 2025, Petitioner received a phone call from ICE. The caller indicated that they were moving over to a new system for reporting that would require him to install an application on his cell phone through which he would be able to report. He was told he needed to appear in person at the Buffalo ICE Field Office to have the application installed. Petitioner appeared at the office as scheduled. He was immediately taken into custody. No attempts were made by ICE officers to install any application on his phone or discuss continued reporting in any way. Petitioner, through counsel, asked why he was being taken into custody despite the fact that he had paid a bond and was in compliance with his reporting. Petitioner was told by ICE officers that their decision to take him into custody was due to changes in presidential priorities and policies and to ensure his future attendance at court hearings. When Petitioner's counsel indicated he did not have any scheduled court hearings but was awaiting a decision on his appeal the ICE officers responded that by taking him into custody his appeal decision would thus be expedited.

26. Petitioner faces imminent transfer outside of this judicial district and faces removal from the United States.

27. Petitioner was re-detained without any notice, any hearing, or any individualized

determination of dangerousness or flight risk. After over twelve years of dutiful compliance on his reporting and never missing a court date or check in, Petitioner was lured into custody under false pretenses and snatched from his family and community.

28. Due process requires the government to provide noncitizens with notice and a hearing prior to re-detention, and that re-detention, without prior notice, a showing of changed circumstances, or a meaningful opportunity to respond does not satisfy the procedural requirements of the Fifth Amendment.

29. Petitioner intends to request bond relief from an immigration judge under 8 U.S.C. § 1226(a), which governs the detention of individuals already in the United States pending the outcome of removal proceedings. *See Jennings v. Rodriguez*, 583 U.S. 281, 289 (2018).

30. Petitioner poses no danger to others nor is he a flight risk.

31. On information and belief, DHS has alleged or will allege that Petitioner was not previously admitted or paroled into the United States and is subject to 8 U.S.C. § 1225(b)(2)(A). They will state that he is not bond eligible under *Matter of Yajure Hurtado*, 26 I&N Dec. 216.

32. Petitioner cannot be subject to mandatory detention under 8 U.S.C. § 1225(b)(2), for reasons including because, as a person already present in the United States, Petitioner is not currently “seeking admission” to the United States.

33. As a person detained under 8 U.S.C. § 1226(a), Petitioner must, upon his request, receive a custody redetermination hearing (colloquially called a “bond hearing”) with strong procedural protections.

34. The Western District of New York has already determined, on numerous occasions, that Petitioners such as Mr. Ramos Jiminez, who are present without admission and who were not apprehended at or near arrival, are detained pursuant to 8 U.S.C. § 1226; and not subject to

mandatory detention under 8 U.S.C. § 1225(b)(2) as the government contends. *Alvarez Ortiz v. Freden*, No. 25-cv-0960, 2025 WL 3085032 (W.D.N.Y. Nov. 4, 2025); *Quitizaca Quituisaca v. Bondi*, No. 25-cv-6527, 2025 WL 3264440 (W.D.N.Y. Nov. 24, 2025).

CLAIMS FOR RELIEF

COUNT ONE

Violation of 8 U.S.C. § 1226(a) and Associated Regulations

35. The allegations in the above paragraphs are realleged and incorporated herein.
36. Under 8 U.S.C. § 1226(a) and its associated regulations, Petitioner is entitled to a bond hearing. See 8 C.F.R. §§ 236.1(d), 1003.19(a)-(f).
37. Petitioner has not been, and will not be, provided with a bond hearing as required by law.
38. Petitioner's continuing detention is therefore unlawful.

COUNT TWO

Violation of Fifth Amendment Right to Due Process (Failure to Provide Bond Hearing Under 8 U.S.C. § 1226(a))

39. Because Petitioner is a person arrested inside the United States and is subject to detention, if at all, under 8 U.S.C. § 1226(a), the Due Process Clause of the Fifth Amendment to the United States Constitution requires that Petitioner receive a bond hearing with strong procedural protections.
40. Petitioner has not been, and will not be, provided with a bond hearing as required by law.
41. Petitioner's continuing detention is therefore unlawful.

COUNT THREE

Violation of Fifth Amendment Right to Due Process (Failure to Provide an Individualized Hearing for Domestic Civil Detention)

42. "In our society liberty is the norm, and detention prior to trial or without trial is the carefully limited exception." *United States v. Salerno*, 481 U.S. 739, 755 (1987).

43. The Fifth Amendment’s Due Process Clause specifically forbids the Government to “deprive[]” any “person . . . of . . . liberty . . . without due process of law.” U.S. CONST. amend. V.

44. “[T]he Due Process Clause applies to all ‘persons’ within the United States, including aliens, whether their presence is lawful, unlawful, temporary, or permanent.” *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001); see *Shaughnessy v. United States ex rel. Mezei*, 345 U.S. 206, 212 (1953) (“[A]liens who have once passed through our gates, even illegally, may be expelled only after proceedings conforming to traditional standards of fairness encompassed in due process of law”); cf. *Department of Homeland Security v. Thuraissigiam*, 591 U.S. 103, 139-40 (2020) (holding noncitizens due process rights were limited where the person was not residing in the United States, but rather had been arrested 25 yards into U.S. territory, apparently moments after he crossed the border while he was still “on the threshold”).

45. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty” protected by the Due Process Clause. *Zadvydas*, 533 U.S. 678, 679 (2001).

46. The Supreme Court has thus “repeatedly recognized that civil commitment for any purpose constitutes a significant deprivation of liberty that requires due process protection,” including an individualized detention hearing. *Addington v. Texas*, 441 U.S. 418, 425 (1979) (collecting cases); see also *Salerno*, 481 U.S. at 755 (requiring individualized hearing and strong procedural protections for detention of people charged with federal crimes); *Foucha v. Louisiana*, 504 U.S. 71, 81-83 (1992) (same for civil commitment for mental illness); *Kansas v. Hendricks*, 521 U.S. 346, 357 (1997) (same for commitment of sex offenders).

47. Petitioner was arrested inside the United States and is being held without any individualized custody hearing. Petitioner was re-detained after a prior release and payment of an ICE bond. In 2013 a determination was made that he was not a danger to the community and that payment of the bond would ensure he was not a flight risk. In the twelve years since there have been no changed circumstances justifying re-detention. Having been detained without any notice or opportunity to respond, or any assessment of his flight risk or dangerousness, is a violation of due process.

48. Petitioner's continuing detention is therefore unlawful, regardless of what statute might apply to purportedly authorize such detention.

COUNT FOUR
Violation of Fifth Amendment Right to Due Process
(Substantive Due Process)

49. Because Petitioner is not being provided a bond hearing, the government is not taking any steps to effectuate its substantive obligation to ensure that immigration detention bears a "reasonable relation" to the purposes of immigration detention (*i.e.*, the prevention of flight and danger to the community during the pendency of removal proceedings) and is not impermissibly punitive. *See Zadvydas*, 533 U.S. at 690; *Demore*, 538 U.S. at 532-33 (Kennedy, J., concurring).

50. Petitioner's detention is therefore unlawful, regardless of what statute might apply to purportedly authorize such detention.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Assume jurisdiction over this matter;
2. Enjoin Respondents from transferring the Petitioner outside the jurisdiction of the Buffalo Field Office pending the resolution of this case;

3. Order Respondents not to remove Petitioner from the State of New York;
4. Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately, or, in the alternative, ordering Respondents to provide Petitioner with a constitutionally adequate, individualized hearing before an impartial adjudicator at which Respondents bear the burden of establishing that Petitioner's continued detention is justified;
5. Award Petitioner his costs and reasonable attorneys' fees in this action as provided for by the Equal Access to Justice Act, 28 U.S.C. § 2412, or other statute; and
6. Grant such further relief as the Court deems just and proper.

Respectfully submitted this 3rd day of December 2025,

/s/ Grace Zaiman
Grace Zaiman
250 Mill St
Rochester, NY 14614
(585) 210-9868

VERIFICATION BY SOMEONE ACTING ON PETITIONER'S BEHALF
PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Omar Ramos Jimenez, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated: December 3, 2025

/s/Grace Zaiman
Grace E. Zaiman
Attorney for Petitioner
250 Mill St,
Rochester, NY 14614
Email: grace@zaimanlaw.com
Tel: 585-210-9868

JS 44 (Rev. 12/07)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON THE REVERSE OF THE FORM.)

<p>I. (a) PLAINTIFFS Omar Ramos Jimenez</p> <p>(b) County of Residence of First Listed Plaintiff <u>Genesee</u> (EXCEPT IN U.S. PLAINTIFF CASES)</p> <p>(c) Attorney's (Firm Name, Address, and Telephone Number) Grace Zaiman, Esq 250 Mill St Rochester NY 14614 585-210-9868</p>	<p>DEFENDANTS Tammy Marich, et al</p> <p>County of Residence of First Listed Defendant <u>Genesee</u> (IN U.S. PLAINTIFF CASES ONLY)</p> <p>NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE LAND INVOLVED.</p> <p>Attorneys (If Known) US Attorney's Office WDNY 138 Delaware Avenue, Buffalo, NY 14202 (716) 843-5700</p>
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<p>II. BASIS OF JURISDICTION (Place an "X" in One Box Only)</p> <p><input type="checkbox"/> 1 U.S. Government Plaintiff</p> <p><input checked="" type="checkbox"/> 2 U.S. Government Defendant</p> <p><input type="checkbox"/> 3 Federal Question (U.S. Government Not a Party)</p> <p><input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)</p>	<p>III. CITIZENSHIP OF PRINCIPAL PARTIES(Place an "X" in One Box for Plaintiff and One Box for Defendant)</p> <p>(For Diversity Cases Only)</p> <table style="width:100%;"> <tr> <td style="width:33%;">Citizen of This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 1</td> <td style="width:10%;">DEF <input type="checkbox"/> 1</td> <td style="width:33%;">Incorporated <i>or</i> Principal Place of Business In This State</td> <td style="width:10%;">PTF <input type="checkbox"/> 4</td> <td style="width:10%;">DEF <input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td>PTF <input type="checkbox"/> 2</td> <td>DEF <input type="checkbox"/> 2</td> <td>Incorporated <i>and</i> Principal Place of Business In Another State</td> <td>PTF <input type="checkbox"/> 5</td> <td>DEF <input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td>PTF <input type="checkbox"/> 3</td> <td>DEF <input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td>PTF <input type="checkbox"/> 6</td> <td>DEF <input type="checkbox"/> 6</td> </tr> </table>	Citizen of This State	PTF <input type="checkbox"/> 1	DEF <input type="checkbox"/> 1	Incorporated <i>or</i> Principal Place of Business In This State	PTF <input type="checkbox"/> 4	DEF <input type="checkbox"/> 4	Citizen of Another State	PTF <input type="checkbox"/> 2	DEF <input type="checkbox"/> 2	Incorporated <i>and</i> Principal Place of Business In Another State	PTF <input type="checkbox"/> 5	DEF <input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	PTF <input type="checkbox"/> 3	DEF <input type="checkbox"/> 3	Foreign Nation	PTF <input type="checkbox"/> 6	DEF <input type="checkbox"/> 6
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IV. NATURE OF SUIT (Place an "X" in One Box Only)					
CONTRACT	TORTS		FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury	PERSONAL INJURY <input type="checkbox"/> 362 Personal Injury - Med. Malpractice <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs. <input type="checkbox"/> 660 Occupational Safety/Health <input type="checkbox"/> 690 Other	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY	CIVIL RIGHTS	PRISONER PETITIONS	LABOR	IMMIGRATION	
<input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	<input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	<input type="checkbox"/> 510 Motions to Vacate Sentence Habeas Corpus: <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition	<input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act	<input type="checkbox"/> 462 Naturalization Application <input checked="" type="checkbox"/> 463 Habeas Corpus - Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	

V. ORIGIN (Place an "X" in One Box Only)

1 Original Proceeding
 2 Removed from State Court
 3 Remanded from Appellate Court
 4 Reinstated or Reopened
 5 Transferred from another district (specify)
 6 Multidistrict Litigation
 7 Appeal to District Judge from Magistrate Judgment

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):
28 USC 2243

Brief description of cause:
Petition for Writ of Habeas Corpus

VII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ _____ CHECK YES only if demanded in complaint:
JURY DEMAND: Yes No

VIII. RELATED CASE(S) IF ANY (See instructions): JUDGE _____ DOCKET NUMBER _____

DATE: 12/03/2025 SIGNATURE OF ATTORNEY OF RECORD: s/Grace Zaiman

FOR OFFICE USE ONLY

RECEIPT # _____ AMOUNT _____ APPLYING IFP _____ JUDGE _____ MAG. JUDGE _____