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**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF GEORGIA  
WAYCROSS DIVISION**

Cu Van Nguyen,

Petitioner,

v.

Tony Normand, *in his official capacity as  
Warden, Folkston ICE Processing Center,*

Respondent.

Case No. CV 525-208

**PETITION FOR A WRIT OF HABEAS  
CORPUS AND INJUNCTIVE RELIEF**

**INTRODUCTION**

1. This case challenges the unlawful re-detention of Cu Van Nguyen (“Petitioner” or “Mr. Nguyen”), who is currently in the custody of United States Immigration and Customs Enforcement (“ICE”), at the Folkston Immigration and Customs Enforcement (“ICE”) Processing Center.

2. On November 18, 2025, ICE detained Mr. Nguyen and transferred him to the custody of Tony Normand, Warden of the Folkston ICE Processing Center, without complying with the regulations governing his release on an Order of Supervision (“OSUP”). *See* 8 C.F.R. § 241.13(i).

3. Mr. Nguyen's removal to Vietnam is not reasonably foreseeable: ICE has not obtained a travel document from Vietnam and Vietnam has not agreed to accept Mr. Nguyen.

4. The punitive, unlawful detention of Mr. Nguyen violates the Due Process Clause of the Fifth Amendment of the U.S. Constitution, the Immigration and Nationality Act, 8 U.S.C. § 1231, implementing regulations, 8 C.F.R. § 241.4, 241.13. *See Zadvydas v. Davis*, 533 U.S. 678, 689-90, 121 S. Ct. 2491 (2001).

5. Mr. Nguyen respectfully requests this Court to issue an order directing Respondent to immediately release him from custody and restore him to the status he held prior to his re-detention, including the same conditions of his supervised release.

#### **PARTIES**

6. Petitioner, Mr. Cu Van Nguyen, has lived in the United States since November 9, 1994. Mr. Nguyen resided with his wife and minor children in Kill Devil Hills, North Carolina. He is currently detained in Folkston, Georgia.

7. Respondent, Tony Normand, is the Warden of the Folkston ICE Processing Center. In his official capacity, Warden Normand has custody of Mr. Nguyen at the behest and direction of United States Immigration and Customs Enforcement. Mr. Normand is sued in his official capacity.

#### **JURISDICTION AND VENUE**

8. This Court has subject matter jurisdiction under 28 U.S.C. § 2241, the Suspension Clause of the Constitution, and 28 U.S.C. § 1331 because this action arises under federal law, including the Immigration and Nationality Act, 8 U.S.C. § 1101, *et seq.*, and Administrative Procedure Act, 5 U.S.C. § 551, *et seq.*

9. Venue is proper in this district because Mr. Nguyen is in the custody of Respondent at the Folkston ICE Processing Center, which is located within this District.

**STATEMENT OF FACTS AND PROCEDURAL HISTORY**

**A. Petitioner: Cu Van Nguyen**

10. Mr. Nguyen was born in Vietnam in March 1980.

11. On November 9, 1984, Mr. Nguyen entered the United States with his mother and brother.

12. Mr. Nguyen's older sister had previously entered the United States through the humanitarian visa program under the Amerasian Homecoming Act and sponsored her family members, including Mr. Nguyen.

13. On August 26, 2009, an immigration judge in Atlanta, Georgia, ordered Mr. Nguyen removed to Vietnam due to his criminal history.

14. On October 26, 2009, ICE released Mr. Nguyen on an OSUP following the mandatory removal period at 8 U.S.C. § 1231(a)(6).

15. For the last sixteen years, Mr. Nguyen has reported to ICE for all requested appointments and check-ins.

16. He has no additional criminal violations or violations of the conditions on his release.

17. United States Citizenship and Immigration Services has granted Mr. Nguyen work authorization.

18. Mr. Nguyen is married to a United States citizen, and they have two United States citizen daughters.

19. Mr. Nguyen and his spouse own a small business and their home in North Carolina.

20. On November 18, 2025, ICE detained Mr. Nguyen at a check-in, without prior notice, and without revoking his OSUP.

21. ICE previously provided Mr. Nguyen with notice that the agency would offer him an opportunity to prepare for an orderly departure from the United States if Vietnam agreed to his return.

22. There are no circumstances indicating that Mr. Nguyen now poses a flight risk or danger to the community.

23. There is no evidence that Vietnam has issued a travel document or would accept Mr. Nguyen's repatriation.

24. Following his unannounced arrest, ICE transferred Mr. Nguyen to the Folkston ICE Processing Center in Folkston, Georgia.

25. There is no evidence that ICE had taken any measures to obtain a travel document from Vietnam.

#### **B. Repatriation To Vietnam**

26. Before a Vietnamese immigrant can be repatriated, the country must issue a passport or other travel documents in response to a request from ICE. *See Trinh v. Homan*, 466 F. Supp. 3d 1077, 1083 (C.D. Cal. 2020).

27. Between the end of the Vietnam War and 2008, Vietnam refused to repatriate any Vietnamese immigrant who had been ordered removed from the U.S. *See id.*

28. In 2008, Vietnam agreed to consider repatriation requests for Vietnamese immigrants who had arrived in the U.S. after July 12, 1995, but not those who arrived before July 12, 1995. *See id.*

29. Between 2017 and 2019, ICE requested travel documents for pre-1995 Vietnamese immigrants 251 times; Vietnam granted those requests only 18 times. *Id.* at 1087-88.

30. In November 2020, the U.S. and Vietnam signed a Memorandum of Understanding (“MOU”) that created a process for deporting pre-1995 immigrants.

31. Section 4 of the MOU obliges the U.S. and Vietnam to consider specific factors prior to deciding to remove a Vietnamese citizen, and prior to deciding to accept for repatriation a Vietnamese citizen.

32. These factors are not publicly known, because the U.S. government redacted them in Freedom of Information Act (“FOIA”) disclosures of the MOU; yet they appear to dictate which categories of people may be deported to Vietnam.

33. Under Section 8 of the MOU, if a person meets the designated criteria, ICE is expected to put together a documentation package for Vietnam to include, inter alia, a self-declaration form from the individual to be removed (using a form attached to the MOU), copies of identity and citizenship documents, and copies of the final order of removal and any criminal records.

34. Between September 2021 to September 2023, Vietnam issued travel documents to only four pre-1995 Vietnamese immigrants whom ICE sought to deport.

35. The process to secure a travel document for a pre-1995 immigrant is multilayered and lengthy, requiring interviews and verification by authorities in Vietnam. The only known change has been ICE’s policy and practice of deporting individuals to third countries.

### **LEGAL BACKGROUND**

#### **A. Due Process Governs Decisions to Revoke an Order of Supervision**

36. “The Due Process Clause applies to all persons within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent.” *Zadvydas*, 533 U.S. at 693.

37. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that Clause protects.” *Id.* at 690 (2001).

38. Under substantive due process doctrine, revocation of a noncitizen's order of supervision is a restraint on liberty that is permissible only if it serves a "legitimate nonpunitive objective." *Kansas v. Hendricks*, 521 U.S. 346, 363 (1997).

39. The Supreme Court has only recognized two legitimate objectives of immigration detention; preventing danger to the community or preventing flight prior to removal. *See Zadvydas*, 533 U.S. at 690-92 (discussing constitutional limitations on civil detention).

40. "Procedural due process imposes constraints on governmental decisions which deprive individuals of liberty," like the decision to revoke a non-citizen's order of supervision. *Mathews v. Eldridge*, 424 U.S. 319, 332 (1976) (citation modified). "The fundamental requirement of [procedural] due process is the opportunity to be heard at a meaningful time and in a meaningful manner." *Id.* at 333 (citation modified).

**B. Procedure for Revoking an Order of Supervision And Removal To Third Countries Without Due Process**

41. A noncitizen with a final order of removal "who is not removed within the [90-day] removal period . . . shall be subject to [an order of] supervision under regulations prescribed by the Attorney General." 8 U.S.C. § 1231(a)(3) (titled "Supervision after 90-day period").

42. A noncitizen may only be detained past the 90-day removal period following a removal order if found to be "a risk to the community or unlikely to comply with the order of removal" or if the order of removal was on specified grounds. *Id.* § 1231(a)(6).

43. But even where initial detention past the 90-day removal period is authorized, if "removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by [§ 1231(a)(6)]. In that case, of course, the alien's release may and should be conditioned on any of the various forms of supervised release that are appropriate in the circumstances . . ." *Zadvydas*, 533 U.S. at 699-700.

44. Regulations provide the following additional circumstances, beyond those listed at § 1231(a)(6), that allow for the revocation of an order of supervision and re-detention of a non: “(1) the purposes of release have been served; (2) the alien violates any condition of release; (3) it is appropriate to enforce a removal order . . . ; or (4) the conduct of the alien, or any other circumstance, indicates that release would no longer be appropriate.” 8 C.F.R. § 241.4(l)(2); *see also id.* § 241.13(i) (permitting revocation of an order of supervision only if a non-citizen “violates any of the conditions of release”).

45. Because “[r]egulations cannot circumvent the plain text of the statute[,]” these regulations are *ultra vires* of statutory authority. *See, e.g., You v. Nielsen*, 321 F. Supp. 3d 451, 463 (S.D.N.Y. 2018) (comparing regulations to 8 U.S.C. § 1231(a)(6), which authorizes detention past the removal period only if person is a risk to the community, unlikely to comply with the order of removal, or was ordered removed on specified grounds).

46. The governing regulations permit only certain officials to revoke an order of supervision: the ICE Executive Associate Director, a field office director, or an official “delegated the function or authority . . . for a particular geographic district, region, or area.” *Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 161 (W.D.N.Y. 2025) (citing 8 C.F.R. §§ 1.2, 241.4(l)(2) and explaining that the Homeland Security Act of 2002 renamed the position titles listed in § 241.4). If the field office director or a delegated official intends to revoke an order of supervision, they must first make findings that “revocation is in the public interest and circumstances do not reasonably permit referral of the case to the Executive Associate [Director].” 8 C.F.R. § 241.4(l)(2). For a delegated official to have authority to revoke an order of supervision, the delegation order must explicitly say so. *See Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 161 (finding a delegation order that “refers only to a limited set of powers under part 241 that do not

include the power to revoke release” insufficient to grant authority to revoke an order of supervision).

47. Upon revocation of an order of supervision, ICE must give a noncitizen notice of the reasons for revocation and a prompt interview to respond. 8 C.F.R. § 241.4(l)(1).

### **C. Removal To Third Countries Without Due Process**

48. To remove a foreign national to a third country, the INA requires that the Attorney General—by an through a delegate, such as an immigration judge—first determine that it is “impracticable, inadvisable, or impossible” to remove Petitioner to Vietnam and that the designated third country “will accept [Petitioner] into that country.” 8 U.S.C. § 1231(b)(2)(E)(vii); *see Himri v. Ashcroft*, 378 F.3d 932, 939 n. 4 (9th Cir. 2004) (8 U.S.C. § 1231(b)(E)(vii) “indisputably requires the Attorney General to prove that the proposed country of removal is willing to accept the alien”); *see also Jama v. Immigr. & Customs Enf’t*, 543 U.S. 335, 344 (2005).

49. The statute delegates the authority to the Attorney General, not DHS. 8 U.S.C. § 1231(b)(2)(E)(vii) (“the Attorney General shall remove the alien to. . .”); *see also* 8 C.F.R. § 1240.10(f) (in removal proceedings the immigration judge “shall. . . identify for the record a country, or countries in the alternative, to which the alien’s removal may be made”).

50. To remove a foreign national to a third country, the Attorney General would need to move to reopen removal proceedings to designate a third country for removal under the statutory process. *See, e.g., Sadychov v. Holder*, 565 F. App’x 648, 651 (9th Cir. 2014) (unpublished) (holding that should a new country of removal be designated, “the agency must provide [the noncitizen] with notice and an opportunity to reopen his case for full adjudication of his claim of withholding of removal from” the third country); *Aden v. Nielsen*, 409 F. Supp. 3d

998, 1009, 1011 (W.D. Wash. 2019) (finding that removal proceedings “shall be reopened and a hearing shall be held before the immigration judge so that petitioner may apply for relief from removal” as to a country not designated in prior proceedings).

51. Adherence to that process is necessary to ensure the foreign national has a statutory right to claim protection in immigration court against removal to a third country where he may be persecuted or tortured, a form of protection known as withholding of removal, 8 U.S.C. § 1231(b)(3)(A); *see also* 8 C.F.R. §§ 208.16, 1208.16, as well as his right to claim deferral of removal under CAT. *See* 28 C.F.R. § 200.1 (“A removal order. . . shall not be executed in circumstances that would violate [the CAT]”); 8 C.F.R. §§ 208.17-18, 1208.17-1208.18.

52. At a minimum, Due Process guarantees the noncitizen meaningful notice of the third country designated for removal and an opportunity to respond. *See D.V.D.*, 145 S. Ct. at 2163 (Sotomayor, J., dissenting) (“[t]he Fifth Amendment unambiguously guarantees that right” to notice of a third country removal so that a noncitizen “learn[s] about it in time to seek an immigration judge’s review”). Notice cannot be “last minute” because that would deprive an individual of a meaningful opportunity to apply for fear-based protection from removal. *Andriasian v. INS*, 180 F.3d 1033, 1041 (9th Cir. 1999).

53. Individuals must have time to prepare and present relevant arguments and evidence, and to seek reopening of their removal case. “[W]ritten notice of the country being designated” is required and “the statutory basis for the designation, i.e., the applicable subsection of § 1231(b)(2)” must be specified. *Aden*, 409 F. Supp. 3d at 1019; *see also D.V.D. v. U.S. Dep’t of Homeland Sec.*, No. 25-cv-10676-BEM, 2025 WL 1453640, at \*1 (D. Mass. May 21, 2025) (“All removals to third countries, *i.e.*, removal to a country other than the country or countries designated during immigration proceedings as the country of removal on the non-citizen’s order

of removal, must be preceded by written notice to both the non-citizen and the non-citizen's counsel in a language the non-citizen can understand." (internal citation omitted)); *Andriasian*, 180 F.3d at 1041 (due process requires notice to the noncitizen of the right to apply for asylum and withholding to the country where they will be removed).

54. Due process also demands that the government "ask the noncitizen whether he or she fears persecution or harm upon removal to the designated country and memorialize in writing the noncitizen's response. This requirement ensures DHS will obtain the necessary information from the noncitizen to comply with § 1231(b)(3) and avoids [a dispute about what the officer and noncitizen said]." *Aden*, 409 F. Supp. 3d at 1019.

55. Any unannounced attempt at a third country removal would violate these statutory and constitutional procedural protections.

56. According to ICE's memo issued July 9th, individuals can be removed to third countries "without the need for further procedures," so long as "the [U.S.] has received diplomatic assurances."

57. The policy instructs officers to violate their statutory and constitutional obligations to noncitizens.

58. The same is true of the minimal procedures ICE offers when no diplomatic assurances are present that a noncitizen will not be tortured upon arrival in a third country.

59. The policy provides no meaningful notice (6-24 hours), instructs officers *not* to ask about fear, and provides no actual opportunity for noncitizens to seek counsel and prepare a fear-based claim (6-24 hours), let alone reopen removal proceedings.

60. In sum, the policy directs ICE officers to violate the rights of noncitizens whom they seek to subject to the third country removal program.

61. Several courts have recently ordered the government not to remove a noncitizen to a third countries under similar circumstances. *See generally J.R. v. Bostock*, 25-cv-01161-JNW, 2025 WL 1810210 (W.D. Wash. Jun. 30, 2025) (immediately enjoining removal to “Cuba, Libya, or any third country in the world absent prior approval from this Court”); *Phan*, 2025 WL 1993735, at \*7 (enjoining Respondents from “re-detaining or removing Petitioner to a third country without notice and an opportunity to be heard”); *Hoac*, 2025 WL 1993771, at \*7 (same); *Vaskanyan v. Janecka*, 25-cv-01475-MRA-AS, 2025 WL 2014208 (C.D. Cal. Jun. 25, 2025); *Ortega v. Kaiser*, 25-cv-05259-JST, 2025 WL 1771438 (N.D. Cal. June 26, 2025).

#### **D. The APA Sets Minimum Standards for Final Agency Action**

62. The Administrative Procedure Act authorizes judicial review of final agency action. 5 U.S.C. § 704.

63. Final agency actions are those (1) that “mark the consummation of the agency’s decision making process[,]” and (2) “by which rights or obligations have been determined, or from which legal consequences will flow.” *Bennett v. Spear*, 520 U.S. 154, 178 (1997) (citation modified).

64. ICE’s decision to re-detain Mr. Nguyen, without revoking his OSUP and without written notice, is a final agency action subject to this Court’s review.

65. Here, Mr. Nguyen’s re-detention marked the consummation of ICE’s decision making process regarding Mr. Nguyen’s custody.

66. Mr. Nguyen’s re-detention was an action by which rights or obligations have been determined or from which legal consequences flowed, as ICE detained Mr. Nguyen in violation of his rights under the Constitution, statute, and regulations.

#### **E. Agencies Must Follow Lawful Rules And Policy**

67. Under the *Accardi* doctrine, a foundational principle of administrative law, agencies must follow their own procedures, rules, and instructions. See *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260, 268 (1954) (setting aside an order of deportation where the Board of Immigration Appeals failed to follow procedures governing deportation proceedings); see also *Morton v. Ruiz*, 415 U.S. 199, 235 (1974) (“Where the rights of individuals are affected, it is incumbent upon agencies to follow their own procedures . . . even where the internal procedures are possibly more rigorous than otherwise would be required.”).

68. Where a release notification issued alongside an order of supervision instructs that a noncitizen with a final order of removal will be given an opportunity to prepare for an “orderly departure,” ICE’s failure to follow that instruction is an *Accardi* violation. See *Ceesay*, 781 F. Supp. 3d at 169; *Ragbir v. Sessions*, 2018 WL 623557 (S.D.N.Y. Jan. 29, 2018), *vacated and remanded on other grounds sub nom. Ragbir v. Barr*, 2019 WL 6826008 (2d Cir. July 30, 2019); *Rombot v. Souza*, 296 F. Supp. 3d 383 (D. Mass. 2017) (ordering release of petitioners to give an opportunity to prepare for orderly departure).

69. Many district courts have confronted the same question presented here -- that is, whether ICE’s violation of the procedural requirements set forth in § 241.13 may be overlooked in a habeas action challenging the legality of a noncitizen’s detention -- and concluded that habeas relief was warranted. See, e.g., *Phan v. Noem*, 2025 WL 2898977, \*5 (S.D. Cal. 2025) (“The Court’s research indicates that every district court, except one, to consider the issue has determined that where ICE fails to follow its own regulations in revoking release, the detention is unlawful, and the petitioner’s release must be ordered. This Court reaches the same conclusion. ICE’s failure to comply with both 8 C.F.R. § 241.4 and 8 C.F.R. § 241.13 violated Petitioner’s due process rights.”); *Nguyen v. Archambeault*, 2025 WL 3250922, \*1-2 (D. Ariz. 2025)

(“Respondents implicitly acknowledge their noncompliance with the regulation that required ICE to provide notice and conduct the informal interview promptly after Petitioner’s redetention. That requirement is not an abstract procedural technicality . . . . Respondents’ failure to comply with the governing regulation is prejudicial in that, if the regulation had been followed, Petitioner would have had a meaningful timely opportunity to no longer be detained. The delay of over four months deprived Petitioner of the opportunity to challenge the reasons for his redetention. Petitioner’s immediate release is required to return him to the status quo ante—the last uncontested status which preceded the pending controversy. This decision is in accord with myriad other district courts to address this issue.”) (citations omitted); *accord ee also Grigorian v. Bondi*, 2025 WL 2604573, \*9-10 (S.D. Fla. 2025).

**CLAIMS FOR RELIEF**

**Count One**

**Violation of the Fifth Amendment of the U.S. Constitution  
Substantive Due Process**

70. Petitioner realleges all paragraphs above as if fully set forth here.
71. The Due Process Clause of the Fifth Amendment protects against punitive detention and similar restrictions on a person’s liberty.
72. On October 26, 2009, ICE released Mr. Nguyen on an OSUP.
73. For the past sixteen years, Mr. Nguyen has complied with all terms and conditions of his OSUP.
74. No change in circumstances warranted Mr. Nguyen’s re-detention on November 18, 2025.
75. Mr. Nguyen’s arrest and re-detention, therefore, did not bear a reasonable relationship to the two recognized purposes of immigration detention: preventing danger to the community, or flight prior to removal.

76. Because ICE had no legitimate, non-punitive objective in revoking Mr. Nguyen's order of supervision, his re-detention violates substantive due process under the Fifth Amendment of the U.S. Constitution.

**Count Two**  
**Violation of the Fifth Amendment of the U.S. Constitution**  
**Procedural Due Process**

77. Petitioner realleges all paragraphs above as if fully set forth here.

78. The Supreme Court's decision in *Mathews*, 424 U.S. at 333, instructs courts to balance three factors to determine whether procedural due process is satisfied: (1) the private interest at issue; (2) the risk of erroneous deprivation of that interest through the procedures used, and the probable value, if any, of additional procedural safeguards; and (3) the government's interest, including fiscal and administrative burdens that additional or substitute procedural requirements entail.

79. All three factors demonstrate ICE violated Mr. Nguyen's rights to due process.

80. The first factor, the private interest at issue, favors Mr. Nguyen. "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 [of the Fifth Amendment] protects." *Zadvydas*, 533 U.S. at 690.

81. The second factor, the risk of erroneous deprivation of liberty and the probable value of procedural safeguards, favors Mr. Nguyen.

82. To safeguard against erroneous deprivations of liberty, the statute specifies the limited number of reasons that an order of supervision can be revoked. Regulations specify who may lawfully revoke the order, and the procedures that must be followed when doing so, including giving notice and an opportunity to be heard. 8 U.S.C. § 1231(a)(6); 8 C.F.R. § 241.13(i).

83. Here, ICE detained Mr. Nguyen in violation his procedural due process protections under the statute, regulations, and the Fifth Amendment. The failure to follow the requisite regulations and procedural safeguards has led to the deprivation of Mr. Nguyen's liberty by Respondent.

84. When the government ignores law that ensures notice and an opportunity to respond to a person at risk of revocation of an order of supervision, it is more likely to waste limited financial and administrative resources on unnecessary detention of people who are neither flight risks nor dangerous to the community, as is the case with Mr. Nguyen.

85. The re-detention of Mr. Nguyen, prior to the revocation of his OSUP and without providing him requisite notice and a meaningful opportunity to respond in compliance with the regulations, violated his procedural due process rights under the Fifth Amendment of the U.S. Constitution.

**Count Three  
Detention In Violation of Law**

86. Petitioner realleges all paragraphs above as if fully set forth here.

87. Under the APA, a court shall "hold unlawful and set aside agency action . . . found to be . . . not in accordance with law" or "contrary to constitutional right, power, privilege, or immunity." 5 U.S.C. § 706(2)(A), (B).

88. The APA's reference to "law" in the phrase "not in accordance with law," "means, of course, *any* law, and not merely those laws that the agency itself is charged with administering." *FCC v. NextWave Pers. Commc'ns Inc.*, 537 U.S. 293, 300 (2003) (emphasis in original).

89. ICE failed to comply with both 8 C.F.R. § 241.4 and 8 C.F.R. § 241.13 at the time of Mr. Nguyen's re-detention.

90. ICE never revoked Mr. Nguyen's OSUP prior to taking him into custody nor provided him with the requisite notice at the time of his detention.

91. ICE's re-detention of Mr. Nguyen and transfer to Respondent's custody violated the governing regulations.

92. ICE's decision to arrest, re-detain, and transfer Mr. Nguyen into Respondent's custody was not made in accordance with law and procedure, and thus Respondent must release him from custody.

**PRAYER FOR RELIEF**

WHEREFORE, Petitioner requests that this Court:

- A. Exercise jurisdiction over this matter;
- B. Enjoin Petitioner's removal or transfer outside the jurisdiction of this Court and the United States pending its adjudication of this petition;
- C. Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment, the INA and implementing regulations, the APA, and the *Accardi* doctrine;
- D. Order Petitioner's immediate release;
- E. Award Petitioner costs and reasonable attorney's fees; and
- F. Grant such other relief as this Court may deem just and proper.

December 5, 2025

Respectfully Submitted,

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Forthcoming

Attorneys for Petitioner

**28 U.S.C. § 2242 VERIFICATION STATEMENT**

I am submitting this verification on behalf of the Petitioner because I am the Petitioner's attorney. On the basis of documents, discussions with Petitioner's immigration counsel, and Petitioner's family, I hereby verify that the statements made in this Petition and Complaint are true and correct to the best of my knowledge.

/s/ Jesse M. Bless

Jesse M. Bless

Bless Litigation LLC