



## **INTRODUCTION**

1. Petitioner Abdellah Jbala (A# [REDACTED]) is a 32-year-old citizen of Morocco who voluntarily surrendered to U.S. Customs and Border Protection ("CBP") at Eagle Pass, Texas on May 27, 2025, seeking asylum protection under United States law.
2. Petitioner has been detained at the South Texas ICE Processing Center ("STIPC"), located at 566 Veteran Dr., Pearsall, TX 78061, since June 24, 2025, despite passing his Credible Fear Interview on October 3, 2025, without meaningful custody review.
3. On September 18, 2025, Petitioner was violently assaulted inside STIPC by another detainee using an unknown sharp object above the left eyebrow, requiring medical treatment.
4. ICE refused to provide Petitioner with necessary grievance documentation, obstructing proper reporting.
5. Petitioner has no criminal history other than a misdemeanor illegal-entry offense for which he already served 20 days.
6. Detention is unlawful because it is prolonged, punitive, medically dangerous, and unrelated to appearance or danger considerations.

## **JURISDICTION**

7. This Court has jurisdiction under 28 U.S.C. §§ 2241 and 1331.

## **VENUE**

8. Venue is proper because Petitioner is detained in Pearsall, Texas.

## **FACTUAL BACKGROUND**

9. Petitioner surrendered at Eagle Pass on May 27, 2025.
10. He has remained detained at STIPC, address: South Texas ICE Processing Center, 566 Veteran Dr., Pearsall, TX 78061.
11. ICE delayed his Credible Fear Interview for 88 days.
12. Petitioner suffered a violent assault on September 18, 2025.
13. ICE did not provide proper grievance documentation.

14. Dormitory conditions remain unsafe due to overcrowding and mixed religious groups.
15. Immigration Judge refused to grant bond.
16. Upon release, Petitioner intends to reside in Dallas, Texas.

**CLAIMS FOR RELIEF**

COUNT I – Violation of the Immigration and Nationality Act (INA).

COUNT II – Arbitrary and Capricious Action under the APA.

COUNT III – Procedural Due Process Violation.

COUNT IV – Substantive Due Process Violation.

COUNT V – Unsafe Conditions of Confinement.

COUNT VI – Deliberate Indifference to Medical Needs.

**PRAYER FOR RELIEF**

Petitioner respectfully requests:

- a. Jurisdictional assumption;
- b. Non-transfer order;
- c. Order to Show Cause within three days;
- d. Immediate release or custody hearing;
- e. Declaration of unlawful detention;
- f. Additional relief as appropriate.

**VERIFICATION**

I, ABDELLAH JBALA, A#  declare under penalty of perjury that the statements in this Petition are true and correct.

Executed on December 7, 2025, at Pearsall, Texas.

/s/ ABDELLAH JBALA

ABDELLAH JBALA

Detained at:

South Texas ICE Processing Center

566 Veteran Dr.

Pearsall, TX 78061

**PROOF OF SERVICE**

I, ABDELLAH JBALA, A# [REDACTED], certify that on December 8, 2025, I served a true and correct copy of this Petition by U.S. Mail upon the following:

- U.S. Attorney's Office for the Western District of Texas
- ICE Office of the Principal Legal Advisor (OPLA), San Antonio

/s/ ABDELLAH JBALA

ABDELLAH JBALA