

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MIDDLE PENNSYLVANIA**

Mohamed Saed Bouh Cheikh Mohamed Vadel,

**Petitioner,**

v.

**Craig A. Lowe**

**in his official capacity as Warden of Pike County  
Correctional Facility;**

**Patrick Maddas,**

**in his official capacity as Acting Pennsylvania Field Office  
Director, U.S. Immigration & Customs Enforcement;**

**Kristi Noem,**

**in her official capacity as Secretary, U.S. Department of  
Homeland Security;**

**Todd M. Lyons,**

**in his official capacity as Acting Director of Immigration  
& Customs Enforcement; and**

**Pamela Bondi,**

**in her official capacity as Attorney General, U.S.  
Department of Justice,  
Respondents.**

Civil Docket No.

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

## **I. Preliminary Statement**


Petitioner Mohamed Saed Bouh Cheikh Mohamed Vadel, by and through undersigned counsel, respectfully petitions this Honorable Court for a writ of habeas corpus under 28 U.S.C. § 2241. Petitioner is currently being detained by U.S. Immigration and Customs Enforcement (“ICE”) at Pike County Correctional Facility in Pennsylvania. He challenges the lawfulness of his detention on the grounds that he is not subject to mandatory detention and was previously released on his own recognizance, yet ICE re-detained him without any new justification during a routine check-in on October 6, 2025. Petitioner contends that his continued custody is not authorized by law and violates his rights under the Immigration and Nationality Act (“INA”) and the Due Process Clause of the Fifth Amendment to the U.S. Constitution. He seeks immediate release or, at a minimum, an individualized bond hearing to determine the legality of his detention.

## **I. JURISDICTIONAL STATEMENT**

1. This Court has subject matter jurisdiction over this petition pursuant to 28 U.S.C. § 2241, as Petitioner is “in custody in violation of the Constitution or laws or treaties of the United States” . Federal district courts retain habeas corpus jurisdiction to review the lawfulness of immigration detention even during ongoing removal proceedings . Petitioner’s claim does not challenge any final order of removal, but solely the authority and legality of his current detention. Accordingly, the jurisdiction-stripping provisions of INA § 242, 8 U.S.C. § 1252, do not apply to this pure detention challenge (habeas review of detention is not precluded by 8 U.S.C. § 1252).
2. Venue is proper in the Middle District of Pennsylvania because Petitioner is detained at Pike County Correctional Facility, located in Pike County, Pennsylvania . Pike County lies within the Middle District of Pennsylvania, and thus this Court is the proper venue to adjudicate this habeas petition.
3. To the extent any exhaustion of remedies is applicable, Petitioner has exhausted any available administrative remedies or such exhaustion should be excused as futile. There is no administrative mechanism to promptly challenge the legality of ICE’s decision to detain Petitioner aside from the immigration court bond process, which either is unavailable or inadequate in this case. In any event, exhaustion in immigration habeas matters is a

prudential, not jurisdictional, requirement, and Petitioner respectfully submits that this Court should reach the merits given the urgent liberty interests at stake.

## II. PARTIES

- Petitioner, Mohamed Saed Bouh Cheikh Mohamed Vadel, is a 28-year-old native and citizen of Mauritania. He entered the United States on or about September 17, 2023, and was found to have a credible fear of persecution. He was placed in removal proceedings under INA § 240 and was living in New York City while pursuing his asylum claim. Petitioner is currently in ICE custody at Pike County Correctional Facility, Lords Valley, PA (A# ). He has been detained since October 6, 2025.
- Respondent, Craig A. Lowe, Warden of Pike County Correctional Facility, is Petitioner's immediate custodian and is named in his official capacity as the person with day-to-day control over Petitioner's detention.
- Respondent, Patrick Maddas, Field Office Director, ICE Enforcement and Removal Operations, Philadelphia Field Office, is named in his official capacity as the ICE official responsible for Petitioner's detention and enforcement of immigration laws in this region.

- **Additional Respondents:** To the extent necessary, Petitioner also names the U.S. Department of Homeland Security (“DHS”) Secretary and the Assistant Field Office Director of Pike County ICE Detention in their official capacities, as they have legal authority over custody decisions. Petitioner notes, however, that pursuant to *Rumsfeld v. Padilla*, 542 U.S. 426 (2004), the proper respondent in a habeas corpus action is generally the immediate custodian. Thus, the Warden is the primary Respondent, and the inclusion of other officials is in the alternative and to ensure complete relief.

### **III. FACTUAL BACKGROUND**

1. Petitioner entered the United States without inspection on September 17, 2023, seeking refuge from persecution in Mauritania. After passing a credible fear interview, he was placed in removal proceedings by DHS. On September 19, 2023, ICE exercised its discretion under INA § 236(a), releasing Petitioner on his own recognizance (ROR) pending the outcome of his immigration case. An Order of Release on Recognizance (Form I-220A) was issued to Petitioner on that date, setting forth conditions of release, including that Petitioner attend all immigration hearings, report to ICE as directed, not violate any laws, and keep his address updated. Petitioner signed an acknowledgment of these conditions on September 19, 2023. He

was not required to post bond, and no bond amount was set, indicating that the government considered him an appropriate candidate for conditional release.

2. Petitioner fully complied with all conditions of his release. He provided ICE with his residential address in New York and updated contact information. He timely appeared for all scheduled check-ins with ICE and attended his immigration court hearings as required. There is no allegation that Petitioner ever violated any release condition. Notably, Petitioner's appearance at the very check-in where he was detained (described below) demonstrates his willingness to comply with DHS's reporting requirements. Prior to October 2025, Petitioner was never arrested for any crime or otherwise in violation of law; he has no criminal record and has been pursuing lawful avenues of relief through the immigration court.
3. Pending Petitioner has applied for asylum, withholding of removal, and protection under the Convention Against Torture due to persecution he fears in Mauritania. His immigration case was initially venued at the New York Immigration Court, and a master calendar hearing was scheduled for April 24, 2024, and was awaiting a merits hearing, which was scheduled for February 1, 2026 after his detention. Petitioner, through counsel, has been actively pursuing his case. In late 2025, after being taken into ICE custody,

his case was transferred to the Elizabeth Immigration Court (New Jersey) on the detained docket. Petitioner re-filed a Form I-589 Application for Asylum and Withholding of Removal, which was accepted by the immigration court on or around November 10, 2025 (through counsel Kareem El Nemr). As of the date of this petition, Petitioner's application for relief remains pending, and he has a future individual hearing scheduled (or to be scheduled) on his claims. Thus, Petitioner's removal proceedings are ongoing, and he has a colorable claim for relief from removal.

4. On October 6, 2025, Petitioner appeared in person for a routine check-in at the ICE ERO office (at 26 Federal Plaza, New York, NY, as directed).

Without warning, ICE officers abruptly informed Petitioner that his release was being revoked and took him into custody. This took place two years after he had been living in the community on ROR. Petitioner was not given a clear explanation for this decision, other than a general statement that he would be detained pending the resolution of his case. There was no allegation that Petitioner had failed to comply with supervision conditions or that he had become a danger or flight risk; in fact, the very act of appearing for his check-in evidences his continued compliance and lack of flight risk. ICE proceeded to transport Petitioner to Pike County Correctional Facility in Lords Valley, Pennsylvania, where immigration detainees are held under

ICE contract. Petitioner has remained detained at Pike County Correctional Facility continuously from October 6, 2025 to the present.

5. Since being detained on October 6, 2025, Petitioner has not been afforded any opportunity for a bond hearing or other neutral review of ICE's custody decision. Petitioner did not receive any initial bond determination from an immigration judge after his re-detention. Upon information and belief, ICE did not set any bond amount at the time of detention (effectively treating him as no bond), despite the fact that Petitioner is not subject to the mandatory detention statute. Although noncitizens detained under 8 U.S.C. § 1226(a) are entitled to seek a custody redetermination hearing before an Immigration Judge, in practice Petitioner's case has been focused on the merits of his asylum application and the immigration court has not yet addressed custody status. Given that ICE itself initially released Petitioner on recognizance, the decision to now hold him without bond or hearing is perplexing and unjustified.
6. Petitioner's sudden and indefinite detention has caused him significant hardship. He has been separated from his community and support network in New York. His continued detention has caused substantial harm to the two families that depended on his care as a home health attendant, especially as he had worked for the Abrahamsen family for over a year prior to his

detention. Mr. Abrahamsen has stated that “He is like a member to our family. We are so worried about Mohamed”. The Savitsky family is also severely impacted; Mrs. Savitsky states in her letter that “losing him, even temporarily, has already created a serious strain on Jacob’s care and emotional stability.” As such, both families who relied on him have been profoundly impacted by his sudden and unexpected absence and have requested his release.

Additionally, his detention has imposed serious emotional and practical hardships on his own family, as he was also providing for his mother in Mauritania. Both he and his family are suffering due to his prolonged detention. He has limited access to family, evidence, and legal resources. Petitioner has also experienced stress, anxiety, and deteriorating mental health due to the uncertainty of his confinement. Furthermore, he is unable to adequately prepare his asylum case while incarcerated. These hardships underscore the urgent need for judicial relief, as Petitioner’s detention is not serving any legitimate purpose given his previously demonstrated compliance and the availability of less restrictive means, such as continued supervision, to ensure his appearance at proceedings.

In summary, Petitioner was a law-abiding asylum seeker who complied with all conditions of release, yet he now finds himself behind bars without any individualized determination that he poses a risk. The only thing that changed on October 6, 2025 was ICE's decision to revoke his release, a decision made without transparency, process, or apparent reason. Petitioner now turns to the Court to vindicate his rights and order his release from this unlawful detention.

#### **IV. Legal Framework**

Authority to Detain or Release under INA § 236: The Attorney General (through DHS/ICE) has authority under INA § 236(a), 8 U.S.C. § 1226(a), to arrest and detain an alien pending removal proceedings. Importantly, § 1226(a) also authorizes DHS to release such an individual on bond or conditional parole. The statute provides, in pertinent part:

“On a warrant issued by the Attorney General, an alien may be arrested and detained pending a decision on whether the alien is to be removed from the United States. Except as provided in [INA § 236(c)], the Attorney General may release the alien on bond ... or conditional parole.” 8 U.S.C. § 1226(a) (emphasis added).

The exception in § 1226(c) refers to certain categories of noncitizens who have committed specified offenses (such as aggravated felonies, crimes of moral turpitude, terrorist activities, etc.) and are therefore subject to mandatory detention without bond during their removal proceedings. In those limited cases, DHS must detain the individual under 8 U.S.C. § 1226(c) and release is not permitted (except in narrow circumstances like witness protection). The U.S. Supreme Court upheld the constitutionality of this mandatory detention in *Demore v. Kim*, 538 U.S. 510 (2003), but emphasized that such detention is typically of short duration and related to fast-track removal proceedings for deportable criminal aliens .

For individuals not subject to § 1226(c), the default rule of § 1226(a) applies: detention is discretionary, and the government may continue to detain or may release on bond or recognizance. Federal regulations explicitly provide that “*any person*” detained under § 1226(a) may request a custody redetermination (bond hearing) by an immigration judge. See 8 C.F.R. § 1236.1(d)(1) (immigration judge may redetermine the conditions of custody set by DHS for aliens detained under § 1226(a)). At such a hearing, the immigration judge has authority to set a bond (or order release on recognizance) if the judge finds the person is not a flight risk or danger. By contrast, if the person is properly classified under § 1226(c), the immigration judge lacks jurisdiction to offer bond.

In addition to statutory authority, the Due Process Clause of the Fifth Amendment constrains civil immigration detention. Because civil detention is non-punitive, it is permitted only to the extent that it serves valid regulatory purposes, principally preventing flight and protecting public safety during the removal process .

Detention that is arbitrary, capricious, or unjustified by these purposes violates due process. As the Supreme Court has observed, “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 v. Davis*, 533 U.S. 678, 690 (2001) (internal quotation marks omitted). The Court further cautioned that “government detention violates that Clause unless the detention is ordered in a certain special and narrow circumstance, and even then only with adequate procedural protections.” *Id.* In other words, civil detention is constitutionally permissible only in exceptional cases where it is carefully limited and justified by strong special circumstances and accompanied by appropriate procedures to ensure it remains necessary . In the immigration context, those special circumstances include preventing flight risk or danger to the community, and even then detention should last no longer than reasonably necessary to achieve those goals .

The Third Circuit has been at the forefront of articulating due process limits on immigration detention. In *Diop v. ICE/Homeland Security*, the court held that § 1226(c) mandatory detention, while constitutional at the outset, “contains an implicit limitation of reasonableness” such that prolonged detention without a bond hearing will eventually violate due process (even if the statute is silent on time limits) . Subsequent decisions, such as *Chavez-Alvarez v. Warden York Cnty. Prison*, reinforced that principle, finding that detention “becomes constitutionally suspect once it continues for a prolonged period without meaningful review.” 783 F.3d 469, 474–78 (3d Cir. 2015). In *Chavez-Alvarez*, a lawful permanent resident held under § 1226(c) was granted habeas relief after about one year of detention; the Third Circuit ruled that “beginning sometime after the six-month timeframe considered by the Supreme Court in *Demore*, the burdens to [the petitioner’s] liberties outweighed any justification for using presumptions to detain him without bond” and thus an individualized bond hearing was required . More recently, in *German Santos v. Warden Pike Cnty. Corr. Facility*, 965 F.3d 203 (3d Cir. 2020), the Third Circuit affirmed that the due process principles from *Diop* and *Chavez-Alvarez* remain good law even after the Supreme Court’s decision in *Jennings v. Rodriguez*, 138 S. Ct. 830 (2018) . *German Santos* clarified that *Jennings* addressed only the statutory interpretation of detention provisions, not the constitutional limitations, and therefore courts in this Circuit must still assess

whether detention without a bond hearing has become unreasonable in duration or execution. 965 F.3d at 208–10. The common thread in these cases is that the government cannot detain a person indefinitely or arbitrarily without proving that such detention remains justified.

Although the above precedents often involve mandatory detention cases, the overarching due process concerns apply a fortiori to discretionary detention under § 1226(a). If due process requires a timely bond hearing and individualized justification for those who Congress mandated to detain, then certainly those whom Congress allowed to be free on bond or supervision should not be locked up absent a demonstrated necessity. In short, ICE’s authority to detain under § 1226(a) is not unfettered – it must be exercised consistently with the statute’s purpose (ensuring appearance and public safety) and the Constitution’s demands of fundamental fairness.

With this legal framework in mind, Petitioner asserts that his current detention is unlawful for multiple reasons: (1) he is not within any category that Congress has mandated for detention, and ICE’s discretionary decision to detain him now – after

previously releasing him – is an unjustified abuse of discretion under the INA; and (2) the deprivation of Petitioner’s liberty, without any individualized hearing or new evidence of risk, is so arbitrary and unwarranted that it violates due process. Petitioner will address each point in turn.

## **Argument**

### **I. Petitioner Is Not Subject to Mandatory Detention and DHS’s Authority to Detain Him Is Conditioned on an Individualized Determination of Flight Risk or Danger**

Petitioner’s threshold contention is that his detention is ultra vires (beyond statutory authority) because he does not fall under the mandatory detention provision of the INA. The government may seek to justify Petitioner’s custody under INA § 236(c), but any such argument would be legally erroneous. Petitioner has no criminal record and is not alleged to be a terrorist or security risk. He is charged only with removability under INA § 212(a)(6)(A)(i) for being present without admission, which is not an offense that triggers § 236(c). Indeed, DHS’s own conduct confirms this: they exercised discretion to release Petitioner on

recognizance in 2023, something categorically barred if § 236(c) applied. Thus, as a matter of law, Petitioner's detention must be pursuant to INA § 236(a), which explicitly permits release on bond or recognizance.

Under § 236(a), ICE always retained the discretion to detain or release Petitioner. However, that discretion is not limitless—it must be exercised consistently with the statute's purpose and the Constitution. Initially, ICE made the reasonable determination that Petitioner's detention was unnecessary, as evidenced by the ROR order. By reversing course two years later without any change in circumstances, ICE acted in an arbitrary manner inconsistent with the INA's scheme. The statute's design is to allow release in appropriate cases; once an individual has been found eligible for release and has demonstrated continued compliance, the continued authority to detain must be predicated on some rationale (such as new evidence of risk or a violation of conditions). Otherwise, DHS could nullify the statutory distinction between § 236(a) and § 236(c) by effectively treating discretionary detainees as if they were mandatory ones.

Courts have recognized that detention power under § 1226(a) must be coupled with procedural safeguards, such as bond hearings, to ensure that the decision to detain is warranted. For example, in *Guerra v. Shanahan*, 831 F.3d 59, 61–62 (2d Cir. 2016), the Second Circuit noted that aliens detained under § 1226(a) are entitled to bond hearings where the government bears the burden to justify continued detention by showing the person is a flight risk or danger. While *Guerra* is not binding on this Court, the principle is instructive: where detention is discretionary, it should be the result of an individualized assessment, not automatic or unexamined incarceration. Here, Petitioner received no individualized assessment at all when he was re-detained. ICE did not articulate any reasons—on the record or to Petitioner—for revoking his release. There is no evidence of a bond hearing being offered or of any officer considering alternatives to detention. This lack of process and rationale strongly suggests that Petitioner’s detention is not an authorized or proper exercise of § 236(a) authority, but rather an arbitrary action.

Furthermore, to the extent ICE’s decision was based on the mere fact that Petitioner’s removal might be forthcoming (since his asylum case was due to be heard), that is not a legally sufficient reason to detain someone who had faithfully complied for two years. The INA’s framework already accounts for ensuring

removal: if Petitioner ultimately loses his case, DHS can remove him then; interim detention is not a prerequisite to removal unless there is some specific reason to suspect he would abscond or pose a danger. Petitioner's history of compliance and intent to pursue relief actually indicate the contrary – he has every incentive to continue appearing to seek lawful status. Therefore, DHS lacked a valid statutory basis to incarcerate Petitioner when less restrictive means (his existing supervision) were working effectively.

## **II. Petitioner's Continued Detention Violates the Due Process Clause Because It Is Arbitrary, Punitive, and Not Narrowly Tailored to Serve a Legitimate Government Interest**

Even if this Court finds that DHS had the statutory authority to arrest Petitioner under § 1226(a), the manner in which that authority has been exercised in this case violates due process. The Fifth Amendment's Due Process Clause forbids the government from depriving an individual of liberty in a capricious or unjustified manner. Civil detention must bear a reasonable relation to its purposes and must be accompanied by adequate procedural safeguards to ensure that it remains justified

over time . Petitioner’s detention fails both aspects of this test: it is unreasonable and unjustified on its face, and the lack of any hearing or process to review the need for detention is fundamentally unfair.

1. No Legitimate Purpose for Detention: The only permissible purposes for immigration detention during proceedings are preventing flight and protecting the community from danger . Petitioner does not fit either category. He has no criminal history and no record of violence; nothing in his background suggests he poses a danger to society. Nor is he a flight risk – he proved this by diligently attending check-ins and court dates for two years. In *Zadvydas*, the Supreme Court explained that if removal is not reasonably foreseeable, continued detention is not allowed because it no longer serves its purpose . Here, Petitioner’s removal is not imminent (his asylum case is pending and could result in relief or appeals), and meanwhile, detention is not serving any enhanced compliance purpose that couldn’t be met through less restrictive means. The Third Circuit’s decisions underscore that detention becomes unconstitutional when its justifications wane. See, e.g., *Chavez-Alvarez*, 783 F.3d at 474 (“[T]he Government’s goals of ensuring appearance at hearings and preventing danger to the community will not forever justify continued detention as the period of detention grows.”). In Petitioner’s case, from day one of

re-detention, there was scant justification, given his track record. Thus, his incarceration is decoupled from the lawful purposes of detention, rendering it arbitrary and excessive.

Indeed, continuing to hold Petitioner appears punitive rather than regulatory. Petitioner has done nothing to warrant punishment; he is an asylum seeker awaiting his day in court. In *Demore*, the Supreme Court allowed brief detention of criminal deportees because their risk was categorically higher and their cases typically faster to resolve. By contrast, detaining a cooperative asylum applicant for a prolonged, open-ended period flips *Demore*'s logic on its head. It inflicts punishment (loss of liberty) without a corresponding regulatory benefit. The Supreme Court has made clear that “[i]n 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). Petitioner’s detention does not fall into any “carefully limited exception” – it is the product of unfettered discretion, not tailored necessity.

2. Lack of Procedural Due Process – No Hearing or Review: Compounding the problem, Petitioner’s detention has been implemented with no meaningful procedural safeguards. When ICE decided to revoke Petitioner’s release, it did so without giving Petitioner notice or an opportunity to be heard. Petitioner was not informed of any alleged non-compliance (because there was none) and had no chance to rebut any concern ICE might have had. Moreover, since being detained, Petitioner has not received a bond hearing before an immigration judge to determine if his detention is justified. This complete absence of process violates the fundamental requirement that the government must follow fair procedures when taking away a person’s liberty.

An analogy can be drawn to the revocation of parole or probation in the criminal context: even though parolees have been convicted of crimes, the Supreme Court held in *Morrissey v. Brewer*, 408 U.S. 471 (1972), that because they have conditional liberty, that liberty cannot be withdrawn without certain due process protections, including notice of alleged violations and a hearing before a neutral decision-maker. *Id.* at 482. Petitioner’s situation is civil, not criminal, but the stakes (personal freedom) are equally high. By virtue of being released on recognizance, Petitioner had a conditional liberty interest – he was permitted to

live freely under specified conditions. The government cannot arbitrarily extinguish that liberty interest without affording him similar due process protections. Yet ICE provided no process whatsoever: no allegations of misconduct, no hearing, not even a contemporaneous administrative review. This summary incarceration runs afoul of due process.

The minimal process that is due in this context is at least a prompt bond hearing after re-detention, where the government must justify continued detention. Under Third Circuit case law, prolonged detention without a bond hearing violates due process, and courts have ordered bond hearings to remedy such violations .

Petitioner's detention, while just over two months at this filing, is poised to become prolonged as he awaits completion of his asylum case (which could take additional months or more, especially if appeals are involved). There is no legitimate reason to delay a bond hearing until some arbitrary future point when the need for one is already evident now: Petitioner's detention lacked justification from inception. Thus, both to rectify the initial due process violation (revoking release without process) and to prevent an impending prolonged detention violation, this Court should intervene.

Notably, even the immigration regulations anticipate that when DHS revokes a release, the noncitizen should be able to seek an IJ's review. See 8 C.F.R. § 1236.1(d)(1). If, for any reason, Petitioner has been unable to obtain a prompt hearing in the immigration court, that only underscores the necessity of habeas relief. The Constitution does not tolerate a person languishing in jail by bureaucratic inertia or oversight.

In summary, Petitioner's continued detention violates due process because it unnecessarily and unreasonably deprives him of liberty. There is no evidence that Petitioner's freedom pending trial posed any problem that needed solving – he dutifully appeared at ICE and court as required. By incarcerating him without cause or hearing, the government has acted in a manner that the Fifth Amendment forbids. As the Supreme Court warned, “[t]he Constitution may well preclude granting an administrative body the unreviewable authority to make determinations implicating fundamental rights.” *Zadvydas*, 533 U.S. at 692 . Here, ICE has assumed unreviewable authority to jail Petitioner, and this Court's intervention is needed to restore constitutional order.

### **III. Relief Sought**

For the reasons above, Petitioner has established that his detention is unauthorized by statute and unconstitutional. Under 28 U.S.C. § 2241(c)(3), he is entitled to habeas corpus relief because he is “in custody in violation of the Constitution or laws... of the United States.” Petitioner respectfully requests that this Court grant the writ and order appropriate relief as detailed below.

WHEREFORE, Petitioner Cheikh Mohamed Vadel (Mohamed Saed Bouh) prays that this Court grant the following relief:

1. Issue a Writ of Habeas Corpus ordering Petitioner’s immediate release from ICE custody. Petitioner is willing to comply with any conditions the Court or DHS may impose, including continued reporting requirements or other reasonable supervision conditions, to ensure his appearance for immigration proceedings.
2. In the alternative, order Respondents to provide Petitioner with a prompt individualized bond hearing before an Immigration Judge (or before this Court, if appropriate) at which the government bears the burden of

demonstrating by clear and convincing evidence that Petitioner's continued detention is justified. If the government cannot meet this heavy burden, Petitioner should be released.

3. Declare that Petitioner's detention without a bond hearing to date has been unlawful and in violation of the INA and the Fifth Amendment.
4. Enjoin further unlawful detention. Enjoin Respondents from re-detaining Petitioner on the same facts in the future without providing proper notice and procedures, and retain jurisdiction to monitor compliance with the Court's orders;
5. Grant any further relief that this Court deems just and proper, in the interests of justice.

Respectfully submitted,

/s/ Demetrios Tsarouhis

Demetrios Tsarouhis Tsarouhis Law  
Group LLC  
21 S. 9th Street  
Allentown PA 18102  
Ph: 610-628-2440  
Fax: 610-465-8844  
Email: [dht@pacollections.com](mailto:dht@pacollections.com)  
Counsel for Petitioner  
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