

FILED

Sworn affidavit in Support of my Habeas Corpus

DEC 19 2025

JOAN KANE, CLERK
U.S. DIST. COURT, WESTERN DIST. OKLA
DEPUTY

I swear under penalty of perjury that the following is true to the best of my knowledge and recollection

I was inspected and admitted into the United States as a lawful permanent resident when I was 18 months and I have lived all my life in the United States. I made a life altering mistake by associating with the wrong crowd in Oklahoma and was also in trouble for driving under the influence causing great bodily harm. I was sentenced to a term of 5 years incarceration in the custody of Oklahoma Department of Corrections where I did 18 months out of 5 years with good behavior and was subsequently released to the custody of Immigration and customs enforcement where I was detained pending the resolution of my removal proceedings for 6 months to which I was then ordered removed on the 6th of October 2006 and was continually detained for another 18 months after my order of removal became final. During these removal period I had fully cooperated with ICE by calling my consulate to request travel documents as well as signing any and every document ICE requested me to sign and the answer ICE and myself received was "No". After a prolonged time in detention, I filed a petition for Habeas Corpus pursuant to 28 U.S.C §2241 and ICE finally placed me on an order of supervision and I had remained for 19 years now, and still continuously reached to my consulate to request travel documents and the answer has remained no even when ICE and had called my consulate.

Since being placed on an Order of Supervision, I had cooperated fully with every condition of release on an order of supervision and never violated any of these conditions and I had also completed yearly check-ins, where we always attempted to call my consulate to secure travel documents. Since being re detained by ICE, I have not been given any reason as to why I had been re detained and neither have I had any interviews or advised on any changes in circumstances and now, I have been in detention for the second time for over six months without me being removed. I have also been denied both the 90 day and 180 day custody reviews.

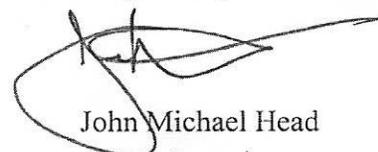
While being in detention, myself and my family including my business has suffered immense hardship and if continued to be detained would cause irreparable harm to me, my family and my businesses. My son is autistic and depends on me for support and special care to which my detention has a dramatically affected his behavioral skills, school work, and mental and health. His autism has gotten worse with my absence.

My flood restorations business and carpentry business has shut down and I have had to sell a lot of my work equipment to support my family.

The conditions of confinement is akin to a maximum security prison with limited movement, an hour of recreation a day with some days without access to recreation. The food is not nutritional and the portions are very small and inedible for multiple reasons with different reasons with different meals like being to salty or serving food from the day before. we are fed really late with breakfast as early as 6:00am, lunch at 3pm and dinner sometimes as late as 7pm.

We are constantly confined to our pod and confined in our cells for a minimum of 12 hours and 30 minutes with most days being way above that number. We are confined in a cell for 15-17 hours a day.

Respectfully Submitted



John Michael Head

12/18/25