

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO

Civil Action No. 25-cv-04199-RTG
(To be supplied by the court)

JAN 15 2026

JEFFREY P. COLWELL
CLERK

Vladimir Savir, Applicant,

v.

Aurora Detention Center, Colorado Respondent.
(Name of warden, superintendent, jailer, or other custodian)

(Note: If you are attacking the validity of a state conviction or sentence and not the execution of your sentence, you must file an application for a writ of habeas corpus pursuant to 28 U.S.C. § 2254. If you are attacking the validity of a judgment entered in a federal court, you must file a motion pursuant to 28 U.S.C. § 2255 in the federal court that entered the judgment.)

APPLICATION FOR A WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

A. APPLICANT INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

Vladimir Savir 

(Applicant's name, prisoner identification number, and complete mailing address)

Aurora Detention Center

Indicate whether you are a prisoner or other confined person as follows: (check one)

Pretrial detainee

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- Civilly committed detainee
- Immigration detainee
- Convicted and sentenced state prisoner
- Convicted and sentenced federal prisoner
- Other: (Please explain) _____
-

B. RESPONDENT INFORMATION

Warden, Aurora Detention Center, Colorado

(Respondent's name and complete mailing address)

3130 Oakland Street, Aurora, CO 80010

C. STATEMENT OF CLAIMS

State clearly and concisely every claim you are asserting in this action. For each claim, specify the right that allegedly has been violated and all facts that support your claim. If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "C. STATEMENT OF CLAIMS."

CLAIM ONE: 180-Day Custody Review Request - Humanitarian and
Medical Grounds

Supporting facts:

I am attaching 16 pages of explanation for this form

D. PRIOR APPLICATIONS

Have you ever filed a lawsuit, other than this lawsuit, in any federal court in which you raised or could have raised the claim(s) raised in this action? Yes No (check one).

If your answer is "Yes," complete this section of the form. If you have filed more than one prior application, use additional paper to provide the requested information for each prior application. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "D. PRIOR APPLICATIONS."

Name and location of court: _____

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Case number: _____

Type of proceeding: _____

List the claim(s) raised:

Date and result: (Attach a copy of the decision if available) _____

Result on appeal, if appealed:

E. ADMINISTRATIVE REMEDIES

WARNING: You must exhaust administrative and/or state remedies before filing an action in federal court pursuant to 28 U.S.C. § 2241. Your case may be dismissed if you have not exhausted administrative and/or state remedies. If additional space is needed to explain exhaustion, use extra paper to do so. Please indicate that additional paper is attached and label the additional pages regarding exhaustion as "E. ADMINISTRATIVE REMEDIES."

Explain the steps you have taken to exhaust administrative and/or state remedies: _____

F. REQUEST FOR RELIEF

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "F. REQUEST FOR RELIEF."

I am attaching 16 pages of explanation for this form.

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G. APPLICANT'S SIGNATURE

I declare under penalty of perjury that I am the applicant in this action, that I have read this application, and that the information in this application is true and correct. See 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this application: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the application otherwise complies with the requirements of Rule 11.

Savir V. [Signature]
(Applicant's signature)

01/12/2026
(Date)

(Form Revised December 2017)

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Declaration of Vladimir Savin

In support of petition for writ of Habeas Corpus

I, Vladimir Savin, declare under penalty of perjury that the following is true and correct to the best of my knowledge:

1. I am the Petitioner in this habeas corpus action. I submit this declaration in support of my Petition challenging my prolonged and unlawful immigration detention.
2. I am a person with higher education. I am an engineer by profession. I have no criminal history, no arrests, and no convictions in any country. I have always lived a law-abiding life and pose no danger to the community.
3. I am a husband and a father. I have a wife and a minor son. My asylum case is not an individual case - it is a family-based case, based on persecution directed at my child and our family as a whole.

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4. At the time of entry into the United States, my family was forcibly separated by the government. My wife and my minor son were allowed to enter the United States, while I was detained and placed into immigration custody. This separation occurred at the border and was not based on any wrongdoing on my part.
5. Since that moment, my immigration case has been treated as if I were a single individual, without meaningful consideration of my family unity. My wife and child have remained outside detention, while I have been held in immigration custody for an extended period of time.
6. Throughout my immigration proceedings, I was forced to represent myself without an attorney, without legal education, and with limited access to legal materials. Despite these obstacles, I gathered extensive evidence over many years to demonstrate the persecution my family faced and the danger to my child.
7. On July 14, 2025, after approximately eight months in detention, I had my final individual hearing before immigration Judge Roel Conales. Despite the substantial evidence presented, asylum was denied to me and my family.

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8. I filed an appeal with the Board of Immigration Appeals (BIA). Due to a technical error in the initial filing of Form EOIR-26, my first appeal was rejected. I promptly refiled a corrected appeal and submitted a motion explaining the reasons for the delay. My appeal was accepted and registered by the BIA on September 8, 2025.
9. On September 12, 2025, despite the pending appeal, ICE attempted to deport me. I was transferred from WEBB County Detention Center to Elizabeth Detention Center. This transfer lasted four days. Only on September 16, 2025, did I learn that my appeal had already been accepted by the BIA.
10. During my detention, I repeatedly requested a copy of the Immigration Judge's written decision and the hearing transcript. While detained at WEBB County Detention Center, I was informed that I would receive these documents only after my appeal was accepted. After my transfer to Elizabeth Detention Center, I was told that I must request these documents directly from the court. As a result, I was forced to prepare my appellate brief without access to the written decision or transcript.

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11. My prolonged detention has seriously affected my physical health. Since April 2024, my blood test results have shown abnormal and worsening indicators. In addition, I have been diagnosed with a large gallstone in my gallbladder. These conditions require medical attention, which has not been adequately provided in detention.
12. My continued detention has caused extreme emotional suffering to my family. My wife has been forced to raise our child alone, while my son has endured the trauma of being separated from his father for more than a year. This separation has caused significant psychological harm to our family.
13. I believe that my prolonged detention, the lack of adequate medical care, the failure to consider my family unity, and the absence of any legitimate justification for my continued custody violate my constitutional rights under the Due Process Clause.
14. I respectfully request that the Court grant my Petition for Writ of Habeas Corpus and order my immediate release, or, in the alternative, order an individualized bond hearing.

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I declare under penalty of perjury that the foregoing is true and correct.

Date: 01/12/2026

Place: Aurora, Colorado

Signature: Savin V. 

Vladimir Savin

A-Number: 

IN SUPPORT OF PETITION ^{of 12} FOR WRIT
OF HABEAS CORPUS

I, Olga Savina (wife of Vladimira Savina), declare under penalty of perjury that the following is true and correct to the best of my knowledge:

- 1) I, am the wife of Vladimir Savin and the mother of our minor son, Daniil. I submit this declaration in support of my husband's Petition for Writ of Habeas Corpus.
- 2) Our family came to the United States seeking protection. Our asylum case is based on persecution directed at our child and our family as a whole. We did not come to the United States to violate any laws, but to save our child and preserve our family.
- 3) At the border, our family was forcibly separated. I and our minor son were allowed to enter United States, while my husband was detained and placed into immigration custody. This separation was devastating and unexpected.
- 4) Since that moment, I have been raising our child alone while my husband remains in detention. I have had to take full responsibility for our son's emotional, educational, and daily needs without the support of his father.
- 5) Our son has suffered deeply from the prolonged separation. He constantly asks when his father will come home. He experiences fear, anxiety, and emotional distress due to the absence of his father.
- 6) My husband has no criminal history and has always been a caring responsible father and husband. His detention is not justified by any danger or risk.
- 7) I am deeply concerned about my husband's health. I am aware that his blood test results have been abnormal for a long period and that he has been diagnosed with a large gallstone. I fear that continued detention places his health at serious risk.
- 8) The prolonged detention of my husband has caused severe emotional, psychological, and financial hardship to our family. This situation has broken our family unity and continues to harm our child.

9) I respectfully ask the Court to consider the devastating impact of my husband's detention on our family and to grant his release, or at minimum order an individualized bond hearing.

I declare under penalty of perjury that the foregoing is true and correct.

01.09.2026

Sfr
Olga Savina.

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Declaration of Daniil (Minor child)

My name is Daniil, and I am writing on behalf of my father, Vladimir Savin.

I'm a student in New York, and I miss my dad very much. It has been almost a year since he was taken from us, and every day I hope that he can come home. My dad has never been a bad person. He is kind, calm, and he always protected me. It is very hard for me without him.

I worry about him every day, especially because he is not feeling well in detention. I want him to be safe and receive medical care. Please allow him to come home while he continues his legal process. We will support him and make sure he attends all future hearings.

Thank you for reading my letter.

Respectfully

Daniil.