
PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Instructions

1. **Who Should Use This Form.** You should use this form if
 - you are a federal prisoner and you wish to challenge the way your sentence is being carried out (*for example, you claim that the Bureau of Prisons miscalculated your sentence or failed to properly award good time credits*);
 - you are in federal or state custody because of something other than a judgment of conviction (*for example, you are in pretrial detention or are awaiting extradition*); or
 - you are alleging that you are illegally detained in immigration custody.

2. **Who Should Not Use This Form.** You should not use this form if
 - you are challenging the validity of a federal judgment of conviction and sentence (*these challenges are generally raised in a motion under 28 U.S.C. § 2255*);
 - you are challenging the validity of a state judgment of conviction and sentence (*these challenges are generally raised in a petition under 28 U.S.C. § 2254*); or
 - you are challenging a final order of removal in an immigration case (*these challenges are generally raised in a petition for review directly with a United States Court of Appeals*).

3. **Preparing the Petition.** The petition must be typed or neatly written, and you must sign and date it under penalty of perjury. **A false statement may lead to prosecution.**

4. **Answer all the questions.** You do not need to cite law. You may submit additional pages if necessary. If you do not fill out the form properly, you will be asked to submit additional or correct information. If you want to submit any legal arguments, you must submit them in a separate memorandum. Be aware that any such memorandum may be subject to page limits set forth in the local rules of the court where you file this petition. If you attach additional pages, number the pages and identify which section of the petition is being continued. All filings must be submitted on paper sized 8½ by 11 inches. **Do not use the back of any page.**

5. **Supporting Documents.** In addition to your petition, you must send to the court a copy of the decisions you are challenging and a copy of any briefs or administrative remedy forms filed in your case.

6. **Required Filing Fee.** You must include the \$5 filing fee required by 28 U.S.C. § 1914(a). If you are unable to pay the filing fee, you must ask the court for permission to proceed in forma pauperis – that is, as a person who cannot pay the filing fee – by submitting the documents that the court requires.

7. **Submitting Documents to the Court.** Mail your petition and _____ copies to the clerk of the United States District Court for the district and division in which you are confined. For a list of districts and divisions, see 28 U.S.C. §§ 81-131. All copies must be identical to the original. Copies may be legibly handwritten.

If you want a file-stamped copy of the petition, you must enclose an additional copy of the petition and ask the court to file-stamp it and return it to you.

8. **Change of Address.** You must immediately notify the court in writing of any change of address. If you do not, the court may dismiss your case.

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UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

MAHAMADOU DOUCURE

Petitioner

v.

JL JAMISON, WARDEN, FEDERAL DETENTION CENTER

Respondent

(name of warden or authorized person having custody of petitioner)

Case No. (Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

- 1. (a) Your full name: MAHAMADOU DOUCURE
(b) Other names you have used: NA
2. Place of confinement:
(a) Name of institution: FEDERAL DETENTION CENTER
(b) Address: 700 ARCH STREET PHILADELPHIA, PA 19107
(c) Your identification number:
3. Are you currently being held on orders by:
[checked] Federal authorities [] State authorities [] Other - explain:
4. Are you currently:
[] A pretrial detainee (waiting for trial on criminal charges)
[] Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced you:
(b) Docket number of criminal case:
(c) Date of sentencing:
[checked] Being held on an immigration charge
[] Other (explain):

Decision or Action You Are Challenging

- 5. What are you challenging in this petition:
[] How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

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- Pretrial detention
- Immigration detention
- Detainer
- The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
- Disciplinary proceedings
- Other (*explain*):

6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: UNITED STATES IMMIGRATION AND CUSTOMS ENFORCEMENT

(b) Docket number, case number, or opinion number: A [REDACTED] (ALIEN NUMBER)

(c) Decision or action you are challenging (*for disciplinary proceedings, specify the penalties imposed*):

I AM CHALLENGING MY DETENTION BASED ON THE FACT THAT, DESPITE AN ORDER OF REMOVAL, I HAVE AN APPROVED REFUGEE ASYLUM PETITION IN AS 2 CLASS; BENEFICIARY OF A SPOUSAL PETITION FILED BY MY SPOUSE WHO IS NOW A U.S. CITIZEN; AND I AM A FATHER OF 5 U.S. CHILDREN

(d) Date of the decision or action: 12/19/2025

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

Yes No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court:

FILED A MOTION TO REOPEN REMOVAL PROCEEDINGS WITH THE IMMIGRATION COURT

(2) Date of filing: 12/22/2025

(3) Docket number, case number, or opinion number:

(4) Result: PENDING

(5) Date of result:

(6) Issues raised: REOPENING OF THE AN ORDER OF REMOVAL DATED JULY 8, 1999.

(b) If you answered "No," explain why you did not appeal:

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

Yes No

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(a) If "Yes," provide:

- (1) Name of the authority, agency, or court:

- (2) Date of filing:
- (3) Docket number, case number, or opinion number:
- (4) Result:
- (5) Date of result:
- (6) Issues raised:

(b) If you answered "No," explain why you did not file a second appeal:

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

Yes No

(a) If "Yes," provide:

- (1) Name of the authority, agency, or court:

- (2) Date of filing:
- (3) Docket number, case number, or opinion number:
- (4) Result:
- (5) Date of result:
- (6) Issues raised:

(b) If you answered "No," explain why you did not file a third appeal:

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

Yes No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

Yes No

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If "Yes," provide:

- (1) Name of court:
- (2) Case number:
- (3) Date of filing:
- (4) Result:
- (5) Date of result:
- (6) Issues raised:

- (b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

Yes No

If "Yes," provide:

- (1) Name of court:
- (2) Case number:
- (3) Date of filing:
- (4) Result:
- (5) Date of result:
- (6) Issues raised:

- (c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence:

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

Yes No

If "Yes," provide:

- (a) Date you were taken into immigration custody: 12/19/2025
- (b) Date of the removal or reinstatement order: 07/08/1999
- (c) Did you file an appeal with the Board of Immigration Appeals?

Yes No

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If "Yes," provide:

- (1) Date of filing:
- (2) Case number:
- (3) Result:
- (4) Date of result:
- (5) Issues raised:

(d) Did you appeal the decision to the United States Court of Appeals?

Yes No

If "Yes," provide:

- (1) Name of court:
- (2) Date of filing:
- (3) Case number:
- (4) Result:
- (5) Date of result:
- (6) Issues raised:

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

Yes No

If "Yes," provide:

(a) Kind of petition, motion, or application: MOTION TO REOPEN REMOVAL PROCEEDINGS

(b) Name of the authority, agency, or court: PHILADELPHIA IMMIGRATION COURT

(c) Date of filing: 12/22/2025

(d) Docket number, case number, or opinion number:

(e) Result: PENDING

(f) Date of result:

(g) Issues raised:

Grounds for Your Challenge in This Petition

- 13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: I AM BEING HELD IN VIOLATION OF THE DUE PROCESS CLAUSE OF THE UNITED STATES CONSITUTION WHICH GUARANTEES THAT MY LIBERTY SHOULD NOT BE RESTRAINED WITHOUT DUE PROCESS AND A FAIR HEARING. SEE U.S CONSTITUTION AMENDMENT V/XIV.SEE ALSO ZADVYDAS V. DAVIS 533 US 678 (2001)

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

ALTHOUGH I HAD A GRANT OF VOLUNTARY DEPARTURE I COULD NOT LEAVE BECAUSE OF THE POLITICAL AND VIOLENT, SOCIAL SITUATION IN MY COUNTRY; THEREAFTER ON 05/06/2021 I GOT AN APPROVAL OF A REFUGEE ASYLUM RELATIVE PETITION. THIS PREVENTS MY REMOVAL FROM THE UNITED STATES, BUT IF I AM DETAINED, I WILL REMAIN DETAINED INDEFINITELY SINCE I CANNOT BE REMOVED, AND THIS PROLONGED DETENTION IS IN VIOLATION OF MY RIGHT TO DUE PROCESS.

(b) Did you present Ground One in all appeals that were available to you?

Yes No

GROUND TWO: IF MY IMMIGRATION PROCEEDINGS ARE REOPENED I WOULD BE IMMEDIATELY ADJUSTABLE IN THAT I AM THE BENEFICIARY OF A PETITION FOR IMMEDIATE RELATIVE AND I ENTERED THE U.S. UPON A LAWFUL INSPECTION ON SEPETEMBER 5,1997. MY WIFE IS A US CITIZEN AND THE PETITION THAT IS PENDING, IF APPROVED, WOULD IMMEDIATELY GRANT ME IR STATUS

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

THE FIFTH AMENDMENT TO THE US CONSTITUTION STATES THAT A PERSON CANNOT BE DEPRIVED OF THEIR LIBERTY WITHOUT DUE PROCESS WHICH MEANS A FAIR HEARING. I HAVE NOT BEEN GIVE AN OPPORTUNITY TO STATE WHY MY PROLONGED DETENTION WITHOUT A WEIGHING OF MY POSITIVE FACTORS IS UNFAIR, CONSIDERING THAT I HAVE NO CRIMINAL RECORD, I HAVE BEEN WORKING WITH AUTHORIZATION AND PAYING TAXES AND OBEYING ALL OF THE LAWS

(b) Did you present Ground Two in all appeals that were available to you?

Yes No

GROUND THREE: MY PROLONGED DETENTION WILL MAKE IT VIRTUALLY IMPOSSIBLE FOR ME TO PRESENT MY CLAIM FOR IMMIGRATION BENEFITS AND RELIEF, NAMELY ADJUSTMENT OF STATUS AS THE SPOUSE OF A UNITED STATES CITIZEN, SINCE IT WILL MAKE IT MUCH MORE DIFFICULT FOR MY ATTORNEY TO MEET WITH ME AND DO HIS DUE DILIGENCE IN CONNECTION WITH MY CASE.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

IF I AM NOT RELEASED, I WILL HAVE A VERY DIFFICULT TIME MEETING WITH AND COORDINATING WITH MY ATTORNEY, ESPECIALLY IF I AM MOVED TO A DETENTION CENTER THAT IS GEOGRAPCIALLY FAR FROM MY ATTORNEY'S OFFICE. IT WILL BE MUCH MORE DIFFICULT IF NOT VIRTUALLY IMPOSSIBLE TO MEET WITH HER AND TO PREPARE THE NECESSARY DOCUMENTS AND PAPER WORK IN ORDER TO CORROBORATE MY APPLICATION FOR RELIEF

(b) Did you present Ground Three in all appeals that were available to you?

Yes No

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GROUND FOUR: MY PROLONGED DETENTION WILL HAVE THE COLLATERAL EFFECT OF HARMING MY FAMILY MEMBERS WHO DEPEND UPON MY FOR THEIR ECONOMIC SUPPORT, INCLUDING MY WIFE AND MY FIVE MINOR CHILDREN

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

I AM THE PRIMARY BREADWINNER IN THE FAMILY, AND IF I AM SUBJECT TO PROLONGED DETENTION I WILL NOT BE ABLE TO WORK EVEN THOUGH I HAVE WORK AUTHORIZATION, AND THIS WILL MAKE IT MUCH MORE DIFFICULT FOR MY FAMILY, ALL OF WHOM ARE US CITIZENS, TO SURVIVE.

(b) Did you present Ground Four in all appeals that were available to you?

Yes

No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: I DID NOT PRESENT ANY OF THESE GROUNDS BECAUSE AS I ESTABLISHED THERE IS NO APPEAL RIGHT FROM THIS ARBITRARY DECISION TO DETAIN ME

Request for Relief

15. State exactly what you want the court to do: I RESPECTFULLY PRAY THIS HONORABLE COURT TO RELEASE ME IN ORDER THAT I MIGHT BE ABLE TO PURSUE MY CLAIM FOR RELIEF

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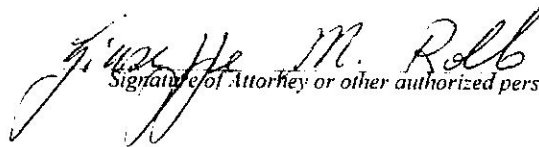
Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 12/30/2025

Signature of Petitioner


Signature of Attorney or other authorized person, if any