

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT
for the
Eastern District of Pennsylvania

CARLOS FERNANDO BOLOM TZI

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: CARLOS FERNANDO BOLOM TZI
(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:
[X] 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:
[X] 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 I CURRENTLY HAVE A PENDING APPLICATION FOR RELIEF BEFORE THE IMMIGRATION COURT AND HAVE NOT VIOLATED ANY OF THE TERMS IMPOSED BY MY REQUEST FOR ASYLUM RELIEF. I HAVE NO CRIMINAL VIOLATIONS
- (d) Date of the decision or action: 12/25/2025

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: _____
 - (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 appeal: THERE IS NO APPEAL FROM THE ACTION AND UNDER RECENT BOARD OF IMMIGRATION APPEALS PRECEDENT, NAMELY MATTER OF YAJURE HURTADO, 29 I&N Dec. 216 (BIA 2025) THERE IS NO ADMINISTRATIVE AGENCY RELIEF

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: **PLEASE SEE RESPONSE TO THE REQUEST FOR INFORMATION CONCERNING A FIRST 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: **PLEASE SEE RESPONSE TO REQUEST FOR INFORMATION CONCERNING A FIRST 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: 12/25/2025
- (b) Date of the removal or reinstatement order: _____
- (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: _____
 - (b) Name of the authority, agency, or court: _____
- _____
- (c) Date of filing: _____
 - (d) Docket number, case number, or opinion number: _____
 - (e) Result: _____
 - (f) Date of result: _____
 - (g) Issues raised: _____
- _____
- _____
- _____

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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 CONSTITUTION WHICH GUARANTEES THAT MY LIBERTY SHOULD NOT BE RESTRAINED WITHOUT DUE PROCESS AND A FAIR HEARING. SEE US CONSTITUTION AMENDMENT V SEE ALSO ZADVYDAS V. DAVIS 533 US 678 (2001)

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 Do not cite cases or law.):

I HAVE AN APPLICATION FOR ASYLUM PENDING WITH THE IMMIGRATION COURT WHICH HAS SCHEDULED ME FOR A FINAL HEARING ON NOVEMBER 3,2026.(SEE ATTACHED NOTICE) THE ARRESTING I.C.E. AGENTS WERE LOOKING FOR SOMEBODY ELSE. I WAS THE VICTIM OF A COLLATERAL ARREST.

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

Yes No

GROUND TWO: THE LAW THAT ALLOWS A BOND FOR PEOPLE WHO ENTERED THE U.S.AS AN E.W.I. IS IN A STATE OF FLUX AND I M NOT NOT IN THE JURISDICTION OF THE IMMIGRATION COURT I WILL BE SUBJECTED TO CONTINUED DETENTION WITHOUT BEING ABLE TO APPLY FOR A BOND.

(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 GIVEN 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 ASYLUM RELIEF AS IT WILL IMPROPERLY BURDEN MY ABILITY TO MEET WITH MY ATTORNEY AND PREPARE MY ASYLUM CASE FOR REVIEW. STATISTICS SHOW THAT DETAINED INDIVIDUALS HAVE A MUCH LOWER RATE OF SUCCESS THAN THOSE NOT DETAINED

(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 CLAIM FOR RELIEF

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

Yes No

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GROUND FOUR:

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

BY BEING HELD FOR A LONG PERIOD OF TIME I WILL LOSE MY EMPLOYEMENT EVEN THOUGH I AM LEGALLY AUTHORIZED TO WORK .ALSO MY PROLONGED DETENTION WILL MAKE IT MORE DIFFICULT FOR ME TO BE ABLE TO PROCESS MY ASYLUM CLAIM.

(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: 01/02/2026

Signature of Petitioner

Signature of Attorney or other authorized person, if any