

UNITED STATES DISTRICT COURT

MIDDLE DISTRICT OF PENNSYLVANIA

[PAUL PERRIS] - Petitioner

v.

[ANGELA HOOVER] - Warden [Clinton county -
Correctional Facility]

Acting Director of Williamsport ICE officer - [Reid]
[Kristi Noem] Secretary of the US Department
of Homeland Security

[PAMELA BONDI] Attorney General of the United States,
in their official capacities, - Respondents

INTRODUCTION

① My name is Paul Perris, bringing this habeas
Corpus petition under § 2241 to this honorable
court, I am a 30 year old native of INDIA, but
have been residing in Michigan, USA since 2024
I came legally into the united states through
work visa in 2017. I am married to a US -
Citizen since 2022 and I have a pending
asylum filed with USCIS since 2025. I have
been scheduled for my biometrics appointment
for my asylum case with the USCIS.

FILED
SCRANTON

JAN 12 2026

PER DJ
DEPUTY CLERK

Please turn over → ①

② I was detained at the centre County correctional facility, Bellefonte PA, due to an alleged bad check charge, but after proper investigation into the offense, the case got ultimately dismissed. I was transferred to clinton county Jail by ICE agent on December 29, 2025 and I was not informed why I was being brought here.

③ I have been unlawfully detained by ICE at the clinton County jail for over 7 days as of now, without any bond hearing or foreseeable release in sight. This detention violates my constitutional due process right of the 5th amendment and the administrative procedure act. ICE agents has not provided me any paperwork, nor arrest warrant to show the bases of my detention at this facility.

④ This detention is becoming unbearable, and unconstitutional, It is a violation of my Interest of liberty to be free. I hereby respectfully request this court to order a grant of writ habeas corpus ordering my immediate release from this unlawful detention.

⑤ I urge the Court to order respondents to show cause within 3 business days and to expeditiously order a summary Judgment granting my Petition within 7 days.

Respectfully Submitted

PAUL PERRIS

Paul Perris

III. CUSTODY STATEMENT

Petitioner is "in the custody" for purposes of 28 USC § 2241, because he is currently detained by the US Department of Homeland Security (DHS) Immigration and Customs Enforcement (ICE) and held at Clinton County Correctional Facility 58, Pine Mountain Rd, McElhattan, PA 17748. Petitioner's immediate custodian is Angela Hoover - Warden of the facility, making her a proper respondent; ICE operations in Williamsport are also proper respondents because they exercise legal authority over petitioner's ICE detention.

IV. EXHAUSTION OF REMEDIES

Petitioner is not required to exhaust remedies before filing a § 2241 Petition where:-

- ① Detention challenge raises pure legal and constitutional questions
- ② Administrative remedies are futile and inadequate
- ③ Continued detention inflicts irreparable harm, including prolonged separation from family and worsening conditions.

I. JURISDICTION

This court has jurisdiction over this petition to 28 USC § 2241, which authorizes federal courts to grant habeas relief to individuals in custody in violation of the Constitution or laws or treaties of the United States. Immigration detainees challenging the legality of the Constitutionality of their detention rather than the validity of a removal order may seek relief under § 2241. The proper relief *Zadrydas v. Davis* 533 US 678 (2001)

Petitioner challenges the legality of his continued detention, making § 2241 jurisdiction court under Article I and III of the US constitution because petitioner's continued violates the Due process clause of the 5th Amendment, the INA and 8 USC § 1226e

II. VENUE

venue is the proper in the middle district of Pennsylvania because petitioner is detained at the Clinton County Correctional facility in Mc elhattan, PA, which lies within the district. *Rumsfeld v. Padilla*, 542 U.S. 426, 443 (2004)