

JUDGE LEON SCHYDLER

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

FILED
JAN 12 2026
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF TEXAS
BY *[Signature]* DEPUTY CLERK

Artur Petriakov,

Case No. _____

Petitioner,

PETITION FOR

v.

WRIT OF HABEAS

CORPUS

Warden of the El Paso Processing Center;

Mary De Anda-Ybarra,

Director of El Paso Field Office; Kristi Noem,

Secretary of the United States Department of Homeland

Security; and Pamela Bondi, Attorney General of the

United States, in their official capacities,

Respondents.

EP 26 CV 0040

INTRODUCTION

1. Petitioner, Artur Petriakov, respectfully petitions this Honorable Court for a Writ of Habeas Corpus under 28 U.S.C. § 2241. Petitioner, Artur Petriakov, is an asylum applicant and has a pending application before the Immigration Court.
2. Artur Petriakov challenges ongoing violations of his due process rights, inhumane detention conditions, and lack of adequate medical support. Accordingly, to vindicate Petitioner's constitutional rights, this Court should grant the instant petition for a writ of habeas corpus.

3. Absent an order from this Court, Petitioner's family will suffer financially as Artur Petriakov was their primary source of income. In addition, the insufficient facility conditions and lack of medical care threaten to cause further serious medical and psychological harm.
4. Petitioner asks this Court to find that he should be released or, in the alternative, granted a right to a bond hearing consistent with due process of law.

JURISDICTION

1. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 et seq.
2. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).
3. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.
4. Exhaustion of administrative remedies is excused because Petitioner has been denied any bond hearing or individualized custody determination, and no adequate or timely administrative remedy exists to remedy the ongoing constitutional violations challenged in this Petition.

VENUE

1. Venue is proper because Petitioner is detained at El Paso Processing Center in El Paso, Texas, which is within the jurisdiction of this District.
2. Venue is proper in this District because a substantial part of the events or omissions giving rise to his claims occurred in this District and Petitioner is detained in this District, and no real property is involved in this action. 28 U.S.C. § 1391(e).

REQUIREMENTS OF 28 U.S.C. § 2243

1. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return “within *three days*, or such other time as the Court deems appropriate, unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.* (emphasis added).
2. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963) (emphasis added).

PARTIES

1. Petitioner is an asylum applicant. Petitioner was recently transferred to El Paso Processing Center from El Paso Camp East Montana. Petitioner is in the custody, and under the direct control, of Respondents and their agents.
2. Respondent, the Warden of El Paso Processing Center, has immediate physical custody of Petitioner pursuant to the facility’s contract with U.S. Immigration and Customs Enforcement (ICE) and is a legal custodian of Petitioner.
3. Respondent, Mary De Anda-Ybarra, Director of El Paso Field Office, is sued in her official capacity as the Director of the El Paso Field Office of U.S. Immigration and Customs Enforcement. Respondent Mary De Anda-Ybarra is a legal custodian of Petitioner and has authority to release him.
4. Respondent, Kristi Noem, is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security (DHS), and her successors in office. In this capacity, Kristi Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act and oversees U.S. Immigration and Customs

Enforcement, the component agency responsible for Petitioner's detention and custody. Respondent Kristi Noem is a legal custodian of Petitioner.

5. Respondent, Pamela Bondi, is sued in her official capacity as the Attorney General of the United States and the senior official of the U.S. Department of Justice (DOJ). In that capacity, she has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review (EOIR), which administers the immigration courts and the BIA. Respondent Pamela Bondi is a legal custodian of Petitioner.

STATEMENT OF FACTS

1. Artur Petriakov is a citizen of Russia who arrived in the United States on September 24, 2021, and was classified by DHS as an arriving alien for purposes of the Immigration and Nationality Act. Upon entry, Petitioner was granted humanitarian parole into the United States. At no time was Petitioner provided with notice of parole termination, nor was any individualized parole termination determination made pursuant to 8 C.F.R. § 212.5(e).
2. Upon arrival, Mr. Petriakov and his wife, Olga Petriakova, were issued Forms I-94 evidencing lawful parole into the United States, as reflected in Exhibit C.
3. Within one year of entry, Petitioner, Artur Petriakov, timely filed Form I-589 (Application for Asylum), as reflected in Exhibit D. His asylum case remains pending.
4. From September 2021 until his detention, Petitioner, Artur Petriakov, resided continuously in the United States, in California, where he lived with his wife, as reflected in Exhibit E, F. Petitioner has a stable residence, strong family ties, and deep community connections. Petitioner's spouse has submitted a declaration describing the hardship caused by his detention, as reflected in Exhibit G.
5. Petitioner worked, paid taxes, and complied with all laws of the United States. Petitioner has strong community ties, including support from friends and former

employers, who have submitted letters attesting to his character, work history, and reliability, as reflected in Exhibits K and L.

6. Petitioner has no criminal history, no arrests, no convictions, and no violations of law.
7. On October 23, 2025, Petitioner was suddenly detained by ICE in Indiana while lawfully working as a truck driver, without due process. ICE did not provide an arrest report, custody determination, or written explanation for the detention. Petitioner's current ICE detention status is confirmed by DHS records, as reflected in Exhibit I.
8. At the time of Petitioner's arrest, no warrant was presented, and Petitioner was not alleged to have committed any criminal offense. Petitioner was taken into custody without any showing of probable cause and without any prompt or meaningful judicial review of the basis for his detention.
9. Petitioner was never brought before a judicial officer, was never informed of any charges, and was never provided any judicial determination or neutral review regarding the legality or necessity of his custodial detention.
10. At no point was Petitioner served with a written notice of parole termination, nor was any individualized parole termination determination made pursuant to 8 C.F.R. § 212.5(e). Petitioner was never provided notice, a hearing, or any meaningful opportunity to contest or seek review of any alleged termination of parole.
11. Mr. Petriakov is currently detained at El Paso Processing Center, 8915 Montana Avenue, El Paso, TX 79925, United States.
12. Since his detention, Petitioner has not been afforded any bond hearing before an Immigration Judge. No bond hearing has ever been scheduled or conducted in his case, as reflected in Exhibit J.
13. This deprivation is not the result of any waiver, omission, or inaction by Petitioner. Rather, it is the direct consequence of DHS's failure to provide any constitutionally

adequate, individualized custody review to assess the necessity of continued detention, as further described in Exhibit J.

14. Petitioner's immigration counsel was not notified of either the detention or the transfer.
15. Petitioner suffers from documented mental health conditions that predate his detention, as reflected in Exhibit B and H.
16. Prior to detention, Petitioner was prescribed Prozac (fluoxetine). ICE medical providers have continued prescribing psychotropic medication during detention.
17. Despite medication, Petitioner's mental health has significantly deteriorated, including severe anxiety, insomnia, and panic symptoms. Petitioner has also suffered neglect and inadequate medical care in detention, as reflected in Exhibit H.
18. Continued detention exacerbates Petitioner's condition and places him at ongoing medical risk.
19. The detention facility cannot provide adequate, individualized mental health treatment in a custodial setting. This failure constitutes an independent violation of Petitioner's substantive due process rights.
20. On or about November 3, 2025, U.S. Immigration and Customs Enforcement (ICE) publicly disseminated, through an official and publicly accessible social media post, a photograph displaying Petitioner's California commercial driver's license, including his name, photograph, and other identifying information, as reflected in Exhibit A. This public disclosure exposed Petitioner to identity theft, fraud, and misuse of his personal data, and created an additional and serious risk to his safety and liberty interests.
21. Petitioner appears pro se.

LEGAL FRAMEWORK

1. The Fifth Amendment guarantees that no person shall “be deprived of life, liberty, or property, without due process of law.” U.S. Const. amend. V.
2. In *Mathews v. Eldridge*, 424 U.S. 319 (1976), the Supreme Court established the governing test for determining whether due process has been satisfied, requiring a balancing of: (a) the private interest affected by the government action; (b) the risk of erroneous deprivation through the procedures used and the probable value of additional or substitute procedural safeguards; and (c) the government’s interest, including administrative burdens that additional procedures would entail.
3. Here, Petitioner’s private interest—freedom from unlawful physical restraint—is among the most fundamental rights protected by the Constitution. The risk of erroneous deprivation is extraordinarily high because DHS effectively terminated Petitioner’s parole and detained him without notice, hearing, or opportunity to present exculpatory evidence.
4. Federal courts have repeatedly recognized due process violations arising from DHS’s improper procedures in revoking parole and re-detaining individuals without adequate safeguards. See *Mata Velasquez v. Kurzdorfer*, 2025 WL 1953796 (W.D.N.Y. July 16, 2025).
5. Even where detention is authorized by statute, it must comport with the requirements of the Fifth Amendment, and statutory classification alone does not permit prolonged or arbitrary detention without adequate procedural safeguards.
6. The Supreme Court has held that immigration detention must bear a reasonable relation to its purpose and may not be indefinite or arbitrary. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

CLAIMS FOR RELIEF

COUNT ONE

Violation of Fifth Amendment Right to Due Process

1. The allegations in the above paragraphs are realleged and incorporated herein.
2. Respondents' actions in effectively terminating Petitioner's parole and detaining him without notice, hearing, or meaningful opportunity to be heard violate Petitioner's Fifth Amendment right to due process under *Mathews v. Eldridge*.
3. For these reasons, Petitioner's detention violates the Due Process Clause of the Fifth Amendment.
4. Petitioner has submitted a sworn declaration describing these events, as reflected in Exhibit J.

COUNT TWO

Violation of 8 U.S.C. § 1182(d)(5) and Implementing Regulations

1. The allegations in the above paragraphs are realleged and incorporated herein.
2. Respondent's revocation of parole and prolonged detention of Petitioner are contrary to the humanitarian parole provisions of 8 U.S.C. § 1182(d)(5), which authorize parole "for urgent humanitarian reasons or significant public benefit" and require individualized determinations.
3. For these reasons, Petitioner's detention violates 8 U.S.C. § 1182(d)(5).

PRAYER FOR RELIEF

Wherefore, Petitioner respectfully requests this Court to grant the following:

1. Assume jurisdiction over this matter;
2. Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three days, or such time as the Court deems appropriate;

3. Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment, 8 U.S.C. § 1182(d)(5)(A), and/or 8 C.F.R. § 212.5(b);
4. Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately, or in the alternative, order release under appropriate conditions of supervision, or schedule a bond hearing before an immigration judge at which the government bears the burden of proof by clear and convincing evidence and, at such hearing, afford Petitioner a meaningful opportunity to present evidence of eligibility for release, including humanitarian and medical considerations; and
5. Grant any further relief this Court deems just and proper.

Respectfully submitted,



Artur Petriakov

Petitioner (Pro se)

Dated: 12/31/2025

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I, Artur Petriakov, Petitioner, hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Dated this 31 day of December, 2025.

A handwritten signature in dark ink, appearing to be 'AP', is written over a horizontal line.

Artur Petriakov

EXHIBITS

Exhibit A – Screenshots of official ICE social media posts dated November 3, 2025, publicly displaying Petitioner’s identifying information. (3 pages)

Exhibit B – Medical records documenting Petitioner’s diagnosed mental health conditions and prescribed psychotropic medication. (5 pages)

Exhibit C – Form I-94 evidencing Petitioner’s lawful parole into the United States. (1 page)

Exhibit D – USCIS receipt notice confirming acceptance of Form I-589 (Application for Asylum). (1 page)

Exhibit E – Residential lease agreement demonstrating Petitioner’s stable residence and community ties in California. (1 page)

Exhibit F – Marriage certificate evidencing Petitioner’s lawful marriage to Olga Petriakova. (2 pages)

Exhibit G – Declaration of Olga Petriakova describing hardship and family support. (1 page)

Exhibit H – Declaration of Petitioner describing the humanitarian, medical, and psychological harm caused by continued detention. (2 pages)

Exhibit I – ICE custody record confirming Petitioner’s current detention status. (1 page)

Exhibit J – Declaration of Petitioner Regarding Absence of Bond Hearing and Lack of Individualized Custody Review. (1 page)

Exhibit K – Letters from Petitioner’s employer(s) attesting to his lawful employment, work history, reliability, and character. (2 pages)

Exhibit L – Letters from friends and community members attesting to Petitioner’s character, community ties, and support network. (2 pages)

7:18

Chrome

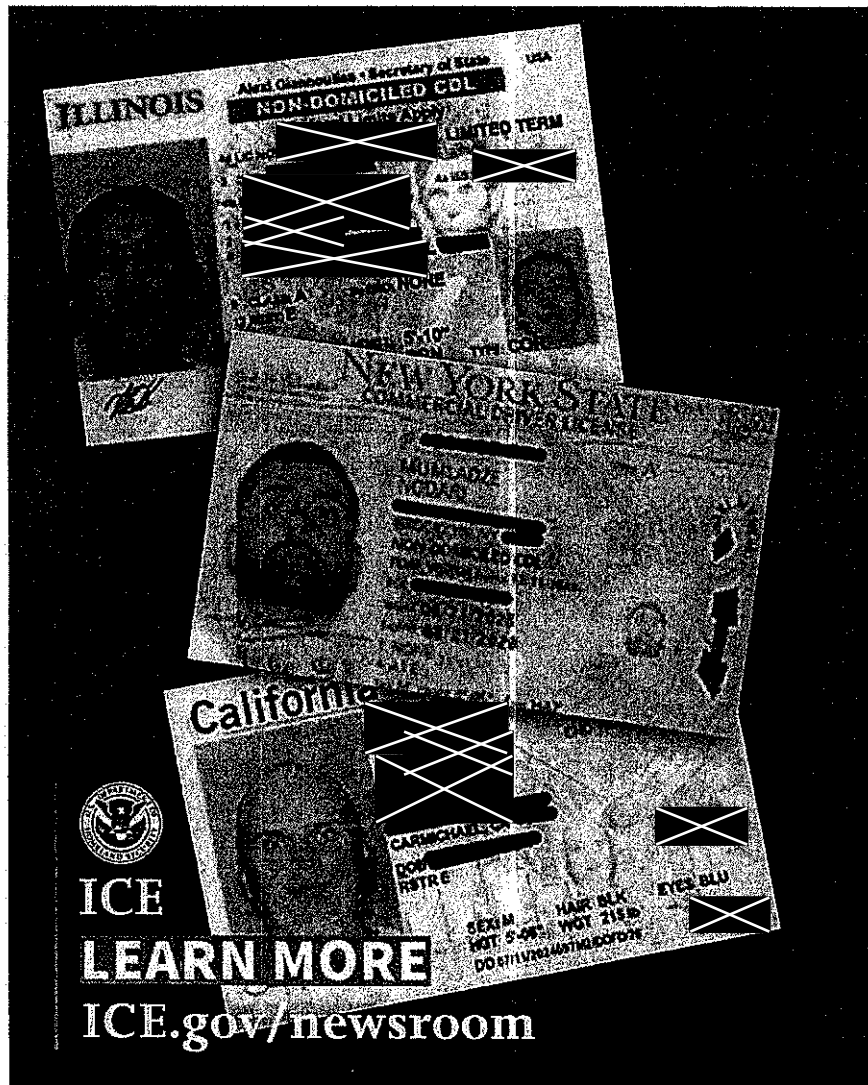


3 нояб. •

Working with Indiana State police as part of Operation Midway Blitz, we arrested 223 illegal aliens along Northwest Indiana highways since mid-September to clear the state's roadways of illegal aliens who create safety risks.

Many of the illegal aliens' CDLs were from states with sanctuary policies, including California, Illinois and New York.

Department of Homeland Security



Ваш комментарий...



Exhibit A - Pages 1 of 3

7:17



x.com



U.S. Immigration and Customs Enforcem...

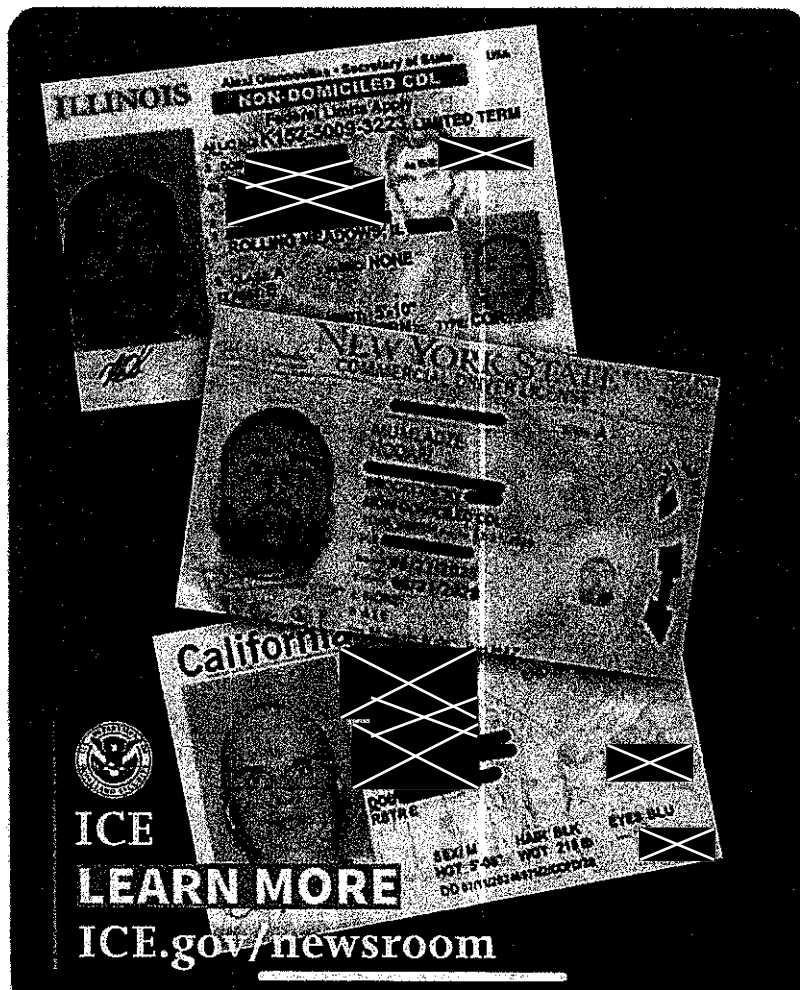
@ICEgov

Working with Indiana State police as part of Operation Midway Blitz, we arrested 223 illegal aliens along Northwest Indiana highways since mid-September to clear the state's roadways of illegal aliens who create safety risks.

Many of the illegal aliens' CDLs were from states with sanctuary policies, including California, Illinois and New York.

@DHSgov

Перевести пост



7:16

Chrome



U.S. Immigration and Custo... + Отслеживать

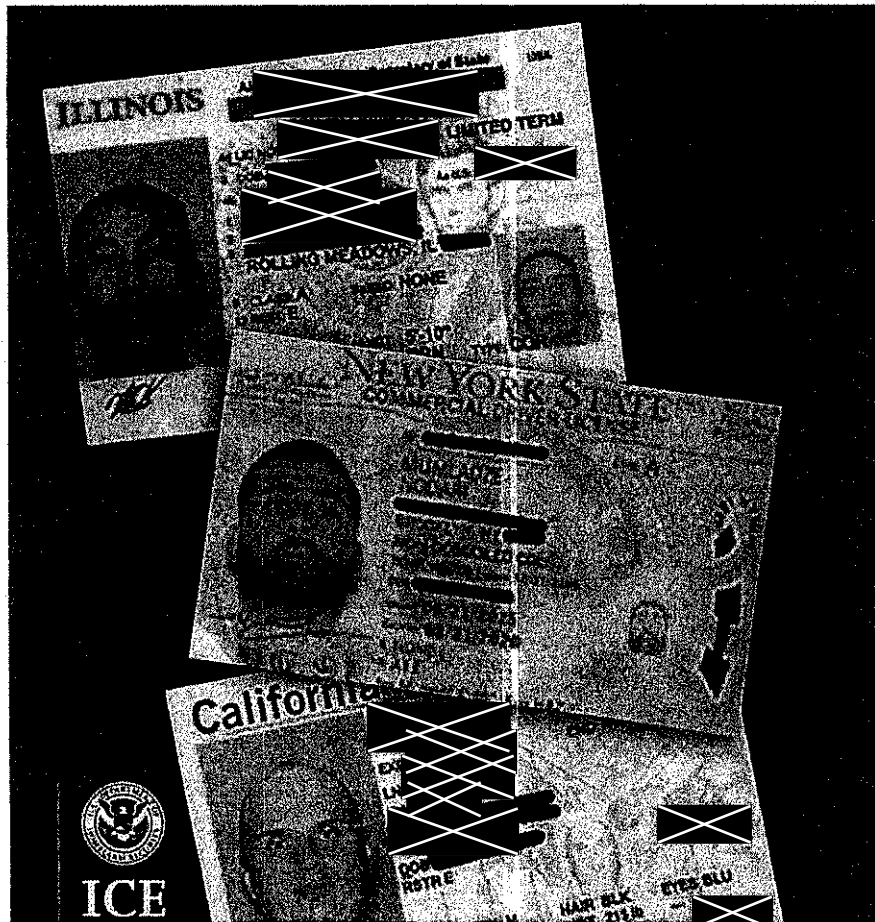
228 363 отслеживающих
1 мес. • 9

Working with Indiana State police as part of Operation Midway Blitz, we arrested 223 illegal aliens along Northwest Indiana highways since mid-September to clear the state's roadways of illegal aliens who create safety risks.

Many of the illegal aliens' CDLs were from states with sanctuary policies, including California, Illinois and New York.

U.S. Department of Homeland Security

Показать перевод



Поделитесь своими мыслями...



Главная



Сеть



Разместить



Уведомления



Вакансии

Exhibit A - Page 3 of 3

02/02/2022, 14:51

I-94 - Official Website

 For: ARTUR PETRIAKOV



Most Recent I-94

Admission (I-94) Record Number : 

Most Recent Date of Entry: 2021 September 29

Class of Admission : DT

Admit Until Date : 09/27/2022

Details provided on the I-94 Information form:

Last/Surname : PETRIAKOV

First (Given) Name : ARTUR

Birth Date : 

Document Number : 

Country of Citizenship : Russia

[Get Travel History](#)

► Effective April 30, 2012, DHS began automating the admission process. An alien lawfully admitted or paroled into the U.S. is no longer required to be in possession of a preprinted Form I-94. A record of admission printed from the CBP website constitutes a lawful record of admission. See 8 CFR § 1.4(d).

► If an employer, local, state or federal agency requests admission information, present your admission (I-94) number along with any additional required documents requested by that employer or agency.

► Note: For security reasons, we recommend that you close your browser after you have finished retrieving your I-94 number.

CBP Form I-94/4111
Expiration Date: 09/27/2022

[For inquiries or questions regarding your I-94, please click here](#)

[Accessibility](#) | [Privacy Policy](#)

<https://i94-cbp.dhs.gov/I94/#recent-results>

1/1

Exhibit C - Page 1 of 1

ASC Appointment Notice

APPLICATION NUMBER REQUEST NUMBER

12/04/2021

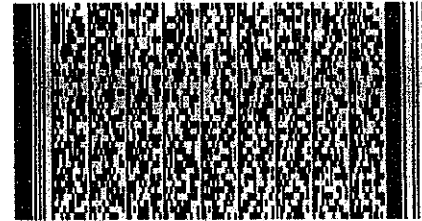
CASE TYPE

1589 - APPLICATION FOR ASYLUM AND FOR WITHHOLDING OF REMOVAL

ACCOUNT NUMBER**USCIS A#****CODE**

3

ARTUR PETERIAKOV



PLEASE READ THIS ENTIRE NOTICE CAREFULLY. To process your application, petition, or request, the U. S. Citizenship & Immigration Services (USCIS) must capture your biometrics. Please appear at the below Application Support Center (ASC) at the date and time specified.

WARNING: Unless USCIS excuses you based on good cause, failure to appear at this biometrics appointment will result in an applicant-caused delay that will impact your eligibility for employment authorization based on your pending asylum application. If you fail to appear at this appointment as scheduled, USCIS may: (1) dismiss your asylum application, if you are in lawful immigration status or paroled; or (2) refer your application to an immigration judge, if you are not in lawful immigration status or paroled. If you fail to appear at this appointment as scheduled, and you are currently in removal proceedings, an immigration judge may deem your asylum application abandoned.

APPLICATION SUPPORT CENTER

USCIS SACRAMENTO
825 Riverside Parkway Suite 100
West Sacramento CA 95605

DATE AND TIME OF APPOINTMENT

12/29/2021
08:00AM

WHEN YOU APPEAR AT THE ASC FOR BIOMETRICS SUBMISSION, YOU MUST BRING:

1. THIS APPOINTMENT NOTICE, and
2. PHOTO IDENTIFICATION (e.g. passport, valid driver's license, national ID, military ID, State-issued photo ID, or USCIS-issued photo ID). If you do not have photo identification, please expect a delay.

Only persons necessary to assist with transportation or completion of the biometrics worksheet should accompany you. If you have open wounds, bandages, or casts when you appear, USCIS may reschedule your ASC appointment if we determine your injuries may interfere with your biometrics submission. Please do not visit any USCIS office if you are sick or feel symptoms of being sick. Follow the instructions on this notice to reschedule your ASC appointment.

You may bring cell phones or electronic devices, but they must be turned off during biometrics collection. No one may photograph or record at an ASC.

For more information regarding your ASC appointment, visit <https://www.uscis.gov/forms/forms-information/preparing-your-biometric-services-appointment>. If you have questions regarding this notice, please call the USCIS Contact Center at 1-800-375-5283 (TTY 800-767-1833).

NOTE: If an ASC closes due to inclement weather or unforeseen circumstances, USCIS will automatically reschedule your ASC appointment for the next available date and time. For the latest information on the status of an office, visit <https://www.uscis.gov/about-us/uscis-office-closings>. Please check this page on the day of your ASC appointment. If USCIS reschedules your ASC appointment, you will receive a new ASC appointment notice.

You must update your address within 10 days if you move. For instructions, visit <https://www.uscis.gov/addresschange>. If you are in removal proceedings, you must also notify the Executive Office for Immigration Review (EOIR or Immigration Court) within five working days of any change of address or telephone number by filing a completed Form EOIR-33, Alien's Change of Address/Phone Number Form/Immigration Court. For instructions, visit <https://www.justice.gov/eoir/form-eoir-33-eoir-immigration-court-listing>.

WARNING: Failure to update your mailing address with USCIS, and, if applicable, EOIR may result in dismissal of your asylum application, referral of your asylum application to an immigration judge, or if you are already in removal proceedings, an entry of a removal order in your absence if you fail to appear at a hearing before an immigration judge.

REQUESTS TO RESCHEDULE/SPECIAL HANDLING

If you are unable to attend your scheduled ASC appointment, you may request that USCIS reschedule your ASC appointment by calling the USCIS Contact Center at 1-800-375-5283 (TTY 800-767-1833). Your request to reschedule should: 1) be made before the date and time of the original appointment and 2) establish good cause for rescheduling. If you fail to make a request before your scheduled appointment or fail to establish good cause, USCIS may not reschedule your ASC appointment.

If you have a serious ongoing medical condition and you cannot leave your home/hospital, you may request a mobile biometrics/homebound appointment by following the instructions on the back in the Notice for People with Disabilities or by visiting uscis.gov/accommodations.

BIOMETRICS PROCESSING STAMPASC SITE CODE. KFE

BIOMETRICS QA REVIEW BY:

591906 ON **DEC 29 2021**

TEMP INFO QA REVIEW BY:

ON **DEC 29 2021**

APPLICATION NUMBER 1589-

For questions about this notice call 1-800-375-5283. For questions about your application, contact the Asylum Office or Immigration Court with jurisdiction over your case.

Exhibit D - page 1 of 1

Marconi Gardens East

 LEASE CONTRACT CERTIFIED LEASE CALIFORNIA				
PARTIES AND LEASED PREMISES				
Owner Marconi Gardens East		Address [Redacted]		Phone [Redacted]
Residential Community Marconi Gardens East				
Street Address [Redacted]	City Carmichael	State California	ZIP [Redacted]	
Residents Artur Petriakov and Olga Petriakova				Leased Premises [Redacted]
Street Address [Redacted]	City Carmichael	State California	ZIP [Redacted]	
LEASE TERM				
Type ☐ Move-In ☒ Renewal	Length 1 year	Move-In Date 11/1/2021	Start Date 9/1/2025	End Date 8/31/2026
RENT				
Payable To Marconi Gardens East		Address [Redacted]		Phone [Redacted]
Usual Days and Hours When Rent May be Personally Paid Monday - Friday, 9 am - 5 pm		Due On 1st	Late Fee On 6th	Fax () -
CHARGES				
Failure to Clean Garbage Fine	\$175.00	Utilities (Late Setup)	\$25.00	Failure to Clean Animal Waste Charge
Online Payment Chargeback	\$25.00	Key Replacement Charge	\$35.00	Late Payment
Early Termination Fine	\$2,400.00	Parking Violation Charge	\$100.00	Dishonored Payment (After 1st)
Lock Change Charge	\$40.00	Dishonored Payment	\$25.00	Smoke/CO Alarm Tampering Charge
Failure to Clean Garbage Charge	\$175.00	Window Screen Replacement	\$35.00	
MONTHLY PAYMENTS		DEPOSITS		
Base Rent	\$1,450.00	Security Deposit	\$1,000.00	
Carport Rent	\$50.00	TOTAL REFUNDABLE SECURITY DEPOSITS	\$1,000.00	
water/sewer/trash	\$100.00			
TOTAL MONTHLY PAYMENT	\$1,600.00			

THIS RESIDENTIAL LEASE CONTRACT (this "Agreement" or "Lease") is made and entered into as of the 12th day of August, 2025, by and between Owner of Residential Community ("Owner") and Artur Petriakov and Olga Petriakova, jointly and severally (hereinafter collectively "Residents"). Owner hereby leases to Residents the premises at 4800 Marconi Ave #105, Carmichael, CA 95608 (the "Leased Premises"), located within Marconi Gardens East (the "Residential Community"), for use exclusively as a private residence, and not for any other purpose, except as specifically mandated by applicable law. The Leased Premises may also include the right to rent additional features such as parking spaces, storage and garage spaces, which, if applicable, will be designated and included in a separate written agreement or addendum to this Agreement. Residents' performance of their obligations contained in this Agreement may be guaranteed by a third party. Any third-party guarantee agreements may be included with and attached to this Agreement, but such third party will not have a right to possession of the Leased Premises. Owner's representatives, agents, affiliates, successors, assigns, employees, officers, and directors ("Owner's Related Parties") are hereby incorporated by reference to benefit from any and all waivers, releases, and limitations of liability made by Residents hereunder, but are not personally responsible for any of Owner's obligations under

Exhibit E - page 1 of 1

СВИДЕТЕЛЬСТВО О ЗАКЛЮЧЕНИИ БРАКА

Петряков
фамилия
Артур Викторович
имя, отчество
гражданин России
гражданство
русский

 национальность (вписывается, если указана в записи акта о заключении брака)
  г.
дата рождения

г. Ленинград, РСФСР

Петрова
фамилия

Ольга Олеговна
имя, отчество
гражданка России
гражданство
русская

 национальность (вписывается, если указана в записи акта о заключении брака)
  г.
дата рождения

г. Ленинград, РСФСР

заключили брак **19/05/2012**
число, месяц, год (цифрами и прописью)

девятнадцатого мая две тысячи двенадцатого года

о чем **2012** года **мая** месяца **19** числа

составлена запись акта о заключении брака № 

После заключения брака присвоены фамилии:

мужу **Петряков**

жене **Петрякова**

Место государственной регистрации **Отдел регистрации актов**

гражданского состояния о браке - дворец бракосочетания №4

уполномоченные органы записи актов гражданского состояния
по делам ЗАГС Правительства Санкт-Петербурга

Дата выдачи «**19**» **мая** **2012** г.

Руководитель органа
записи актов гражданского состояния


Е.И. Дубченко

Гознак, МПФ, Москва, 2011, «В».



Exhibit F - page 10 of 2

(Translation from Russian into English)

CERTIFICATE of MARRIAGE

Petriakov

last name

Artur Viktorovich

first name and patronymic

Citizen of Russia

Citizenship

Russian

Nationality (if noted in the Marriage Register)

 Date of birth

 RSFSR

Place of birth

Petrova

last name

Olga Olegovna

first name and patronymic

Citizen of Russia

Citizenship

Russian

Nationality (if noted in the Marriage Register)

 birth

 RSFSR

Place of birth

united in marriage on

May 19, 2012

on the nineteenth of May, year of two thousand and twelve

in witness whereof a record of marriage No.  was made

on this 19th day of May, 2012

After conclusion of the marriage the spouses were given the following last names:

Husband Petriakov

Wife Petriakova

Place of official registration the Civil Marriage Registry Office - Marriage

Registration Hall No. 4 of the Committee for matters concerning Civil Registry of the

Government of Saint Petersburg city

title of the Civil Registry Office

Date of issue May 19, 2012

Chief of the Civil Registry Office

(Signature)

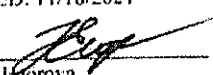
E.I. Dubchenko

(Seal): The Government of Saint Petersburg city * The Committee for Matters concerning Civil
Registry * The Civil Registry Office - Marriage Registration Hall No. 4



I, Elina Egorova, hereby certify that I am competent to translate from Russian
language into English, and I translated the Certificate of Marriage written in Russian language into English. The
submitted the English document are a complete and accurate translation of the Russian document.

DATED: 11/18/2021


Elina Egorova

5941 San Juan Ave., Suite 12B, Citrus Heights, CA 95610

Exhibit F - page 20 of 2

DECLARATION OF OLGA PETRIAKOVA

I, Olga Petriakova, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge:

- 1. I am the lawful wife of Artur Petriakov. We have been married and living together in the United States as a family.**
- 2. Prior to his detention, my husband and I lived together in California. He worked lawfully, complied with all laws, and was the primary source of income for our household.**
- 3. Since my husband's detention by U.S. Immigration and Customs Enforcement (ICE), our family has experienced severe financial hardship. I have struggled to cover basic living expenses, including rent, utilities, and daily necessities.**
- 4. My husband's detention has also caused significant emotional distress. I am deeply concerned about his mental health, as he has a history of mental health conditions that have worsened during detention.**
- 5. During our communications, my husband has described severe anxiety, panic symptoms, difficulty sleeping, and emotional instability. I fear that continued detention is causing him serious and lasting psychological harm.**
- 6. Based on my knowledge of my husband and our life together, he does not pose a danger to the community and is not a flight risk. He has always lived peacefully, respected the law, and maintained strong family and community ties.**
- 7. If released, my husband would immediately return to our shared residence and would fully comply with any conditions imposed by the Court or immigration authorities.**
- 8. My husband's continued detention has placed an overwhelming emotional and financial burden on our family, and his release is critically important to our stability and well-being.**

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

Executed on December, 31, 2025
at Sacramento, California



Olga Petriakova

Exhibit 6 - page 10 of 1

DECLARATION OF ARTUR PETRIAKOV

I, Artur Petriakov, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge:

1. I am currently detained by U.S. Immigration and Customs Enforcement (ICE) at the El Paso Processing Center in El Paso, Texas.

2. I have been continuously detained since October 23, 2025. Since the time of my detention, I have not been provided with any bond hearing before an Immigration Judge. No bond hearing has ever been scheduled or conducted in my case.

3. The absence of a bond hearing is not the result of any waiver or refusal on my part. At no time was I informed of any meaningful procedure to challenge the necessity of my continued detention or to seek release.

4. Prior to my detention, I was diagnosed with mental health conditions and was prescribed Prozac (fluoxetine). I was stable and able to function normally while living and working in the community.

5. Since my detention, my mental health has significantly deteriorated. I experience severe anxiety, panic symptoms, difficulty sleeping, and persistent emotional distress. Despite being prescribed medication, my condition has worsened in the detention environment.

6. The conditions of detention have made it extremely difficult to manage my mental health. The facility does not provide individualized or adequate mental health treatment, and I often feel overwhelmed, isolated, and unable to recover in a custodial setting.

7. Continued detention causes me ongoing psychological harm and has negatively affected my ability to think clearly, rest, and maintain emotional stability. I fear that remaining in detention will further worsen my mental health and cause lasting harm.

8. Prior to my detention, I lived peacefully in the United States with my wife, worked lawfully, and complied with all laws. I have no criminal history and do not pose a danger to the community or a flight risk.

9. Detention has also caused serious hardship to my family. I was the primary source of income for my household, and my continued confinement has created significant financial and emotional strain.

10. Based on my personal experience, continued detention without any individualized custody review is extremely difficult to endure and is causing me ongoing and irreparable harm.

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

Executed on December, 31, 2025⁻
at the El Paso Processing Center in El Paso, Texas.



Artur Petriakov

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

NOTICE TO EOIR: ALIEN ADDRESS

Event No: 

Date: November 18, 2025

To: Enter Name of BIA or Immigration Court I-830 EOIR SPC El Paso, TX

Enter BIA or Immigration Court Three Letter Code@usdoj.gov EPD

From: Enter Name of ICE Office ERO - El Paso, TX SPC Sub-Office

Enter Street Address of ICE Office U.S. IMMIGRATION & CUSTOMS ENFORCEMENT DRO - El Paso, TX
SPC Sub-Office 8915 MONTANA AVENUE

Enter City, State and Zip Code of ICE Office EL PASO, TX 79925

Respondent: Enter Respondent's Name PETRIAKOV, ARTUR

Alien File No: Enter Respondent's Alien Number 

This is to notify you that this respondent is:

☐ Currently incarcerated by federal, state or local authorities. A charging document has been served on the respondent and an Immigration Detainer-Notice of Action by the ICE (Form I-247) has been filed with the institution shown below. He/she is incarcerated at:

Enter Name of Institution where Respondent is being detained _____

Enter Street Address of Institution where Respondent is being detained _____

Enter City, State and Zip code of Institution where Respondent is being detained _____

Enter Respondent's Inmate Number _____

His/her anticipated release date is Enter Respondent's Anticipated Release Date. _____

☐ Detained by ICE on Enter Date Respondent was Detained by ICE at: October 23, 2025

Enter Name of ICE Detention Facility where Respondent is being detained _____

Enter Street Address of ICE Detention Facility where Respondent is being detained _____

Enter City, State and Zip Code of ICE Detention Facility where Respondent is being detained _____

☒ Detained by ICE and transferred on Enter Date Respondent was transferred to: October 24, 2025

Enter Name of ICE Detention Facility where Respondent has been transferred EL PASO SPC

Enter Street Address of ICE Detention Facility where Respondent has been transferred 8915 MONTANA AVE

Enter City, State and Zip Code of ICE Detention Facility where Respondent has been transferred EL PASO, TX 79925

☐ Released from ICE custody on the following condition(s):

- ☐ Order of Supervision or Own Recognizance (Form I-220A)
- ☐ Bond in the amount of Enter Dollar Amount of Respondent's Bond
- ☐ Removed, Deported, or Excluded
- ☐ Other _____

Upon release from ICE custody, the respondent reported his/her address and telephone number would be:

Enter Respondent's Street Address _____

Enter Respondent's City, State and Zip Code _____

Enter Respondent's Telephone Number (including area code) _____

☐ I hereby certify that the respondent was provided an EOIR-33 Form and notified that they must inform the Immigration Court of any further change of address.

ICE Official: Enter Your First, Last Name and Title Deportation Officer J 7085 MENDES

DECLARATION OF ARTUR PETRIAKOV

REGARDING ABSENCE OF BOND HEARING AND LACK OF NOTICE

I, Artur Petriakov, declare under penalty of perjury that the following statements are true and correct to the best of my knowledge:

1. I am currently detained by U.S. Immigration and Customs Enforcement (ICE) at the El Paso Processing Center in El Paso, Texas.
2. Since the time of my detention, I have not been provided with any bond hearing before an Immigration Judge. No bond hearing has ever been scheduled or conducted in my case.
3. At no point was I informed by ICE, DHS, or any government official that I had the ability to request a bond hearing or any other individualized custody review.
4. I was not advised of any procedures, deadlines, or mechanisms by which I could seek release from detention or challenge the necessity of my continued detention.
5. I did not knowingly or voluntarily waive any right to a bond hearing or to an individualized custody determination.
6. The absence of a bond hearing in my case is not the result of any refusal, omission, or inaction on my part, but rather the result of DHS's failure to provide constitutionally adequate procedures to assess the necessity of my continued detention.

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

Executed on December, 31, 2025
at the El Paso Processing Center in El Paso, Texas.



Artur Petriakov

Exhibit J - page 1 of 1

United States District Court
Western District of Texas
El Paso Division

Re: Artur Petriakov, A-Number: 

Date: 10/23/2025

To the Honorable Court,

My name is Igor Marinov, and I am the president of Genesis Freight Corp.

Artur Petriakov contracted with our company as Commercial Truck Driver from 09/20/2025 to 10/13/2025 (the date he was detained). During the period of our contract, he demonstrated that he was responsible, reliable, and respectful. He consistently arrived on time, followed all worksite policies, and completed his contracted duties diligently.

At no point during our working relationship did Artur Petriakov exhibit any behavior that would suggest that he is a danger to others or unable to comply with rules and instructions.

Based on our experience, we believe that Artur Petriakov is a trustworthy individual who takes his responsibilities seriously. If he is released from detention, we would be willing to continue the contracting with him, subject to applicable requirements.

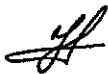
We are aware that Artur Petriakov is currently detained by Immigration and Customs Enforcement. We respectfully ask the Court to consider this letter in evaluating his request for release or bond.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,

Igor Marinov / President

Signature



GENESIS FREIGHT CORP

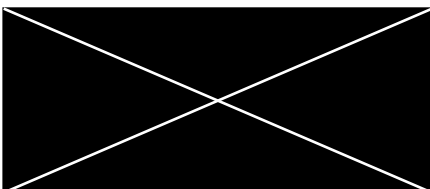


Exhibit K - page 10 of 2

United States District Court
Western District of Texas
El Paso Division

Re: Artur Petriakov, A-Number: 
To the Honorable Court,

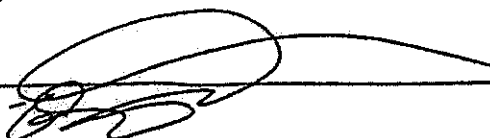
My name is Gheorghe Paladi, and I am the owner of Paladium Transportation Inc. Artur Petriakov was employed with our company as an independent contractor from 02/22/2024 to 03/10/2024. During his employment, he demonstrated that he was responsible, reliable, and respectful. He consistently arrived on time, followed workplace rules, and performed his duties diligently.

At no point during his employment did Artur Petriakov exhibit any behavior that would suggest that he is a danger to others or unable to comply with rules and instructions. Based on our experience, we believe that Artur Petriakov is a trustworthy individual who takes his responsibilities seriously. If he is released from detention, we would be willing to consider rehiring him, subject to applicable requirements.

We are aware that Artur Petriakov is currently detained by Immigration and Customs Enforcement. We respectfully ask the Court to consider this letter in evaluating his request for release or bond.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,

Signature 

Printed Name : Gheorghe Paladi

Title / Position: President

Company Name: PALADIUM TRANSPORTATION INC.

Company Address: 24821 W Easy St, Plainfield, IL 60586

Phone Number 

Date: 12/23/2025

United States District Court
Western District of Texas
El Paso Division

Re: Artur Petriakov, A-Number: [REDACTED]
To the Honorable Court,

My name is Ivan Vinogradov. I am over 18 years old and reside at [REDACTED]
Orangevale, California, [REDACTED]

I have known Artur Petriakov since October 2021. I am writing this letter in support of his request for release or bond.

During the time I have known him, Artur Petriakov has consistently demonstrated that he is a responsible, peaceful, and trustworthy person. He has never exhibited violent behavior or posed any danger to others.

I am aware that Artur Petriakov is currently detained by Immigration and Customs Enforcement. Based on my knowledge of his character and conduct, I do not believe that he poses any risk to the community or any risk of failing to appear at future court hearings.

If released, I am willing to provide support to Artur Petriakov, including emotional support and assistance with transportation, housing, and compliance with court and ICE requirements, if needed.

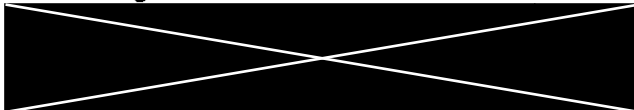
I respectfully ask the Court to consider this letter in evaluating Artur Petriakov's request for release or bond.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,



Ivan Vinogradov



12.22.2025

United States District Court
Western District of Texas
El Paso Division

Re: Artur Petriakov, A-Number: [REDACTED]
To the Honorable Court,

My name is Olga Vinogradova. I am over 18 years old and reside at [REDACTED]
Orangevale, California, [REDACTED]

I have known Artur Petriakov since October 2021. I am writing this letter in support of his request for release or bond.

During the time I have known him, Artur Petriakov has consistently demonstrated that he is a responsible, peaceful, and trustworthy person. He has never exhibited violent behavior or posed any danger to others.

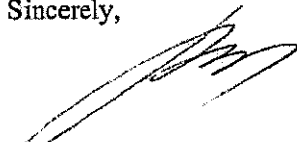
I am aware that Artur Petriakov is currently detained by Immigration and Customs Enforcement. Based on my knowledge of his character and conduct, I do not believe that he poses any risk to the community or any risk of failing to appear at future court hearings.

If released, I am willing to provide support to Artur Petriakov, including emotional support and assistance with transportation, housing, and compliance with court and ICE requirements, if needed.

I respectfully ask the Court to consider this letter in evaluating Artur Petriakov's request for release or bond.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Sincerely,


Olga Vinogradova

[REDACTED]

12.22.2025

Exhibit L - page 2 of 2

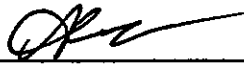
CERTIFICATE OF SERVICE

I hereby certify that on this 31 day of December, 2025,

I served a true and correct copy of the foregoing Petition for Writ of Habeas Corpus
and all attached exhibits by depositing the same in the United States Mail,
postage prepaid, addressed to:

United States Attorney's Office
Western District of Texas
El Paso Division
700 E. San Antonio Avenue, Suite 200
El Paso, TX 79901

Respectfully submitted,



Artur Petriakov
Petitioner (Pro se)