UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

PRINCE OFORI-ATTAH :

Petitioner, :

-against- :

LUIS SOTO, *in his official capacity as* Warden of the Delaney Hall Detention Center

JONATHAN FLORENTINO, ACTING NEWARK FIELD OFFICE DIRECTOR, ENFORCEMENT AND REMOVAL OPERATIONS, U.S. IMMIGRATION AND CUSTOMS ENFORCEMENT (ICE);

TODD LYONS, In His Official Capacity As Acting Director, United States Immigration and Customs Enforcement (ICE);

KRISTI NOEM, IN HER OFFICIAL CAPACITY AS SECRETARY OF THE UNITED STATES DEPARTMENT OF HOMELAND SECURITY;

Respondents. :

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PETITION FOR WRIT OF HABEAS CORPUS

Case No.

PRELIMINARY STATEMENT

1. This case challenges the unlawful and indefinite re-detention under a new and erroneous interpretation of the Immigration and Nationality Act ("INA"). Petitioner Prince Ofori-Attah is detained without the possibility of bond solely because the Department of Homeland Security ("DHS") and the Executive Office for Immigration Review ("EOIR") have chosen to treat him as if he were an "arriving" and present at the border, even though they had already processed him pursuant to parole under 212(d)(5) at his initial encounter. ICE's misapplication of 8 U.S.C. § 1225(b)(2)(A) and the Board of Immigration Appeals' recent decision in *Matter of Yajure Hurtado,* have stripped Petitioner-and thousands of similarly situated individuals-of the bond hearings guaranteed by § 1226(a).

INTRODUCTION

2. Petitioner, Prince Ofori-Attah ("Mr. Ofori-Attah"), is a twenty-nine-year-old citizen and national of Ghana, who is charged with having entered the United States without admission or inspection. See 8 U.S.C. § 1182(a)(6)(A)(i). He was initially paroled into the United States under a 212(d)(5) parole in July 10, 2022, after he fled Ghana due to harm suffered. Mr. Ofori-Attah is married to a U.S. citizen, and his wife has filed a pending Form I-130, Petition for Alien Relative on his behalf. Together, they share a newborn infant.

3. Nonetheless, in October 2022, while Petitioner was working, he was re-arrested, and this time, Respondents seek to detain him without the possibility of bond.

4. Petitioner's case is currently on appeal at the Board of Immigration Appeals,

and he does not have a final order.

5. Petitioner requests that this Court release him from custody, or alternatively, shift the burden to the government to prove why he is a flight risk or danger to the community to justify continued detention.

CUSTODY

1. Petitioner is currently in the custody of ICE at the Delaney Hall Facility. *See* ICE Detainee Locator Results, Exhibit A. He is therefore in "'custody' of the Department of Homeland Security, ICE, within the meaning of the habeas corpus statute." *Jones v. Cunningham*, 371 U.S. 236, 243 (1963).

JURISDICTION

2. This court has jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause), and the Immigration and Nationality Act ("INA"), 8 U.S.C. § 1101 et. seq.
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., the All Writs Act, 28 U.S.C. § 1651, and the Immigration and Nationality Act, 8 U.S.C. § 1252(e)(2).
4. Federal district courts have jurisdiction to hear habeas claims by non-citizens challenging both the lawfulness and the constitutionality of their detention. *See Zadvydas v. Davis*, 533 U.S. 678, 687 (2001).

REQUIREMENTS OF 28 U.S.C. §§ 2241, 2243

5. The Court must grant the petition for writ of habeas corpus or issue an order to show cause ("OSC") to Respondents "forthwith," unless Petitioner is not entitled to relief. *See* 28 U.S.C.

§ 2243. If an OSC is issued, the Court must require Respondents to file a return "within three days unless for good cause additional time, not exceeding twenty days, is allowed." *Id.*

6. Petitioner is "in custody" for the purpose of § 2241 because he was arrested and remains detained by Respondents.

VENUE

7. Venue is properly before this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees or officers of the United States acting in their official capacity and because a substantial part of the events or omissions giving rise to the claim occurred in the District of New Jersey. Petitioner is under the jurisdiction of ICE's Newark Field Office, and he is currently detained in Delaney Hall, in Newark, New Jersey. *See* Exhibit A.

EXHAUSTION OF ADMINISTRATIVE REMEDIES

8. Administrative exhaustion is unnecessary as it would be futile. *See, e.g., Aguilar v. Lewis*, 50 F. Supp. 2d 539, 542–43 (E.D. Va. 1999).

9. It would be futile for Petitioner to seek a custody redetermination hearing before an IJ because of the BIA's recent decision holding that anyone who has entered the U.S. without inspection is now considered an "applicant for admission" who is "seeking admission" and therefore subject to mandatory detention under § 1225(b)(2)(A). *See Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025); *see also Zaragoza Mosqueda v. Noem*, 2025 WL 2591530, at *7 (C.D. Cal. Sept. 8, 2025) (noting that BIA's decision in *Yajure Hurtado* renders exhaustion futile).

10. Additionally, the agency does not have jurisdiction to review Petitioner's claim of unlawful custody in violation of his due process rights, and it would therefore be futile for him to pursue administrative remedies. *Reno v Amer.-Arab Anti-Discrim. Comm.*, 525 U.S. 471, 119 S.Ct.

936, 142 L.Ed.2d 940 (1999) (finding exhaustion to be a "futile exercise because the agency does not have jurisdiction to review" constitutional claims).

PARTIES

11. Petitioner Mr. Ofori-Attah is a twenty-nine-year-old citizen and national of Ghana. He resides with his U.S. citizen wife and a newborn U.S. citizen child at [redacted] Petitioner has been in ICE custody since about October 9, 2025, at the Delaney Hall Detention Facility, 451 Doremus Avenue, Newark, New Jersey, 07105.

12. Respondent John Soto is sued in his official capacity as Warden of the Delaney Hall Facility, located at 451 Doremus Ave., Newark, NJ 07105. In his official capacity, John Soto is the Petitioner's immediate custodian.

13. Respondent Jonathan Florentino is named in his official capacity as the Acting Director of the Newark, NJ, Field Office of Enforcement and Removal Operations (ERO), U.S. Immigration and Customs Enforcement (ICE). Respondent Florentino is a legal custodian of the Petitioner and has the authority to release him.

14. Respondent Todd M. Lyons is named in his official capacity as the Acting Director of ICE. He administers and enforces the immigration laws of the United States, routinely conducts business in the District of New Jersey, is legally responsible for pursuing efforts to remove the Petitioner, and as such is the custodian of the Petitioner. At all times relevant hereto, Respondent Lyons's address is ICE, Office of the Principal Legal Advisor, 500 12th St. SW, Mail Stop 5900, Washington DC 20536-5900.

15. Respondent Kristi Noem is named in her official capacity as the Secretary of Homeland Security in the United States Department of Homeland Security. In this capacity, she is

responsible for the administration of immigration laws pursuant to Section 103(a) of the INA, 8 U.S.C. § 1103(a) (2007); routinely transacts business in the District of New Jersey; is legally responsible for pursuing any effort to detain and remove the Petitioner; and as such is a custodian of the Petitioner. At all times relevant hereto, Respondent Noem's address is U.S. Department of Homeland Security, Office of the General Counsel, 2707 Martin Luther King Jr. Ave. SE, Washington, DC 20528-0485.

LEGAL BACKGROUND

16. Section 2241 of 28 United States Code provides in relevant part that "[w]rits of habeas corpus may be granted by . . . the district courts within their respective jurisdictions" when a petitioner "is in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(a), (c)(3); *see also* I.N.S. v. St. Cyr, 533 U.S. 289, 305, 121 S. Ct. 2271 (2001).

17. District courts grant writs of habeas corpus to those who demonstrate their custody violates the Constitution or laws of the United States. 28 U.S.C. § 2241(c)(3).

18. Habeas corpus "entitles [a] prisoner to a meaningful opportunity to demonstrate that he is being held pursuant to 'the erroneous application or interpretation' of relevant law." *Boumediene v. Bush*, 553 U.S. 723, 779, 128 S. Ct. 2229 (2008) (*quoting*, *St. Cyr*, 533 U.S. at 302.

19. The Fifth Amendment's Due Process Clause protects the right of all persons to be free from "depriv[ation] of life, liberty, or property, without due process of law." U.S. Const. amend. V.

20. "It is well established that the Fifth Amendment entitles aliens to due process of law[.]" *Trump v. J. G. G.*, 604 U.S. ---, 145 S. Ct. 1003, 1006 (2025) (*quoting Reno v. Flores*, 507 U.S. 292, 306, 113 S. Ct. 1439 (1993)).

21. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause protects." *Zadvydas*, 533 U.S. at 690.

22. The INA prescribes three basic mechanisms for detention for non-citizens, 8 U.S.C. § 1225, for arriving aliens and applicants for admission, § 1226 the default detention statute, and § 1231 for post–final order detention.

23. The detention provisions at § 1226(a) and § 1225(b)(2) were enacted as part of the Illegal Immigration Reform and Immigrant Responsibility Act ("IIRIRA") of 1996, Pub. L. No. 104-208. Div. C, §§ 302-03, 110 Stat. 3009-546, 300-582 to 3009-583, 3009-585. Section 1226 was most recently amended earlier this year by the Laken Riley Act, Pub. L. No. 119-1, 139 Stat. 3 (2025).

24. Following the enactment of the IIRIRA, the U.S. Department of Justice's Executive Office of Immigration Review ("EOIR") drafted new regulations explaining that, in general, people who entered the country without inspection were not considered detained under § 1225 and that they were instead detained under § 1226(a). *See* Inspection and Expedited Removal of Aliens; Detention and Removal of Aliens; Conduct of Removal Proceedings; Asylum Procedures, 62 Fed. Reg. 10312, 10323 (Mar. 6, 1997) ("Despite being applicants for admission, aliens who are present without having been admitted or paroled (referred to as aliens who entered without inspection) will be eligible for bond and bond redetermination").

25. Thus, in the decades that followed, most people who entered without inspection and were thereafter detained and placed in standard removal proceedings were considered for release on bond and also received bond hearings before an Immigration Judge ("IJ"), unless their criminal history rendered them ineligible. That practice was consistent with

many more decades of prior practice, in which noncitizens who had entered the United States, even if without inspection, were entitled to a custody hearing before an IJ or other hearing officer. In contrast, those who were stopped at the border were only entitled to release on parole. *See* 8 U.S.C. § 1252(a) (1994); see also H.R. Rep. No. 104-469, pt. 1, at 220 (1996) (noting that § 1226(a) simply "restates" the detention authority previously found at § 1252(a)).

26. For decades, residents of the U.S. who entered without inspection and were subsequently apprehended by ICE in the interior of the country have been detained pursuant to § 1226 and entitled to bond hearings before an IJ, unless barred from doing so due to their criminal history.

27. On July 8, 2025, however, DHS stated a new position with regard to custody determinations as follows:

> An "applicant for admission" is an alien present in the United States who has not been admitted or who arrives in the United States, whether or not at a designated port of arrival. INA § 235(a)(1). **Effective immediately, it is the position of DHS that such aliens are subject to detention under INA § 235(b) and may not be released from ICE custody except by INA § 212(d)(5) parole**. These aliens are also ineligible for a custody redetermination hearing ("bond hearing") before an immigration judge and may not be released for the duration of their removal proceedings absent a parole by DHS. For custody purposes, these aliens are now treated in the same manner that "arriving aliens" have historically been treated. **The only aliens eligible for a custody determination and release on recognizance, bond, or other conditions under INA § 236(a) during removal proceedings are aliens admitted to the United States and chargeable with deportability under INA § 237, with the exception of those subject to mandatory detention under INA § 236(c).**
>
> Moving forward, ICE will not issue Form I-286, Notice of Custody Determination, to applicants for admission because Form I-286 applies by its terms only to custody determinations under INA § 236 and part 236 of Title 8 of the Code of Federal Regulations. With a limited exception for certain habeas petitioners, on which the Office of the Principal Legal Advisor (OPLA) will individually advise, if Enforcement and Removal Operations (ERO) previously conducted a custody determination for an applicant for admission still detained in ICE custody, ERO will affirmatively cancel the Form I-286. *See* https://www.aila.org/ice-memo-interim-guidance-regarding-detention-authority-

forapplications-for-admission (emphasis original).

28. As a result, according to DHS, all noncitizens who have entered the United States without inspection and are subject to the grounds of inadmissibility, including long-time U.S. residents, are now considered to be subject to mandatory detention under INA § 235(b) and ineligible for release on bond. Conversely, according to DHS "[t]he only aliens eligible for a custody determination and release on recognizance, bond, or other conditions under INA § 236(a) during removal proceedings are aliens admitted to the United States and chargeable with deportability under INA § 237, with the exception of those subject to mandatory detention under INA § 236(c)." *Id.*

29. Prior to July 8, 2025, the predominant form of detention authority for anyone arrested in the interior of the United States was 8 U.S.C. § 1226(a). Further, the Petitioner in this case was initially arrested and released pursuant to 8 U.S.C. § 1226(a), and is demonstrated by DHS's own forms.

30. The Supreme Court has explained that § 1225(b) is concerned "primarily [with those] seeking entry," and is generally imposed "at the Nation's borders and ports of entry, where the Government must determine whether [a noncitizen] seeking to enter the country is admissible." *Jennings v. Rodriguez*, 583 U.S. 281, 297, 2987 (2018). In contrast, Section 1226 "authorizes the Government to detain certain aliens *already in the country* pending the outcome of removal proceedings." *Id.* at 289 (emphases added).

31. Under § 1226(a) the Attorney General may release a detainee on bond on the authority of ICE or by an Immigration Judge. There are standards for release: bond is available if the Supreme Court has explained that § 1225(b) is concerned "primarily [with those] seeking entry," and is generally imposed "at the Nation's borders and ports of entry, where the Government must determine whether [a noncitizen] seeking to enter the

country is admissible." *Jennings v. Rodriguez*, 583 U.S. 281, 297, 2987 (2018). In contrast, Section 1226 "authorizes the Government to detain certain aliens *already in the Furthermore, § 1225(b)(2) specifically applies only to those "seeking admission," and the implementing regulations at 8 C.F.R. § 1.2 address noncitizens who are "coming or attempting to come into the United States." The use of the present progressive tense would exclude noncitizens like Petitioner who are apprehended in the interior years after they entered, as they are no longer "seeking admission" or "coming [...] into the United States." See Martinez v. Hyde, 2025 WL 2084238 at *6 (D. Mass. July 24, 2025) (citing the use of present and present progressive tense to support conclusion that INA § 1225(b)(2) does not apply to individuals apprehended in the interior); see also Al Otro Lado v. McAleenan, 394 F. Supp. 3d 1168, 1200 (S.D. Cal. 2019) (construing "is arriving" in INA § 235(b)(1)(A)(i) and observing that "[t]he use of the present progressive, like use of the present participle, denotes an ongoing process").*

32. Accordingly, the mandatory detention provision of § 1225(b) does not apply to Petitioner, who had entered the U.S. approximately 3 years before he was re-arrested while he was working in New Jersey.

STATEMENT OF THE FACTS

33. Petitioner, Prince Ofori-Attah is a twenty-nine-year-old male and upon information and belief, without a criminal history[we do not have info on file of any criminal history in the United States.

34. Petitioner is a native and citizen of Ghana.

35. He entered the United States on or about July 10, 2022, at or near Calexico, CA, Port of Entry.

36. On July 28, 2022, Mr. Ofori-Attah was given a credible fear interview, he was found credible and he did appear to be subject to a bar (s) to asylum or withholding of removal.

37. The Notice to Appear dated August 3, 2022, charges Petitioner as a noncitizen who was not admitted or paroled pursuant to 8 U.S.C. § 1182(a)(6)(A)(i), as someone who was not admitted or paroled, and ordered him to appear before the Immigration Court at Imperial, 1572 Gateway Rd., Calexico, CA 92231, on August 23, 2022, at 8:00 AM.

38. On or about September 9, 2022, DHS conducted a danger and flight risk assessment released Petitioner with a 212(d)(5) parole into the United States, necessarily determining that he did not pose a danger to the community or a risk of flight.

39. On September 12, 2022, Mr. Ofori-Attah was paroled out of custody under INA § 212(d)(5)(A). He never violated the terms of his parole.

40. Following his release, Petitioner traveled to Chicago, IL, complied with all conditions imposed by DHS, and reported as required.

41. Petitioner filed his asylum application.

42. Petitioner also applied for and was granted employment authorization. He has remained in compliance with all immigration requirements, including appearing for all scheduled court hearings and DHS appointments.

43. Petitioner entered into a legal marriage with his U.S. Citizen wife, Maisarah Abdulai, on April 1, 2024, in Newark, NJ.

44. Mr. Ofori-Attah filed Form I-130 on October 18, 2024, prior to his arrest. It remains pending with USCIS, but when granted, Mr. Ofori-Attah is eligible to adjust status to a lawful permanent resident.

45. Shortly before his re-arrest, on [redacted] Petitioner and his wife became parents of their U.S. citizen daughter, N[redacted] She was about one month when Petitioner was re-arrested.

46. Since April 2024, Mr. Ofori-Attah and his family have resided at [redacted]

47. Mr. Ofori-Attah was re-arrested by DHS at the Newark airport, where he worked in October 2025, despite having violated no condition of his prior release and despite his consistent compliance with DHS and Immigration Court requirements.

48. On December 8, 2025, Petitioner had to choose between being removed to Ghana, a country he had never been to, or to voluntarily depart. The immigration court would not wait for USCIS to adjudicate his Form I-130, or have them expedite the decision, which would lead to status. Petitioner felt pressured to take Voluntary Departure.

49. On January 7, Petitioner appealed that decision and it is currently pending at the Board of Immigration Appeals.

50. Petitioner remains in DHS custody at Delaney Hall Detention Facility at 451 Doremus Ave., Newark, NJ 07105.

51. Since his re-detention, Petitioner has been unable to work and support his U.S. citizen wife and a newborn U.S. citizen child. He has lost his employment and been separated from his family and a newborn daughter.

52. Petitioner's continued detention is causing ongoing and irreparable harm. He is the primary financial provider for his U.S. citizen family, and his wife recently gave birth and is unable to work. His detention has left the family without its sole source of income, placing them at immediate risk of financial hardship that cannot be remedied retroactively and weighs strongly in favor of habeas relief.

53. Without relief from this Court, Mr. Ofori-Attah faces continued detention without the possibility of an individualized bond hearing.

CLAIM FOR RELIEF

COUNT I

Violation Of 8 U.S.C. § 1226(A) , Unlawful Denial Of Release On Bond

54. Petitioner restates and realleges all paragraphs as if fully set forth here.

55. Mr. Ofori-Attah was initially detained in July 2022. At that time, he was processed and released.

56. In October 2025, about three years after arrival, Mr. Ofori-Attah was re-detained by DHS at the Newark airport, where he worked. DHS subjected him to detention under § 1225, stating that he is subject to mandatory detention.

57. Petitioner may only be detained, if at all, pursuant to 8 U.S.C. § 1226(a).

58. DHS has already made an initial custody determination under 8 U.S.C. § 1226(a) in 2022, ordered his release from detention, and now, due to policy, is subjecting Petitioner to detention under a mandatory provision.

COUNT II

Violation of the Bond Regulations, 8 C.F.R. §§ 236.1, 1236.1 and 1003.19 Unlawful Denial of Release on Bond

59. Petitioner restates and realleges all paragraphs as if fully set forth here.

60. In 1997, after Congress amended the INA through IIRIRA, EOIR and the then-Immigration and Naturalization Service issued an interim rule to interpret and apply IIRIRA. Specifically, under the heading of "Apprehension, Custody, and Detention of [Noncitizens]," the agencies explained that "[d]espite being applicants for admission, [noncitizens] who are present without having been admitted or paroled (formerly

referred to as [noncitizens] who entered without inspection) will be eligible for bond and bond redetermination." 62 Fed. Reg. at 10323. The agencies thus made clear that individuals who had entered without inspection were eligible for consideration for bond and bond hearings before IJs under 8 U.S.C. § 1226 and its implementing regulations.

61. The application of § 1225(b)(2) to Petitioner unlawfully mandates his continued detention and violates 8 C.F.R. §§ 236.1, 1236.1, and 1003.19.

COUNT III
Continued Detention Constitutes A Violation Of Due Process

62. Petitioner incorporates all factual allegations as though restated here.

63. ICE detained Mr. Ofori-Attah without reasonable suspicion and continues to do so in violation of his constitutional rights protected under the Fifth Amendment.

64. The Due Process Clause of the Fifth Amendment forbids the government from depriving any person of liberty without due process of law. U.S. Const. amend. V.

65. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause [of the Fifth Amendment] protects." *Zadvydas*, 533 U.S. at 690.

66. Mr. Ofori-Attah's detention violates his Fifth Amendment rights for at least three related reasons.

67. First, immigration detention must always "bear[] a reasonable relation to the purpose for which the individual was committed." *Demore v. Kim*, 538 U.S. 510, 527 (2003) (*citing Zadvydas*, 533 U.S. at 690).

68. Whereas here, the government has ordered release on parole; detention is not

reasonably related to its purpose.

69. Second, the Due Process Clause requires that any deprivation of Mr. Ofori-Attah's liberty be narrowly tailored to serve a compelling government interest. *See Reno v. Flores*, 507 U.S. 292, 301-02 (1993) (holding that due process "forbids the government to infringe certain 'fundamental' liberty interests at all, no matter what process is provided, unless the infringement is narrowly tailored to serve a compelling state interest"); *Demore*, 538 U.S. at 528 (applying less rigorous standard for "deportable aliens").

70. Petitioner's ongoing imprisonment does not satisfy that rigorous standard, as he did not commit any crime, was released from custody, and has two pending reliefs, his adjustment of status case as well as asylum case.

71. Third, "the Due Process Clause includes protection against unlawful or arbitrary personal restraint or detention." *Zadvydas*, 533 U.S. at 718 (2001) (Kennedy, J., dissenting).

72. Detaining Mr. Ofori-Attah was arbitrary because he had been initially processed for detention under § 1226, released on parole, has authorization to work in the United States, and has no criminal arrests or convictions.

73. Mr. Ofoti-Attah was initially detained under §1226(a), but for a new policy memorandum now subjecting everyone present in the United States who entered without a valid visa to mandatory detention, he is deprives the Petitioner of an individualized bond determination.

PRAYER FOR RELIEF

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

A. Assume jurisdiction over this matter;

B. Issue an Order to Show Cause ordering Respondents to show cause why this

Petition should not be granted within seventy-two hours;

C. Declare that his detention is unlawful;

D. Issue a Writ of Habeas Corpus ordering Respondents to release him from custody or provide him with a bond hearing pursuant to 8 U.S.C. § 1226(a) within seven days;

E. Issue an Order preventing Respondents from removing Petitioner from the United States without notice and an opportunity to be heard;

F. Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment;

G. Award reasonable attorney's fees and costs pursuant to the Equal Access to Justice Act, 5 U.S.C. § 504 and 28 U.S.C. § 2412; and

H. Grant any further relief this Court deems just and proper.

Dated: January 21, 2026

Respectfully Submitted,

/s/ Veronica Cardenas

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

I, Veronica Cardenas, hereby verify that the factual statements made in the foregoing Petition

for Writ of Habeas Corpus and Complaint for Declaratory and Injunctive Relief under 28 U.S.C. § 2242 or under the U.S. Constitution are true and correct to the best of my knowledge.

Dated this 21 day of January, 2026.

s/Veronica Cardenas

Veronica Cardenas, Esq.