**UNITED STATES DISTRICT COURT**
**FOR THE DISTRICT OF MINNESOTA**

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| Katherine Anabel Moposita Mopocita,<br><br>Petitioner,<br><br>v.<br><br>Pamela Bondi, Attorney General,<br><br>Kristi Noem, Secretary, U.S. Department of Homeland Security,<br><br>Todd M. Lyons, Acting Director of Immigration and Customs Enforcement, and<br><br>David Easterwood, Acting Director, St. Paul Field Office Immigration and Customs Enforcement,<br><br>Respondents. | Case No. _____<br><br>**VERIFIED PETITION FOR WRIT OF HABEAS CORPUS**<br><br>Expedited Handling Requested |

## INTRODUCTION

1. Petitioner, Katherine Anabel Moposita Mopocita is a twenty-four-year-old resident of Minneapolis, Minnesota and a citizen of Ecuador. Petitioner was detained by Immigration and Customs Enforcement ("ICE") and remains in ICE's custody. Petitioner has a pending asylum application and is not the subject of a final order of removal.

2. As a part of ICE's systematic effort to transport detainees outside of Minnesota as quickly as possible, Petitioner was transferred to Texas shortly after her arrest. To ensure access to counsel and family, Petitioner asks that the Court order ICE to return her to Minnesota for these proceedings.

3. Counsel has learned troubling information about the circumstances under which detainees have been released from ICE custody. If the Court sees fit to order release, Petitioner respectfully requests specific relief to ensure a safe return home, including release: 1) in Minnesota; 2) at a safe place/time communicated in advance to counsel given subzero outdoor temperatures; 3) with all of his personal effects, such as driver's license, passport, immigration documents, keys, and cell phone; and 4) without conditions such as worn GPS tracking devices, telephonic tracking, or use of the SmartLINK app.

## JURISDICTION AND VENUE

4. The Court has jurisdiction under 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 1361 (federal employee mandamus action); 28 U.S.C. § 1651 (All Writs Act); 28 U.S.C. § 2241 (habeas corpus); Art. I, § 9, c. 2 of the U.S. Constitution ("Suspension Clause"); 5 U.S.C. § 702 (waiver of sovereign immunity); and 28 U.S.C. § 2201 (Declaratory Judgment Act).

5. Federal question jurisdiction exists because Petitioner seeks to challenge this custody as a violation of the Constitution and the Immigration and Nationality Act, 8 U.S.C. § 1101 et seq.

6. Federal district courts have jurisdiction under 28 U.S.C. § 2241 to hear habeas petitions by noncitizens challenging the lawfulness or constitutionality of their detention by the Department of Homeland Security ("DHS"). *Demore v. Kim*, 538 U.S. 510 516-17 (2003); *Jennings v. Rodriguez*, 138 S. Ct. 830, 839-41 (2018); and *Nielsen v. Preap*, 139 S. Ct. 954, 961-63 (2019).

7. Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b), 28 U.S.C. § 1391(e)(1), and 28 U.S.C. § 2241 because Petitioner was apprehended within the District of Minnesota and immediately placed into federal immigration custody, the legality of which is the subject of the instant Petition.

8. Venue is also proper in this Court pursuant to 28 U.S.C. § 1391(e)(1)(A), because Respondents are operating in this district.

**PARTIES**

9. Petitioner is a citizen of Ecuador and a resident of Minneapolis, Minnesota. Petitioner is in Respondents' custody.

10. Respondent Pamela Bondi is being sued in her official capacity as the Attorney General of the United States and the head of the Department of Justice. Attorney General Bondi shares responsibility for implementation and enforcement of the immigration detention statutes, along with Respondent Noem. Attorney General Bondi is a legal custodian of Petitioner.

11. Respondent Kristi Noem is being sued in her official capacity as the Secretary of the Department of Homeland Security. In this capacity, Secretary Noem is responsible for the administration of the immigration laws pursuant to 8 U.S.C. § 1103(a), routinely transacts business in the District of Minnesota, supervises the Fort Snelling ICE Field Office, and is legally responsible for pursuing Petitioner's detention and removal. As such, Respondent Noem is a legal custodian of Petitioner.

12. Respondent Todd M. Lyons is the Acting Director of U.S. Immigration and Customs Enforcement and is sued in his official capacity. Respondent Lyons is responsible for Petitioner's detention.

13. Respondent David Easterwood is being sued in his official capacity as the Acting Field Office Director for the Fort Snelling Field Office for ICE within DHS. In that capacity, Field Director Easterwood has supervisory authority over the ICE agents responsible for detaining Petitioner. The address for the Fort Snelling Field Office is 1 Federal Drive, Fort Snelling, Minnesota 55111.

## FACTUAL ALLEGATIONS AND PROCEDURAL HISTORY

14. Petitioner has lived in the United States since April of 2024.

15. Petitioner has a pending asylum application and has dutifully attended her court dates. She is not the subject of a final order of removal. Petitioner has a valid work permit.

16. Petitioner lives with her mother and works at a local daycare. Petitioner loves to work with children and to cook. Petitioner attends church on Sundays and loves to go out shopping with her mother.

17. Early in the morning on January 22, 2025, Petitioner left her home to go to work. Petitioner was accosted by six masked men near the front door of her home. Petitioner explained to the masked men that she had a pending asylum application. The masked men handcuffed Petitioner and placed her in a van. Upon information and belief, there was no warrant for Petitioner's arrest.

***In Minnesota, the "Largest Immigration Operation Ever" is Underway***

18. Petitioner's detention was part of an operation in Hennepin and Ramsey counties called "Operation Metro Surge." ICE referred to Operation Metro Surge as the "largest immigration operation ever." *See* "2,000 federal agents sent to Minneapolis area to carry out 'largest immigration operation ever,' ICE says, PUBLIC BROADCASTING SERVICE, https://www.pbs.org/newshour/politics/2000-federal-agents-sent-to-minneapolis-area-to-carry-out-largest-immigration-operation-ever-ice-says.

19. Operation Metro Surge caused the number of federal agents purporting to enforce immigration laws in the Twin Cities skyrocket to as high as 3,000, which is more than double the total police officers employed by the Cities of Minneapolis and Saint Paul combined. *See* Homeland Security presence in Minnesota dwarfs Twin Cities' largest police forces, THE MINNESOTA STAR TRIBUNE, https://www.startribune.com/how-ice-numbers-compare-to-twin-cities-largest-police-forces/601562617 .

20. Operation Metro Surge has resulted in two U.S. citizens who reside in Minneapolis—Renee Good and Alex Pretti—being shot and killed by ICE agents. Masked and heavily armed federal agents are patrolling the streets of the Twin Cities to conduct widespread arrests. Agents often use unmarked vehicles, many with illegally covered or mismatched license plates, and even some without plates at all. On other occasions, they drive militarized vehicles such as armored personnel carriers on residential streets. Agents are liberally utilizing physical force and less-than-lethal munitions against observers exercising their First Amendment rights to observe law enforcement agents. *See, e.g.,*

*Tincher et. al. v. Noem*, Doc. No. 85, No. 0:25-cv-04669 (D. Minn. Dec. 17, 2025) (entering preliminary injunction against Respondents).

21. Operation Metro Surge has also seen high numbers of people with U.S Citizenship, legal status, or pending applications to obtain legal status, arrested without warrants and ostensibly based on their race. Respondents are the subject of ongoing class-action lawsuit on these grounds. *See Hussen v. Noem*, Doc. No. 2, 26-cv-00324-PAM-ECW (D. Minn. Jan. 15, 2026).

***Systematic Interstate Transfers of Detained Minnesota Residents Impair Their Access to Justice***

22. Respondents are transporting detained Minnesotans out of state with shocking speed and frequency, making it difficult or impossible to identify the location of detained individuals, let alone facilitate access to counsel. *See, e.g.*, Ellie Roth, *Observer: ICE Detainee Flights Increase at MSP as Enforcement Action Ramps Up*, MPR NEWS (Jan. 14, 2026 4:00 A.M.), https://www.mprnews.org/story/2026/01/14/ice-detainee-flights-leaving-msp-increase-as-surge-continues. Numerous Minnesota residents are now spread across the nation, including at least Texas, Nebraska, Kentucky, and New Mexico.

23. Upon information and belief, ICE often flies detainees out of Minnesota without completing standard processing procedures. Upon information and belief, this violates ICE's policies and procedures. It also creates a heightened risk of detainees being lost in the system.

24. Upon information and belief, ICE's is often prohibiting detainees from visiting with attorneys before boarding a flight out of Minnesota.

25. Upon information and belief, ICE's systematic transfer of most detainees out of Minnesota is motivated, at least in part, by a desire to impair detainees' ability to raise meritorious challenges to the legality of their detention and to forum shop away from the District of Minnesota, where claims for relief that are the same or similar to those presented in the instant Petition frequently have been granted in whole or in part. This is doubly true for detainees who have active immigration cases, as the Government is often transferring concurrently transferring scheduled immigration hearings in Minnesota to out of state jurisdictions and, at times, rescheduling the hearing far sooner than the prior date.

26. Upon information and belief, ICE's systematic transfer of most detainees out of state is motivated, at least in part, by a desire to demoralize detainees by isolating them from their communities, their loved ones, and their counsel. This may encourage detainees to waive their legal rights and sign voluntary deportation agreements.

27. Detaining Petitioner is an expensive, cruel, and pointless endeavor. Petitioner respectfully seeks the opportunity to return home and continue following the legal processes set up by Congress and DHS for immigrants to seek status in this country.

## LEGAL STANDARDS

28. The "Great Writ" of habeas corpus has been referred to by US Courts 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).

29. A petitioner may seek a writ of habeas corpus when their custody violates the US Constitution or a federal law. 28 U.S.C. § 22441(c)(3), which should be granted if

the petitioner meets their burden of proof–a preponderance of evidence. *Aditya W. H. v. Trump*, 782 F. Supp. 3d 691, 703 (D. Minn. 2025).

30. Detained immigrants petitioning under 28 U.S.C. § 2241 face no statutory exhaustion requirements. *Jose J.O.E. v. Bondi*, 797 F. Supp. 3d 957, 965 (D. Minn. 2025). Nor is a judicially imposed prudential exhaustion requirement appropriate where, as here: time is of the essence, facts are largely undisputed, and the parties' disagreement is based on a legal conclusion. *Id.* at 967-68.

31. Courts in the Eighth Circuit have similarly declined to require prudential exhaustion when evaluating a detained immigrant's habeas corpus petition under similar circumstances–to address a question of statutory interpretation that does not require developing a factual record, and where the agency is demonstrably unlikely to reverse its course. *Giron Reyes v. Lyons*, 2025 WL 2712427 at *3 (N.D. Iowa Sept. 23, 2025).

32. "[T]he Due Process Clause applies to all 'persons' within the United States, including [immigrants], whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001).

33. Respondents ostensibly premise Petitioner's detention on an erroneous interpretation of 8 U.S.C. § 1225(b)(2). In July of 2025, Respondent DHS began ignoring the decades-long consensus of how section 1225(b)(2) should be interpreted, which the Board of Immigration Appeals ("BIA") articulated in a subsequent ruling. *Matter of Yajure Hurtado,* 29 I&N Dec. 216 (BIA Sept. 5, 2025). Respondents suddenly claim that individuals who have been residing within the United States for more than two years are

somehow metaphorically "seeking admission," simply because they may have pending claims for asylum or other forms of status.

34. However, nearly every Judge in this District, and the vast majority around the nation, have rejected Respondents' interpretation of section 1225(b)(2). *Castañon-Nava v. U.S. Dep't of Homeland Sec.*, 161 F.4th 1048, (7th Cir. 2025) ("What is more, Defendants' construction would render § 1225(b)(2)(A)'s use of the phrase 'seeking admission' superfluous, violating one of the cardinal rules of statutory construction."); *Misael T. v. Bondi*, 26-cv-263 (D. Minn. Jan. 20, 2026) (Hon. Tostrud, J.); *Ruben V. v. Noem*, 26-CV-289 (D. Minn. Jan. 20, 2026) (Hon. Bryan, J.); *Juan R. v. Bondi*, 26-cv-252 (D. Minn. Jan. 16, 2026) (Hon. Nelson, J.); *Mahdi O. v. Noem*, 26-CV-0083 (D. Minn. Jan. 14, 2026) (Hon. Schlitz, J.); *Abdirashid H.M. v. Noem*, No. 25-4779 (D. Minn. Jan. 9, 2026) (Hon. Tunheim, J.); *Ramon R.C. v. Olson*, 2025 U.S. Dist. LEXIS 269571, *13 2025 WL 3900425 (D. Minn. Dec. 30, 2025) (Hon. Brisbois Maj. J) (**"Federal courts across the United States, including the overwhelming majority of Courts to consider the issue, have reached this same conclusion and rejected Respondents' argument to the contrary more than 300 separate times."**); *Awaale v. Noem*, No. 25-04551, 2025 WL 3754012 2025 U.S. Dist. LEXIS 266286 (D. Minn. Dec. 29, 2025) (**"the weight of opinions in this District and in the rest of the country that have ruled against Respondents' interpretation. This Court is one of them."**) (Hon. Davis, J.); Beltran v. Bondi, No. 25-04604 (MJD/DTS), 2025 WL 3719856, at *4 (D. Minn. Dec. 23, 2025) ("Petitioner is not subject to mandatory detention under 8 U.S.C. § 1225(b)(2), and is instead subject to detention, if at all, pursuant to the discretionary provisions of 8 U.S.C. §

1226(a)(1)"); *Hugo D.P. v. Olson*, 25-cv-4593, 2025 U.S. Dist. LEXIS 262404, *3 2025 WL 3688074 (D. Minn. Dec. 19, 2025) (Hon. Provinzino, J.) ("**this Court and nearly every federal court to consider the [Respondents' interpretation of § 1225] have rejected [this] reasoning ... and ordered the Government to provide bond hearings to noncitizens.");** *Belsai D.S. v. Bondi*, No. 25-CV-3682 (KMM/EMB), 2025 WL 2802947, at *6 (D. Minn. Oct. 1, 2025) ("This Court joins that chorus. As these other courts have observed, Respondents' interpretation of § 1225(b)(2) is unpersuasive.").

35. Here, Petitioner was apprehended within the United States, not at a border while seeking entry. Respondents wrongly assert 8 U.S.C. 1225(b)(2) as a basis for detaining Petitioner without a hearing, when instead any detention could only be pursuant to 8 U.S.C. 1226(a), which would also require a warrant and which here the Respondents are not purporting to invoke.

## CLAIMS FOR RELIEF

### COUNT ONE

### Fifth Amendment Due Process

*Respondents are Confining Petitioner without A Valid Legal Basis or any Semblance of Due Process.*

36. Petitioner realleges all above allegations as if fully stated herein.

37. Petitioner has due process rights as a resident of the United States. *Zadvydas v. Davis*, 533 U.S. 678, 693 (2001).

38. Federal courts use the three-part test in *Matthews v. Eldridge* to determine whether civil detention violates a detainee's due process rights. 424 U.S. 319 (1976). The elements of this test are: (1) the private interest that the official action affects; (2) the risk

that the procedures used will result in an erroneous deprivation of the private interest, and the probable value, if any, of additional or substitute procedural safeguards; and (3) the Government's interest in following the existing procedures, both in achieving their objectives and in the potential burdens of an alternate procedure. *Id.* at 335.

39. Here, all three factors favor the petitioner.

40. First, Petitioner has a significant private interest at stake. A person's interest in freedom from physical detention is "the most elemental of liberty interests." *Hamdi v. Rumsfeld*, 542 U.S. 507, 529, 124 S.Ct. 2633, 159 L.Ed.2d 578 (2004); see also *Zadvydas*, 533 U.S. at 690, 121 S.Ct. 2491 ("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."). Petitioner is wrongfully confined, a direct attack on Petitioner's liberty interests.

41. Second, Petitioner will continue to be deprived of this interest if the current procedure (detaining Petitioner without a legal basis) is followed. There is no rational explanation for detaining Petitioner. Respondents' purported basis for detaining Petitioner under 8 U.S.C. 1225(b)(2) has been rejected time and time again in this court. *Ahmed A v. Bondi*, Case No. 25-4776 (JWB/DJF) (January 6, 2026); *Maldonado v. Olson*, 795 F. Supp. 3d 1134, 1142–48, 1150–52 (D. Minn. 2025); *Jose J.O.E. v. Bondi*, 797 F. Supp. 3d 957, 968–970 (D. Minn. 2025); *Mayamu K. v. Bondi*, Civ. No. 25-3035 (JWB/LIB), 2025 WL 3641819, at *7–8 (D. Minn. Oct. 20, 2025); *R.E. v. Bondi*, No. 0:25-cv-3946-NEB, 2025 WL 3146312 (D. Minn. Nov. 4, 2025); *Herrera Avila v. Bondi*, No. 0:25-cv-3741 (JRT), 2025 WL 2976539 (D. Minn. Oct. 21, 2025).

42. Lastly, the Government has no legitimate interest in refusing to follow its own rules. Petitioner poses no safety threats to the community. Releasing Petitioner, or at a minimum holding a bond hearing, would in fact *save* the government the resources and expense of continued imprisonment.

43. The placement of Petitioner in detention pending the resolution of ongoing immigration proceedings violates Petitioner's constitutional rights to due process guaranteed in the Fifth Amendment.

**COUNT TWO**

**Immigration and Nationality Act, 8 U.S.C. § 1225(b)(2)**

*Petitioner's Ongoing Detention Pursuant to 8 U.S.C. § 1225(b)(2) is Unlawful because Petitioner is not Seeking Admission and therefore cannot be held under that Authority*

44. Petitioner realleges all above allegations as if fully stated herein.

45. Respondents violate the Immigration and Nationality Act by attempting to apply mandatory detention through 8 U.S.C. § 1225(b)(2), to Petitioner. Petitioner was nowhere near the border and was not "seeking admission"

**COUNT THREE**

**Violation of the Administrative Procedure Act, 5 U.S.C. § 706**

*Detaining Petitioner Pursuant to an Unlawful Interpretation of 8 U.S.C. § 1225(b)(2) violates the Administrative Procedure Act*

46. Petitioner realleges all above allegations as if fully stated herein.

47. The APA provides that a "reviewing court shall . . . hold unlawful and set aside agency action, findings, and conclusions found to be . . . arbitrary and capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. § 706(2)(A).

48. The APA provides that a "reviewing court shall . . . hold unlawful and set aside agency action, findings, and conclusions found to be . . . without observance of procedure required by law." 5 U.S.C. § 706(2)(D).

49. The mandatory detention provision at 8 U.S.C. § 1225(b)(2) does not apply to all noncitizens residing in the United States who are subject to the grounds of inadmissibility. As relevant here, it does not apply to those who previously entered the country and have been residing in the United States prior to being apprehended and placed in removal proceedings by Respondents. Such noncitizens could properly be detained under § 1226(a), but would then be eligible for release on bond unless they are subject to § 1225(b)(1), § 1226(c), or § 1231.

50. Nonetheless, the Board has adopted a policy and practice of applying § 1225(b)(2) to Petitioner and others in the same position.

51. Respondents through its recent administrative decision failed to articulate any reasoned explanations for new interpretation of the Act. The Board's decision represents a change in the agencies' policies and positions that negates the plain language of the Act, the will of Congress, and decades of administrative precedent.

52. The application of § 1225(b)(2) to Petitioner is arbitrary, capricious, and not in accordance with law, and as such, it violates the APA. See 5 U.S.C. § 706(2).

**REMEDY**

53. An available remedy for Respondents' unlawful conduct as outlined in this complaint is for Petitioner to be released.

54. Immigration detention is civil in nature, and as a result Congress must have expressly authorized it by statute, and the detention must be reasonably related to its statutory purpose. *Zadvydas v. Davis*, 533 U.S. 678, 687, 690 (2001) (quoting *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). Detention here serves no statutory purpose, there is no indication that Petitioner's detention was based on any facts that might indicate that Petitioner should be in custody for some reason.

55. Since Section 1225 does not apply to noncitizens who are in Petitioner's situation—who have been detained while residing within the United States for more than two years, as opposed to those who are detained while in the process of physically entering the United States, the law that Respondents are using to detain Petitioner simply does not apply so as to authorize Petitioner's detention. *See Eliseo A.A. v. Olson*, Civ. No. 25-3381 (JWB/DJF), 2025 WL 2886729 (D. Minn. Oct. 8, 2025); *Mayamu K. v. Bondi*, Civ. No. 25-3035 (JWB/LIB), 2025 WL 3641819 (D. Minn. Oct. 20, 2025); *Khalid B.Q. v. Bondi*, Civ. No. 25-4584 (JWB/DJF), Doc. No. 10 (D. Minn. Dec. 18, 2025); *Xuseen A. v. Bondi*, Civ. No. 25-4514 (JWB/DJF), Doc. No. 16 (D. Minn. Dec. 19, 2025); *Vedat C. v. Bondi*, Civ. No. 25-4642 (JWB/DJF), Doc. No. 9 (D. Minn. Dec. 19, 2025).

56. When a habeas petitioner's detention is without legal basis, the typical remedy is release. *Munaf v. Geren*, 553 U.S. 674, 693 (2008) (describing release as the "typical remedy" for "unlawful executive detention").

57. Respondents will no doubt argue, as they have in similar cases before this Court, that if the Court rules that Petitioner should have been detained pursuant to § 1226, instead of § 1225, then the remedy is a bond hearing as opposed to outright release. *See*,

e.g., *Ahmed A.* Civ. No. 25-4776, Doc. No. 9. at 9-10. However, this Court rejected this argument, saying that:

> [A] bond hearing presupposes lawful detention authority under § 1226. Where that authority has not been invoked or established, ordering a bond hearing would treat the absence of statutory authority as a mere procedural irregularity rather than a substantive defect ... Where the record shows Respondents have not identified a valid statutory basis for detention in the first place, the remedy is not to supply one through further proceedings.

*Id.* at Doc. No. 10 at 6.

58. Nor here would § 1226(a) have supported a lawful detention in the first instance. Detention under § 1226(a) would require a warrant issued by the Attorney General. *Jose J.O.E. v. Bondi*, 797 F. Supp. 3d 957, 961 (D. Minn. 2025). To put this plainly: "absent a warrant a noncitizen may not be arrested and detained under section 1226(a)." *See also Ahmed M. v. Bondi et al.*, 2026 WL 25627, *3 (D. Minn. Jan. 5, 2026) (quoting *Chogllo Chafla v. Scott*, --- F. Supp. 3d ---, No. 2:25-cv-00437-SDN, 2025 WL 2688541, at *11 (D. Me. Sept. 21, 2025)). Upon information and belief, Respondents had no such warrant.

59. Here, where detention is unlawfully based on 8 U.S.C. 1225(b)(2), which does not apply to Petitioner, release is an appropriate remedy.

**REQUEST FOR ORDER TO SHOW CAUSE**

60. Within three days "[a] court, justice or judge entering a writ of habeas corpus shall forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person detained is not entitled thereto." 28 U.S.C. § 2243.

## PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

(1) Assume jurisdiction over this matter;

(2) Enjoin Respondents from transporting Petitioner outside of Minnesota, or transport Petitioner back to Minnesota if she is moved out of state;

(3) Order Respondents to show cause as to why Petitioner should not be released immediately, or in the alternative afforded a bond hearing;

(4) Alternatively, issue a writ of habeas corpus requiring Respondents to release Petitioner unless they provide a bond hearing under 8 U.S.C. § 1226(a) within seven days;

(5) If the Court sees fit to order Petitioner's release, specified relief to ensure a safe return home, including release:

(a) Inside of Minnesota;

(b) At a safe time and place communicated in advance to counsel; and

(c) With all of Petitioner's personal effects, such as driver's license, immigration papers, passport, cell phone, and keys.

(6) Enjoin Respondents from implementing any condition of release, including ICE's "Alternatives to Detention" measures, which include ankle monitors, body-worn GPS, telephonic tracking, or use of the SmartLINK Mobile Application;

(7) Enjoin Respondents from detaining Respondent again on any legal theory rejected by the Court in adjudicating this Petition; and

(8) Grant any other and further relief that this Court may deem just and proper.

Date: January 30, 2026

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**Verification by Someone Acting on Petitioner's Behalf Pursuant to 28 U.S.C. § 2242**

I am submitting this verification on behalf of Petitioner because I am Petitioner's attorney. The factual allegations herein are based on conversations with Petitioner's mother, who is acting on Petitioner's behalf and who I understand to have personal knowledge of the facts alleged herein. I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus, including the statements regarding Petitioner's detention status, are true and correct to the best of my knowledge.

Date: January 30, 2026

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