

IN THE UNITED STATES DISTRICT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

Faheem Abdul Jaleel

Petitioner,

JESSICA SAGE, in her official
capacity as Warden of
FCI Lewisburg

BRIAN MCSHANE,

In his official capacity
as Acting Field officer
of Immigration and
Customs Enforcement,
Enforcement and Removal
Operations Philadelphia
Field office

KRISTI NOEM,

In her official capacity
as Secretary of the
Department of
Homeland Security

PAM BONDI,

In her official capacity
as Attorney General of
the United States

Respondents

FILED
HARRISBURG, PA

FEB 18 2026

PER _____

DEPUTY CLERK

VERIFIED PETITION
FOR WRIT OF HABEAS
CORPUS PURSUANT TO
28 U.S.C. SECTION
2241 BY A PERSON
SUBJECT TO INDEFINITE
IMMIGRATION DETENTION

3:26-CV-00412

INTRODUCTION

- 1- My Name is Faheem Abdul Jaleel ("Petitioner")
- 2- I am Currently being detained by Department of Homeland Security (DHS) FCI Lewisburg Federal Prison in Lewisburg, Pennsylvania. I have been in immigration detention since August 30, 2024 for a period of approximately Seventeen months.
- 3- Since I have entered the United States, I have been given the following immigration status: Lawful Permanent Resident. When I entered the United States, I was accorded the following immigration status: Refugee (REG) and Visa. When I was detained by ICE, my immigration status was: Lawful Permanent Residence and Refugee (REG). See Exhibit A: "Copy of Faheem Abdul Jaleel's Lawful Permanent Resident Card." I was order removed on March 27, 2025. I was detained at Moshannon Valley Processing

Center from April 7, 2025 to January 23, 2026. I have been detained in FCI Lewisburg since January 23, 2026.

4- on March 27, 2025, the Immigration Judge sustain charges of removability against me and ordered me removed to Afghanistan.

5- Despite holding me in immigration detention for more than six months after receiving a final order of removal, DHS has not been able to effectuate my removal. Given DHS's delay thus far, there is no significant likelihood that I will be removed from the country in a reasonably foreseeable time and DHS must release me. See generally *Zadvydas v. Davis*, 533 U.S. 678 (2001).

6. Accordingly, I respectfully request that the Court use its authority under 28 U.S.C. § 2243 to order the Respondent to file an answer and

return within three days, unless they can show good cause for additional time. See 28 U.S.C. § 2243 (stating that an order to show cause why a petition for a writ of habeas corpus should be denied "shall be returned within three days unless for good cause additional time, not exceeding twenty days, is allowed").

PARTIES

7. Petitioner, Faheem Abdul Jaleel, is detained at FCI Lewisburg. Since Petitioner entered the United States, Petitioner has been accorded the following immigration status: Lawful Permanent Resident. When Petitioner entered the United States, Petitioner was accorded the following immigration status: Refugee (REG) And

Visa. When Petitioner was detained by ICE, Petitioner's immigration Status was: Lawful Permanent Resident, Petitioner was order removed on March 27, 2025. Petitioner was detained at Moshannon Valley Processing Center from April 7, 2025 to January 23, 2026. Since January 23, 2026 Petitioner has been detained in FCI Lewisburg.

8- Respondent Jessica Sage is Sued in her official Capacity as the Warden of the FCI Lewisburg at which Petitioner is Currently detained/Imprisoned.

9- Respondent Brian McShane is Sued in his official Capacity as Acting Field Office of Immigration and Customs Enforcement, Enforcement and Removal Operations Philadelphia Field Office.

10- Respondent Kristi Noem is Sued in her official Capacity as Secretary of the Department of Homeland Security.

11- Respondent Pam Bondi is Sued in her Capacity as Attorney General of the United States.

JURISDICTION AND VENUE

- 12- This Court has jurisdiction under the United States Constitution. U.S. CONST. art. I § 9, cl. 2. This Court also has jurisdiction under 28 U.S.C. § 1331 (federal question), 28 U.S.C. § 2241 (habeas corpus), and 28 U.S.C. § 1651 (All Writs Act).
- 13- Additionally, this Court has jurisdiction to grant injunctive relief pursuant to the Declaratory Judgment Act, 28 U.S.C. § 2202.
- 14- Venue is proper in the U.S. District Court for the Middle District of Pennsylvania because I am currently being detained within this District at the FCI Lewisburg in Lewisburg Pennsylvania, which is within the Middle District. See 28 U.S.C. § 1391 (e)

~~Middle~~

~~16. Venue is proper in the U.S. District Court for the Western District of Pennsylvania~~
~~because I am currently being detained within this District at the Moshannon Valley~~
~~Processing Center in Philipsburg, Pennsylvania, which is within the Western District.~~
~~See 28 U.S.C. § 1391(e).~~

EXHAUSTION OF REMEDIES

¹⁵~~17.~~ There is no statutory exhaustion requirement for a petition challenging immigration detention. *See Cox v. Monica*, No. 1:07-CV-0534, 2007 WL 1804335 at *8 (M.D. Pa. June 20, 2007) ("Under the immigration laws, exhaustion of administrative remedies is statutorily required only on appeals of final orders of removal.") (citing 8 U.S.C. § 1252)(d)(1)).

FACTUAL BACKGROUND

¹⁶~~18.~~ I was ordered removed to Afghanistan. My removal order became final on April 29, 2025. I have done the following things that ICE has asked me to effectuate my removal order: ICE ordered me to effectuate my removal and provided me a check list of instructions to do in order to cooperate in obtaining a travel document (*see* "INSTRUCTION SHEET TO DETAINEE REGARDING REQUIREMENT TO ASSIST IN REMOVAL", second page of **Exhibit B: a or b**: "Warning for Failure to Depart"). I have fulfilled these "REQUIREMENT[s]".

a The first "REQUIREMENT" states: " Submit passports (current and expired) to ICE. If you have a copy of your passport, you are to submit it." Since I do not have a passport, current or expired—because I did not enter the United States with a passport—this "REQUIREMENT" must not apply to me.

b The second "REQUIREMENT" states:

Apply for a travel document/passport from your embassy or consulate, or directly from your government in your native country, or any other embassy or consulate of your native country in another country.

I have fulfilled the parts of this "REQUIREMENT", "Apply for a travel document/passport from your embassy or consulate...or any other embassy or consulate of your native country." See Exhibit C: a, b, c, d, e: "Letters to Consulates and to Embassy in Washington, DC, And Their Respective Attachments And "CERTIFIED MAIL RECEIPT Proofs of Shipment", where one was made available. I have sent letters to Afghan consulates in New York, NY and to Toronto, ON, Canada. See Exhibit C: a and b. I have also sent one letter to the Afghan embassy in Washington, DC. See Exhibit C: c. Along with my letters to to the above mentioned diplomatic agencies, I have attached a passport application and an identity document called Birth Registration Card. See Exhibit C: d: "Islamic Republic of Afghanistan Passport Application and Birth Registration Card."

I have not received any response from the diplomatic agencies, nor any passport or travel document.

As for the part of the second "REQUIREMENT", "[Apply for a travel document/passport] directly from your government in your native country," it is impossible for me to do this because (a) I do not know how, and (b), when I asked my brother—the only family member I have connections with and the only one who can fluently understand English because I have extreme difficulty speaking my native language—he told me that he had applied for an Afghan passport before and was told that he *himself* must be present to apply and receive the *his* passport if it is granted. So

I would have to be present in Afghanistan to obtain a passport, which is not possible at this time. Accordingly, I have complied with this "REQUIREMENT".

- c The third "REQUIREMENT" states: "Comply with all instructions from all embassies or consulates requiring completion of documentation for issuance of a travel document."

I have complied with this twice. Once when I first filled out the passport application, probably in mid April, 2025, before my first 90 day review for custody redetermination. I do not possess a copy to present evidence of this, and ICE will not issue me a copy. I have asked. The second time I complied with this "REQUIREMENT", though I was not asked, was when I completed the contents of Exhibit C. I sent also a copy of this passport application to ICE on 09/06/2025, which is over three months ago. Accordingly, I have complied with this "REQUIREMENT".

- d The fourth "REQUIREMENT" states:

Submit to ICE birth certificates, national identification cards, and any other document issued by a foreign government indicating your citizenship, nationality, place of birth, and place of residence prior to entering the United States.

I possess no such document, and thus should not be held in noncompliance for this. After my father was killed in Afghanistan, we left, fled Afghanistan to Pakistan, for fear of persecution and either did not have documents or did not have time to pack up. The situation was extremely dangerous according to my aunt who brought me to Pakistan and then to the United States. So, if I remember correctly, my aunt did not have time to pack up *anything*. That is what she had said when she often told the story. Accordingly, I have complied with this "REQUIREMENT".

- e The fifth "REQUIREMENT" states:

Provide names and addresses of family and friends residing in the United States and request that they contact your embassy or consulate in the United States, in order to facilitate the issuance of a travel document.

On December 12, 2025, ICE had set up a video call with an Afghan embassy in Ottawa, Canada for me to ask them for a travel document/passport. After I asked the embassy for a travel document/passport, he told me that there is no reparation agreement with Afghanistan and the United States, and that all the consulates and embassies in Afghan are closed. He told me this because I explained that the diplomatic missions don't pick up the phone whenever my brother or myself make phone calls to them. I have provided ICE my brother's name, cell phone number, and address. See Exhibit D: "Toofan Jaleel's Statement" and "Copy of Toofan Jaleel's US Passport". My brother is not computer savvy or research savvy to find phone numbers to consulates or embassies, or when they are open. I have told him to contact the consulates and embassies in New York and in California. He says he has "made multiple calls, they just don't pick up the phone." Accordingly, I have complied with this "REQUIREMENT".

f The sixth "REQUIREMENT" states:

Provide names and addresses of family and friends residing in your country of citizenship and request family and friends residing abroad contact your government in reference to issuing a travel document.

According to my family and friend, person to be issued a passport/travel document from Afghan must be present in Afghanistan. So they cannot help me; consequently, I have complied with this "REQUIREMENT".

g The seventh "REQUIREMENT" states:

You are required to take measures to request reinstatement of your previous nationality, register as required, or take any other action that will ensure the issuance of a travel document and your removal from the United States.

I do not know how to complete this requirement. In April 2025, My docket officer, A. Coulibaly told me that he does not need a birth certificate to get me removed because he has one. He was referring to a copy of a document called Birth Registration Card, which is part of an attachment in Exhibit C: d. I don't know the source of this birth record/identity card and ICE (i.e., my docket officer, A. Coulibaly) has told me neither can he confirm its source. Moreover, he did not present it to my the Afghan embassy in Ottawa, Canada when he set up the video call between me and the embassy for a passport/travel document. Accordingly, I have complied with this "REQUIREMENT".

ICE had set up a web based video call between me and an Afghan embassy in Ottawa, Canada. The purpose of this call was to get me a a passport/travel document to effectuate my removal from the United States. I asked the embassy for a travel document. And moreover, a few days later, ICE told me I must write a letter to the Embassy, explaining that I want an Emergency Travel Document. I did that. This is another way I have complied with this "REQUIREMENT".

h The eight "REQUIREMENT" states: "Provide ICE with written copies of requests to embassies and consulates requesting issuance of a travel document." I completed this on December 3, 2025, when I sent my docket officer, A. Coulibaly written copies of requests to embassies and consulates requesting issuance of a travel

document. For proof of service on my docket officer, *see Exhibit C: e*. Accordingly, I have complied with this "REQUIREMENT".

- i The ninth "REQUIREMENT" states: "Provide ICE with written copies of responses from embassies or consulates regarding your requests."

I have not received any responses from embassies or consulates regarding my requests. Accordingly, I have complied with this "REQUIREMENT".

- j The tenth "REQUIREMENT" states: "Solicit permission from another country, which may be able to accept you, to enter that country to affect your removal from the United States."

I do not believe this applies to me. However, I have tried this also. I asked the Netherlands for a travel document to go live there. From the information their consulate directed me to, it has become clear to me that the Netherlands does not accept people who are convicted of a crime. *See Exhibit E: "UNHCR Help The Netherlands"*, which states, "However, refugees convicted of a crime...are not eligible for resettlement." Defining "resettlement" as "the careful identification by UNHCR and invitation by governments for the most vulnerable refugees to move to and receive asylum in another country, in case these refugees cannot return to their country of origin nor stay in the host country."

- k The eleventh and finale "REQUIREMENT" states: "Provide your true and correct name and date of birth and any other identities you have ever used."

I followed the final "REQUIREMENT" instruction when I filled out the passport applications for passport to Afghanistan, providing my true and correct information. Accordingly, I have complied with this "REQUIREMENT".

LEGAL ARGUMENT

17.

~~19.~~ The Supreme Court has stated that "[f]reedom from government custody [and] detention lies at the heart of the liberty that [the Due Process] Clause protects." *Zadvydas*, 533 U.S. at 690 (citing *Foucha v. Louisiana*, 504 U.S. 71, 80 (1992)). The Supreme Court further noted in *Zadvydas* that "[a] statute permitting indefinite detention of a [noncitizen] would raise a serious constitutional problem." *Id.* at 690.

18.

~~20.~~ The Due Process clause applies to all persons in the United States, "whether their presence here is lawful, unlawful, temporary, or permanent." *Id.* at 693; *see also Plyler v. Doe*, 457 U.S. 202, 210 (1982) ("[Noncitizens], even [noncitizens] whose presence in this country is unlawful, have long been recognized as 'persons' guaranteed due process of law by the Fifth and Fourteenth Amendments.>").

19.

~~21.~~ Congress authorizes the DHS to detain noncitizens during a statutorily defined "removal period," during which the Department may effectuate the noncitizen's removal from the United States. 8 U.S.C. § 1231(a)(1). The removal period typically lasts for ninety days and starts at the latest of: (1) the date an order of removal becomes administratively final; (2) if a removal order is judicially reviewed and a stay of removal has been ordered, the date of the court's final order; or (3) the date the noncitizen is released from any detention other than for immigration purposes. 8 U.S.C. § 1231(a)(1)(B).

20.

~~22.~~ Under 8 U.S.C. § 1231(a)(2), noncitizens subject to final orders of removal "shall" be detained during the first ninety days—the "removal period"—and they "shall" be removed during that period under § 1231(a)(1). Under 8 U.S.C. § 1231(a)(6), however, the government "may" continue detention beyond the 90-day removal period if a noncitizen falls within certain broad categories of removability or is determined "to be

a risk to the community or unlikely to comply with the order of removal." 8 U.S.C. § 1231 (a)(6).

²¹/₂₃. The Supreme Court in *Zadvydas*, in order to avoid the serious due process concerns that would be presented by permitting detention for an indefinite period of time, construed 8 U.S.C. § 1231 (a)(6) to authorize detention only where it is significantly likely that removal will occur in the reasonably foreseeable future. *Zadvydas*, 533 U.S. at 689. The Supreme Court construed § 1231(a)(6) to authorize detention only for a "period reasonably necessary to secure removal" — a period that the Court determined to be presumptively six months. *Id* at 699-701.

²²/₂₄. An alien who has been detained beyond the presumptive six months should be released where the government is unable to present documented confirmation that the foreign government at issue will agree to accept the particular individual in question. See *Agbada v. John Ashcroft*, 2002 U.S. Dist. LEXIS 15797 (D. Mass. August 22, 2002) (court "will likely grant" habeas petition after fourteen months if ICE is "unable to present document confirmation tha[t] the Nigerian government has agreed to [petitioner's] repatriation"); *Zhou*, 2001 U.S. Dist. LEXIS 19050 at *7 (W.D. Wash. February 28, 2002) (government's failure to offer specific information regarding how or when it expected to obtain the necessary documentation or cooperation from the foreign government indicated that there was no significant likelihood of petitioner's removal in the reasonable foreseeable future).

²³/₂₅. After a noncitizen meets his or her initial burden to show that no such likelihood of removal exists, the burden shifts to the Government to "respond with evidence

sufficient to rebut [the noncitizen's] showing." *Id.* at 701. ¹If the government cannot do so, the individual must be released.

²⁴~~26~~. The Supreme Court in *Zadvydas* also ruled that "for detention to remain reasonable, as the period of prior post-removal confinement grows, what counts as the 'reasonably foreseeable future' conversely would have to shrink." *Id.*; see also *Alexander v. Att'y Gen.*, 495 F. App'x 274, 276-77 (3d Cir. 2012) ("*Zadvydas* ... suggests that an inversely proportional relationship is at play: the longer an alien is detained, the less he must put forward to obtain relief.").

²⁵~~27~~. The DHS's inability to effectuate my removal provides threshold evidence that there is not a significant likelihood of removal in the foreseeable future. *Id.* at 276 (quoting *Zadvydas*, 533 U.S. at 701) (after a presumptively reasonable period of six months and the noncitizen showed evidence of no significant likelihood of removal, the government must then "respond with evidence to rebut that showing"); see also *Shahbaz H. v. Green*, No. 198052, 2019 WL 2723880 at *5 (D. NJ. July 1, 2019) ("[T]he Government can establish its continued authority to detain only if the Government can rebut [the] evidence and show that the alien's removal remains likely in the reasonably foreseeable future.").

²⁶~~28~~. My removal period began on April 29, 2025, when my removal order became final.

¹ To the extent Respondent claims otherwise, the Supreme Court's decision in *Johnson v. Arteaga-Martinez* has no application here. 142 S. Ct. 1827 (2022). *Arteaga-Martinez* merely held that, as a matter of statutory construction, 8 U.S.C. § 1231 does not require automatic bond hearings after six months of detention. *Id.* at 1833. *Arteaga-Martinez* does not reach the question of what due process requires under the Constitution, nor does it undermine the presumption affirmed in *Zadvydas* that post-order detention becomes unreasonable after six months. *Id.* at 1834-35.

~~27~~/~~29~~. My removal period expired on July 28, 2025, ninety days after its initiation. I have been detained beyond the ninety days pursuant to 8 U.S.C. 123 1(a)(6).

~~28~~/~~30~~. My removal to Afghanistan is not foreseeable. In addition to other reasons, I have learned that another detainee, Faisal Wazir, who is from Afghanistan, who ^{was} ~~is~~ detained in the facility I am in, Moshannon Valley Processing Center, has had a travel document as of August 29, 2025, yet, ICE has not been able to deport him. And Mr. Wazir has had the same Docket Officer as I have, A. Coulibaly. I have managed to get a copy of his travel document and a statement from him. See Exhibit F: "Faisal Wazir's Travel Document".

~~29~~/~~31~~. As discussed above, I have done the following things to cooperate with ICE to effectuate my removal order: I have completed a check list of instructions ICE had given to me to do in order to cooperate in obtaining a travel document (see "INSTRUCTION SHEET TO DETAINEE REGARDING REQUIREMENT TO ASSIST IN REMOVAL", Exhibit B: a or b). I have fulfilled these "REQUIREMENT[s]".

a The first "REQUIREMENT" states: " Submit passports (current and expired) to ICE. If you have a copy of your passport, you are to submit it." Since I do not have a passport, current or expired—because I did not enter the United States with a passport—this "REQUIREMENT" must not apply to me.

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I have complied with this twice. Once when I first filled out the passport application, probably in mid April, 2025, before my first 90 day review for custody redetermination. I do not possess a copy to present evidence of this, and ICE will not issue me a copy. I have asked. The second time I complied with this "REQUIREMENT", though I was not asked, was when I completed the contents of Exhibit C. I sent also a copy of this passport application to ICE on 09/06/2025, which is over three months ago. Accordingly, I have complied with this "REQUIREMENT".

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I possess no such document, and thus should not be held in noncompliance for this. After my father was killed in Afghanistan, we left, fled Afghanistan to Pakistan, for fear of persecution and either did not have documents or did not have time to pack up. The situation was extremely dangerous according to my aunt who brought me to Pakistan and then to the United States. So, if I remember correctly, my aunt did not have time to pack up *anything*. That is what she had said when she often told the story. Accordingly, I have complied with this "REQUIREMENT".

- e The fifth "REQUIREMENT" states:

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On December 12, 2025, ICE had set up a video call with an Afghan embassy in Ottawa, Canada for me to ask them for a travel document/passport. After I asked the embassy for a travel document/passport, he told me that there is no repatriation agreement with Afghanistan and the United States, and that all the consulates and embassies in Afghan are closed. He told me this because I explained that the diplomatic missions don't pick up the phone whenever my brother or myself make phone calls to them. I have provided ICE my brother's name, cell phone number, and address. See Exhibit D: "Toofan Jaleel's Statement" and "Copy of Toofan Jaleel's US Passport". My brother is not computer savvy or research savvy to find phone numbers to consulates or embassies, or when they are open. I have told him to contact the consulates and embassies in New York and in California. He says he has "made multiple calls, they just don't pick up the phone." Accordingly, I have complied with this "REQUIREMENT".

f The sixth "REQUIREMENT" states:

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According to my family and friend, person to be issued a passport/travel document from Afghan must be present in Afghanistan. So they cannot help me; consequently, I have complied with this "REQUIREMENT".

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You are required to take measures to request reinstatement of your previous nationality, register as required, or take any other action that

will ensure the issuance of a travel document and your removal from the United States.

I do not know how to complete this requirement. In April 2025, My docket officer, A. Coulibaly told me that he does not need a birth certificate to get me removed because he has one. He was referring to a copy of a document called Birth Registration Card, which is part of an attachment in Exhibit C: d. I don't know the source of this birth record/identity card and ICE (i.e., my docket officer, A. Coulibaly) has told me neither can he confirm its source. Moreover, he did not present it to my the Afghan embassy in Ottawa, Canada when he set up the video call between me and the embassy for a passport/travel document. Accordingly, I have complied with this "REQUIREMENT".

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I do not believe this applies to me. However, I have tried this also. I asked the Netherlands for a travel document to go live there. From the information their consulate directed me to, it has become clear to me that the Netherlands does not accept people who are convicted of a crime. See Exhibit E: "UNHCR Help The Netherlands", which states, "However, refugees convicted of a crime...are not eligible for resettlement." Defining "resettlement" as "the careful identification by UNHCR and invitation by governments for the most vulnerable refugees to move to and receive asylum in another country, in case these refugees cannot return to their country of origin nor stay in the host country."

k The eleventh and finale "REQUIREMENT" states: "Provide your true and correct name and date of birth and any other identities you have ever used."

I followed the final "REQUIREMENT" instruction when I filled out the passport applications for passport to Afghanistan, providing my true and correct information. Accordingly, I have complied with this "REQUIREMENT".

32. Accordingly, unless the Respondent can supply sufficient evidence to the contrary, they should now release me from their custody because my "continued detention [has become] unreasonable and [is] no longer authorized by statute." *Zadvydas*, 533 U.S. at 699—700.

~~31.~~
32. Therefore, release, not a bond hearing, is the proper remedy. *See id.* (stating that where there is a lack of statutory authority to detain, the noncitizen must be released and courts can consider appropriate conditions of release); *see also Gui v. Ridge*, No. 3:CV-03-1965, 2004 WL 1920719 at *17 (M.D. Pa. Aug. 13, 2004) (ordering the noncitizen's release where the government failed to rebut the absence of a significant likelihood of removal); *AbdelMuhti v. Ashcroft*, 314 F. Supp. 2d 418, 430—31 (M.D. Pa. 2004) (ordering release of the noncitizen where he showed, and the government failed to rebut, "substantial evidence that removal is unlikely in the reasonably foreseeable future").

CLAIM FOR RELIEF

COUNT ONE:

PETITIONER'S PROLONGED DETENTION VIOLATES THE UNITED STATES CONSTITUTION

~~32.~~
33. I reallege and incorporate by reference each and every allegation set forth in the preceding paragraphs.

~~33.~~
34. Noncitizens who have been detained by DHS pursuant to its statutory authority under 8 U.S.C. § 1231(a) for over six months must be released from custody if there is no significant likelihood that they will be removed in the reasonably foreseeable future.

~~34.~~
35. Continuing to detain me under 8 U.S.C. § 1231(a)(6) while there is no significant likelihood of my removal in the reasonably foreseeable future deprives me of my "strong interest in liberty," and therefore violates the Fifth Amendment of the United

States Constitution. U.S. v. Salerno, 481 U.S. 739, 750 (1987).
It further poses actual and substantial hardships and irreparable injuries to me

35. While I have been detained, I have developed mental problems, including, extreme anxiety, depression and stress. All of these problems has made me suicidal. I have attempted to suicide and have have many suicidal ideations. There are many times when I have felt like I cannot become still and that I am going to die. For a long time, I have had extreme trouble sleeping. The ICE facilities' mental health department has prescribed several different medication for me, and I have taken those medications. However, they have not been able to avail me of my mental health problems I have been diagnosed with several mental health problems due to my incarceration/detainment in ICE custody. For example, I have had diagnoses of high level of Depression, Anxiety, Suicidal ideation and have have suicide attempts and other Mental illnesses such as altered Mental State. ~~See~~ Exhibit G. ⁶⁶ ~~Copies of Mental Health Records.~~ ⁷⁷

36. My detainment in ICE custody has also taken

a lot of my youthful time from my educational development. Prior to ICE taking me into Custody, while I was in prison, I was attending college classes to obtain a Bachelor's Degree. The college was provided by Bard College, it's Bard Prison Initiative (BPI) mission. I had obtained a total of 106 credits from BPI. I was a Senior Project and 14 credits short of obtaining my Bachelor's Degree. Prior to my Custody, I had planned on Obtaining my Bachelor's and then working on becoming a Computer Scientist and a Short Story writer. My precious time is being wasted. This Shows that I am not a danger to the Community; if anything, I would be a Contributor to the Community. My Bard College Professors/instructors attest to my hard work in School and my helping people Succeed. See Exhibit G: Bard College Credit Sheets and Transcripts.

~~my Bachelor's Degree. Prior to my custody, I had planned on obtaining my Bachelor's and then working on becoming a computer scientist and a short story writer. My precious time is being wasted. This shows that I am not a danger to the community; if anything, I would be a contributor to the community. My Bard College professors/instructors attest to my hard work in school and my helping people succeed. See Exhibit H: Bard College Credit Sheets and Transcripts. The only reason you see my grades drop in one semester (semester) is because of the thought of my detainment by ICE after my release from department of corrections.~~

³⁷ I have no adequate remedy at law other than the instant petition for a writ of habeas corpus.

PRAYER FOR RELIEF

WHEREFORE, I pray that this Court grants the following relief:

1. Assume jurisdiction of this matter;
2. Use its authority under 28 U.S.C. § 2243 to:
 - a. Order the Respondent to file an Answer and Return within 3 days of the filing of the petition, unless they can show good cause for additional time;
 - i. Why Respondents believe my ongoing detention is lawful; and ii. Why Respondents believe this Court should not grant relief sought herein, with a requirement that Respondents produce any evidence to support their belief that my removal is reasonably foreseeable;
 - b. Order Petitioner's Reply be filed within 30 days after the Court sets the deadline for Respondent's Answer and Return;

- c. Order Respondents to ensure I receive all filings in a timely manner in order to facilitate prompt briefing.
3. Issue a writ of habeas corpus ordering the Respondent to immediately release Petitioner with reasonable terms of supervised release; and
4. Enjoin the Respondents from re-detaining me without first establishing, in this Court, by a preponderance of the evidence, that my removal has become reasonably foreseeable; and
5. Grant any further relief that this Court deems just and proper.

I affirm, under penalty of perjury, that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct.

Respectfully Submitted,



Faheem Abdul Jaleel, Pro Se
Lewisburg FCI
2400 Robert F. Miller Drive
P.O. Box 1000
Lewisburg, PA 17837

DATED: February 10, 2026
Harrisburg, PA

Faheem Abdul Jaleel
Petitioner,

v.
Jessica Sage et al
Respondent


Cover Letter

Enclosed, please find my habeas corpus petition and the documents pertaining to it in the order numerated below.

1. CERTIFICATE OF SERVICE
2. habeas corpus petition
3. Exhibits related to my habeas corpus petition
4. CIVIL COVER SHEET
5. Consent to Jurisdiction form
6. MOTION TO PROCEED IN FORMA PAUPERIS and Resident Account Summary in support
7. ~~8.~~ USM-285 PROCESS RECEIPT AND RETURNS

I am writing parts of my habeas corpus petition and other documents with a pen rather than typing on a computer or type writer because in the facility I am in (Lewisburg FCI) we are treated like federal prisoners, i.e., denied access to such computers. We are also denied unlined paper.

Date: 02/10/2026



Faheem Abdul Jaleel

CERTIFICATE OF SERVICE

I, Faheem Abdul Jaleel, do hereby certify that I placed the original and two copies of VERIFIED PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. SECTION 2241

in the outgoing mail system of
Lewisburg FCI
2400 Robert F. Miller Drive
P.O. Box 1000
Lewisburg, PA 17837

to be sent to
Sylvia H. Rambo
US Courthouse
1501 N. 6th Street
Box 101
Harrisburg, PA 17102
via regular mail.

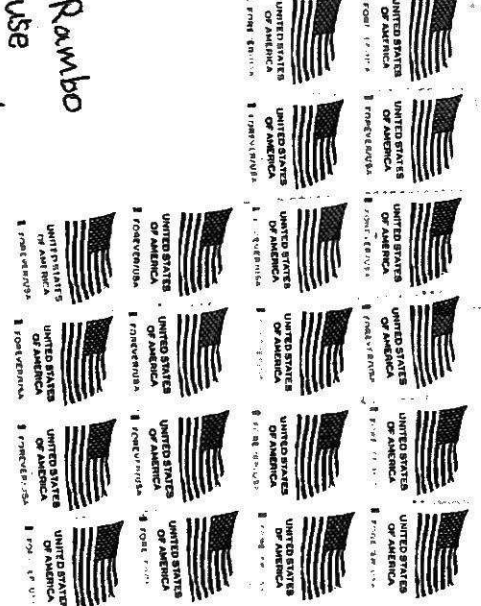

Faheem Abdul Jaleel, Pro Se

Date: 02/ /2026

Invoice Number
United States Penitentiary
P.O. Box 1000
Lewisburg, PA 17831

~~Invoice Number~~
~~United States Penitentiary~~
~~P.O. Box 1000~~
~~Lewisburg, PA 17831~~

RECEIVED
HARRISBURG, PA
FEB 18 2026
PER DEPT CLERK



Sylvia H. Rambo
US Courthouse
1501 N. 6th Street
Box 101
Harrisburg, PA 17102

Legal
Mail

