

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

UNITED STATES DISTRICT COURT

for the

S. DISTRICT COURT
BRUNSWICK DIV.

FEB 26 A 10: 54

Hussam Majed Youssef Ghanim
Petitioner

K ATM
SO. DIST. OF GA.

v.
Pam Bowdi, Government Attorney of US Kristi
Noem, Secretary of DHS Todd Iyone, Acting
Director of US ICE Warden, D. Ray James ICE
Respondent
(name of warden or authorized person having custody of petitioner)

Case No.

5:26 CV 272
(Supplied by Clerk of Court)

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: Hussam Majed Youssef Ghanim
(b) Other names you have used: N/A
2. Place of confinement:
(a) Name of institution: Folkston D. Ray ICE processing Center
(b) Address: 3262 Highway 252, P.O. Box 548, Folkston, GA 31537
(c) Your identification number: A- [REDACTED]
3. Are you currently being held on orders by:
☒ Federal authorities ☐ State authorities ☐ Other - explain: _____
4. Are you currently:
☐ A pretrial detainee (waiting for trial on criminal charges)
☐ Serving a sentence (incarceration, parole, probation, etc.) after having been convicted of a crime
If you are currently serving a sentence, provide:
(a) Name and location of court that sentenced you: _____
(b) Docket number of criminal case: _____
(c) Date of sentencing: _____
☒ Being held on an immigration charge
☐ Other (explain): _____

Decision or Action You Are Challenging

5. What are you challenging in this petition:
☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

- ☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
☐ Disciplinary proceedings
☐ Other (explain): _____

6. Provide more information about the decision or action you are challenging:

- (a) Name and location of the agency or court: Service (USCIS) US Citizenship and Immigration
(b) Docket number, case number, or opinion number: A- [REDACTED]
(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed):
18 months in detention without any individualized opportunity
for release from detention.
(d) Date of the decision or action: Sep. 1, 2024 - present

Your Earlier Challenges of the Decision or Action

7. **First appeal**

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☐ Yes ☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not appeal: _____

8. **Second appeal**

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☐ Yes ☒ No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a second appeal: _____

9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☐ Yes

☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a third appeal: _____

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes

☒ No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☐ Yes

☐ No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

- (b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes

☐ No

If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

- (c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: _____

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☒ Yes

☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: 09/01/2024

(b) Date of the removal or reinstatement order: 10/29/2024

(c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes

☒ No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

(1) Date of filing: _____

(2) Case number: _____

(3) Result: _____

(4) Date of result: _____

(5) Issues raised: _____

(d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes

☐ No

If "Yes," provide:

(1) Name of court: _____

(2) Date of filing: _____

(3) Case number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☐ Yes

☒ No

If "Yes," provide:

(a) Kind of petition, motion, or application: _____

(b) Name of the authority, agency, or court: _____

(c) Date of filing: _____

(d) Docket number, case number, or opinion number: _____

(e) Result: _____

(f) Date of result: _____

(g) Issues raised: _____

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

GROUND ONE: I'm stuck in detention without any process or any movement.

(a) Supporting facts (Be brief. Do not cite cases or law.):

I received a deportation order in Oct. 29, 2024 from state of Mississippi, and after six months I was transferred to Atlanta airport on May. 5, 2025, but I refused deportation because of my fear of certain death, and now for almost nine months I have not been deported again.

(b) Did you present Ground One in all appeals that were available to you?

☐ Yes

☒ No

GROUND TWO: changed the power or government in Syria.

(a) Supporting facts (Be brief. Do not cite cases or law.):

[REDACTED]

(b) Did you present Ground Two in all appeals that were available to you?

☐ Yes

☒ No

GROUND THREE: my healthy conditions.

(a) Supporting facts (Be brief. Do not cite cases or law.):

I suffer from several heart condition and underwent heart surgery ~~two~~ ^{few} year ago and I suffer from rapid heartbeats and irregularity (internal fibrillation). I experienced several heart attacks during my detention and was transferred to the hospital several times.

(b) Did you present Ground Three in all appeals that were available to you?

☐ Yes

☒ No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

GROUND FOUR:

(a) Supporting facts (Be brief. Do not cite cases or law.):

(b) Did you present Ground Four in all appeals that were available to you?

☐ Yes

☐ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: By the new government all grounds happen in this time, so, I can't make any appeals, also I don't have enough time to make any things for my case.

Request for Relief

15. State exactly what you want the court to do: I request that you grant me TPS or Baned until the situation in my country stabilizes, or help me to depart to third country like Venezuela, Brazil or Mouritania. where I have people who can care for me.

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

I declare 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. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 02/11/2026



Signature of Petitioner

Signature of Attorney or other authorized person, if any

Detainee Fund Special Withdrawal Form
Folkston ICE Processing Center



Detainee Name Nombre del detenido <u>Muhammad Ghamim</u>	Dormitory Bunk <u>[Redacted]</u>
Country Pais <u>Syria</u>	Alien Number Detenido # <u>A-[Redacted]</u>

Please accept this memo as my request to withdraw: \$ 5.00 from my
 Por favor, acepte esta nota como mi solicitud para retirar de mi

detainee trust fund account for the purpose of The purpose is to pay fees
 cuenta del fondo fiduciario para detenidos con el propósito de
for the Federal Authorities to continue my case.
(Habeas Corpus Fees)

Please make the check payable to: Clerk of Court
 Por favor, haga el cheque a nombre de:

Please mail the check to:

Por favor envíe el cheque a:

(Name) nombre Clerk of Court U.S. District Court of the South District of Georgia
 (Address) dirección P.O. Box 1636 Waycross Division.
 (City, State, Zip) Ciudad, Estado, código postal Brunswick, GA 31521

Requested by (Detainee Signature)
 Firma de detenidos

Requested Date
 Fecha Solicitada

 This Section Below to be completed by GEO Staff only Esta sección a continuación debe ser
 completada solo por el personal de GEO

J. Mosley
 Received by (Officer Signature)

2-24-2026
 Date

[Signature]
 Received by (Shift Supervisor Signature)

02.24.2026
 Date

[Signature]
 Warden or Designee Signature

2-24-26
 Date

[Signature]
 AWP

02/24/2026
 Date

Trust Fund Check Number Issued:

Date Issued:

☐ Approved ☐ Disapproved If Disapproved, please provide comments.

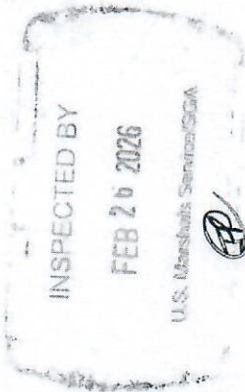


UNITED STATES
POSTAL SERVICE®

Document 1

Filed 02/26/26 Page 11 of 11

PRIORITY
MAIL®



FLAT RATE ENVELOPE

ONE RATE ■ ANY WEIGHT

To schedule free Package Pickup,
scan the QR code.



USPS.COM/PICKUP

TRACKED ■ INSURED



PS00001000014

EP14F November 2025
OD: 12 1/2 x 9 1/2

VISIT US AT USPS.COM®
ORDER FREE SUPPLIES ONLINE

For Domestic shipments, the maximum weight is 70 lbs. For international shipments, the maximum weight is 20 lbs.