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**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

MOHAMMED ABDIRAHMAN ABDI
Petitioner,

Case No. 02-26-CV-1734

PETITION FOR WRIT OF HABEAS CORPUS

v.
James Tadman, Sheriff, Polk County, MN;
David Easterwood, Director of St. Paul
Field Office, U.S. Immigration and
Customs Enforcement; Kristi Noem, Secretary
of the U.S. Department of Homeland Security;
and Pamela Bondi, Attorney General of the
United States, in their official capacities,
Respondents.

INTRODUCTION

1. Petitioner Mohammed Abdirahman Abdi (“Mr. Abdi”) is unlawfully detained in the physical and legal custody of the Respondents in Polk County Jail in Crookston, Minnesota. This case presents a fundamental question of statutory interpretation: whether Petitioner’s detention is governed by the mandatory detention provisions in 8 U.S.C. §1225(b) or the discretionary detention framework of the 8 U.S.C § 1226(a).

2. On or around February 22, 2026, U.S. Immigration and Customs Enforcement (“ICE”), a component of the Department of Homeland Security (“DHS”), and/or other federal agents acting on ICE’s behalf arrested Petitioner without a warrant. He has been detained since February 22, 2026, and has been incorrectly deemed ineligible for bond and subject to mandatory detention under current Department of Homeland Security (“DHS”) policy.

3. On information and belief, on January 13, 2026, Chief Immigration Judge Teresa L. Riley issued guidance stating that *Maldonado Bautista* does not operate as a nationwide injunction and does not supersede *Matter of Yajure Hurtado*. The guidance directs immigration judges to continue treating *Yajure Hurtado* as binding precedent and asserts that the declaratory judgment in *Maldonado Bautista* does not mandate any specific action. The court in *Maldonado Bautista* has since vacated *Matter of Yajure-Hurtado*. Notwithstanding that development, there is substantial reason to believe that the Immigration Court will continue to deny Mr. Abdi a bond hearing or release him from custody. Accordingly, to vindicate Petitioner’s statutory and constitutional rights, this Court should grant the instant Petition for a Writ of Habeas Corpus.

4. Absent an order from this Court, Petitioner will remain unlawfully detained for the duration of his removal proceedings.

5. Petitioner asks this Court to find that Petitioner was misclassified as a noncitizen seeking admission under 8 U.S.C. § 1225(b)(2), assume jurisdiction over this matter, and order Petitioner’s release from unlawful detention.

JURISDICTION

6. This action arises under the Constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*

7. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause).

8. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 *et seq.*, the Declaratory Judgment Act, 28 U.S.C. § 2201 *et seq.*, and the All Writs Act, 28 U.S.C. § 1651.

VENUE

9. Venue is proper because Petitioner is detained at Polk County Jail in Crookston, Minnesota, which is within the jurisdiction of this District.

REQUIREMENTS OF 28 U.S.C. § 2243

10. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents “forthwith,” unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return “within three days unless for good cause additional time, not exceeding twenty days, is allowed.” *Id.* (emphasis added).

11. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as “perhaps the most important writ known to the constitutional law of England, affording as

it does a swift and imperative remedy in all cases of illegal restraint or confinement.” Fay v. Noia, 372 U.S. 391, 400 (1963) (emphasis added).

PARTIES

12. Petitioner is a noncitizen. Currently, he is detained at Polk County Jail in Crookston, Minnesota. He is in the custody, and under the direct control, of Respondents and their agents.

13. Respondent James Tadman is the Sheriff of Polk County, where Polk County Jail is located and he has immediate physical custody of Petitioner pursuant to the facility’s contract with U.S. Immigration and Customs Enforcement to detain noncitizens and is a legal custodian of Petitioner. Respondent Tadman is a legal custodian of Petitioner.

14. Respondent David Easterwood is sued in his official capacity as the Director of the St. Paul Field Office of U.S. Immigration and Customs Enforcement. Respondent Olson is a legal custodian of Petitioner and has authority to release her.

15. Respondent Kristi Noem is sued in her official capacity as the Secretary of the U.S. Department of Homeland Security (DHS). In this capacity, Respondent Noem is responsible for the implementation and enforcement of the Immigration and Nationality Act, and oversees U.S. Immigration and Customs Enforcement, the component agency responsible for Petitioner’s detention. Respondent Noem is a legal custodian of Petitioner.

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

courts and the BIA. Respondent Bondi is a legal custodian of Petitioner.

STATEMENT OF FACTS

17. Petitioner Mohammed Abdirahman Abdi is a native and citizen of Somalia. Petitioner entered the United States without inspection on or around February 02, 2024.

18. He was served with a Notice to Appear initiating removal proceedings against him on or around February 02, 2024, alleging that he is “an alien present in the United States who has not been admitted or paroled.” See, Exhibit “1”

19. Petitioner has timely filed an I-589 Application for Asylum, Withholding of Removal, and Convention Against Torture protection (“CAT”), which is currently pending before Executive Office for Immigration Review (“EOIR”).

20. Petitioner sought asylum and related relief because he suffered past persecution in Somalia and has a well-founded fear of future persecution if returned there.

21. Mr. Abdi has fully complied with all immigration requirements, including attending scheduled hearings, reporting to ICE check-ins as required, and maintaining communication with DHS and his legal representatives. Mr. Abdi has no criminal history whatsoever. He is 31 years old.

22. In light of DHS’s renewed enforcement posture and fearing imminent detention and deportation to Somalia without a meaningful opportunity to present his pending protection claims, Petitioner panicked and attempted to flee to Canada to avoid return to the country where he was previously persecuted.

23. Canadian authorities immediately returned Petitioner to the United States pursuant to the Safe Third Country Agreement (“STCA”). Petitioner has remained detained

since that time.

24. U.S. Immigration and Customs Enforcement (“ICE”) and/or other federal agents acting on ICE’s behalf took Mr. Abdi into custody on February 22, 2026, without a warrant.

25. Mr. Abdi is currently being held in the Polk County Jail in Crookston, Minnesota in ICE custody pending full removal proceedings. On information and belief, Mr. Abdi is eligible for relief from removal.

26. As a person arrested inside the United States and held in civil immigration detention for pending removal proceedings, Petitioner is subject to detention, if at all, pursuant to 8 U.S.C. § 1226. However, under current DHS and EOIR policy, Petitioner has been misclassified as subject to mandatory detention under 8 U.S.C. § 1125(b)(2), making him ineligible for bond.

27. On April 30, 2025, the Department of Homeland Security issued a press release entitled *100 Days of Fighting Fake News*.¹ In that document, DHS referenced civil immigration detention and the present administration’s heavy reliance on civil detention to accomplish its political aims. Specifically, the document states:

The reality is that **prison isn’t supposed to be fun. It’s a necessary measure to protect society and punish bad guys.** It is not meant to be comfortable. **What’s more: prison can be avoided by self-deportation.** CBP Home makes it simple and easy. If you are a criminal alien and we have to deport you, you could end up in Guantanamo Bay or CECOT. **Leave now.**

¹ Available at: <https://www.dhs.gov/news/2025/04/30/100-days-fighting-fake-news> (attached as Exhibit 2).

Exhibit 2 (emphasis added). In addition, President Donald Trump has been repeatedly and recently referring to African immigrants living in Minnesota as fraudsters who all deserve to be deported, while also attacking a political enemy in Minnesota (Governor Walz).

28. Myriad courts around the country have granted habeas corpus petitions and/or enjoined the current administration's attempts to use civil detention punitively against noncitizens. *See, e.g., Abuelhawa v. Noem*, No. 4:25-CV-04128, 2025 WL 2937692, at *8-9 (S.D. Tex. Oct. 16, 2025); *Phong Van Do v. Bondi*, No. 4:25-CV-05643, ECF No. 10 (Slip Op.) (S.D. Tex. Dec. 18, 2025); *Bon Van Nguyen v. Bondi*, No. 4:25-CV-05827, ECF No. 11 (Slip Op.) (S.D. Tex. Dec. 19, 2025); *Dang Pham v. Bondi*, No. 4:25-CV-05765-H, ECF No. 12 (Slip Op.) (S.D. Tex. Jan. 9, 2026); *Mohammed H. v. Trump*, No.: 25-CV-1576-JWB-DTS, --- F. Supp. 3d ---, 2025 WL 1692739, at *5 (D. Minn. June 17, 2025) ("Punishing Petitioner for protected speech or using him as an example to intimidate other students into self-deportation is abusive and does not reflect legitimate immigration detention purposes."); *Mahdawi v. Trump*, 781 F. Supp. 3d 214, 231-32 (D. Vt. Apr. 30, 2021) (recognizing that immigration detention cannot be motivated by the desire to punish speech or to deter others from speaking); *Ozturk*, 779 F. Supp. 3d 462, 493 ("So long as detention is motivated by those goals, and not a desire for punishment, the Court is generally required to defer to the political branches on the administration of the immigration system."); *see also Fong Yue Ting v. United States*, 149 U.S. 698, 730 (1893) ("The order of deportation is not a punishment"); *Roble v. Bondi*, No. 25-cv-3196, 2025

WL 2443453 (D. Minn. Aug. 25, 2025) (ordering release and characterizing the government's actions as "Kafkaesque"); *Sarail A. v. Bondi*, No. 25-CV-2144, 2025 WL 2533673 (D. Minn. Sept. 3, 2025) (ordering release); *Sonam T. v. Bondi*, No. 25-CV-2834, *slip op.*, ECF No. 19 (D. Minn. Sept. 16, 2025) (R&R recommending order of release); *see also Sonam T. v. Bondi*, No. 25-CV-2834, ECF No. 25 (D. Minn. Sept. 19, 2025) (ordering release); *Mehran S. v. Bondi*, No. 25-CV-3724, ECF No. 11 (D. Minn. Sept. 29, 2025) (ordering release); *Omar J. v. Bondi*, No. 25-CV-3719 (D. Minn. Sept. 29, 2025), ECF No. 11 (ordering release); *Yee S. v. Bondi*, No. 25-CV-02782-JMB-DLM (D. Minn. Oct. 9, 2025), ECF No. 13 (granting habeas petition 4 days after TRO and motion to expedite was filed); *Constantinovici v. Bondi*, No. 3:25-CV-02405-RBM-AHG (S.D. Cal. Oct. 10, 2025), ECF No. 15 (granting habeas petition less than one month after filing).

29. Petitioner thus seeks a declaratory judgment prompting the correct classification of his detention, making him bond-eligible, and thus releasing him from custody pending his full removal proceedings.

LEGAL FRAMEWORK

30. The Fifth Amendment's Due Process Clause specifically forbids the government to "deprive[]" any "person . . . of . . . liberty . . . without due process of law." U.S. Const. amend. V.

31. The Due Process Clause of the Fifth Amendment to the U.S. Constitution "applies to all 'persons' within the United States, including aliens, whether their presence is lawful, unlawful, temporary, or permanent." *Zadvydas v. Davis*, 533 U.S. 678, 693

(2001).

32. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty” protected by the Due Process Clause. *Zadvydas*, 533 U.S. at 678.

33. The Supreme Court, thus, “has repeatedly recognized that civil commitment for any purpose constitutes a significant deprivation of liberty that requires due process protection,” including an individualized detention hearing. *Addington v. Texas*, 441 U.S. 418, 425 (1979). Further, “the interest in being free from physical detention” is “the most elemental of liberty interests.” *Hamdi v. Rumsfeld*, 542 U.S. 507, 529, 531.

34. In recent decades, the U.S. immigration system has implemented this balance of due process protections through a network of three mutually exclusive detention statutes.

35. First, at the border, individuals “seeking admission” who are placed into removal proceedings are subject to detention without a bond hearing under 8 U.S.C. § 1225(b)(2). See *Jennings v. Rodriguez*, 583 U.S. 281, 287 (2018) (describing § 1225 as relating to “borders and port of entry”). Detained individuals falling under this statute may request release through humanitarian parole under 8 U.S.C. § 1182(d)(5)(A).

36. Second, noncitizens arrested inside the U.S. are generally placed into removal proceedings under 8 U.S.C. § 1229a, during which an Immigration Judge (an “IJ”)—and later potentially the Board of Immigration Appeals (the “BIA”) and a U.S. Court of Appeals—will decide whether or not the person should be deported. During § 1229(a) proceedings, a noncitizen may apply for forms of relief such as asylum, withholding of removal, or cancellation of removal. The IJ will hold a series of hearings to

determine if the individual is eligible for relief or eligible for deportation, which can take months or years.

37. While § 1229(a) proceedings are ongoing, noncitizens are generally subject to the detention authority of 8 U.S.C. § 1226. See *Jennings*, 583 U.S. at 288-89 (describing § 1226 detention as relating to people “inside the United States” and “present in the country”). Most of these individuals are eligible for release on bond and conditions under § 1226(a), and they are consequently entitled to a custody redetermination (a “bond hearing”) before an IJ to decide whether they should be detained or released. See 8 C.F.R. §§ 1003.19(a), 1236.1(d).

38. Third, if a noncitizen completes their removal proceedings and all appeals, and is ordered removed, they are subject to detention under 8 U.S.C. § 1231 while the government attempts to remove them.

39. This landscape—in which noncitizens arrested inside the U.S. are generally eligible for a bond hearing and release during immigration proceedings—has existed essentially in its current form since Congress passed the Illegal Immigration Reform and Immigrant Responsibility Act of 1996 (IIRIRA), Pub. L. No. 104-208, Div. C, § 3003, 110 Stat. 3009-546, 3009-585 to 3009-587 (codified at 8 U.S.C. § 1226).

40. Further, this eligibility for a bond hearing and potential release has applied to noncitizens arrested in the U.S., regardless of whether they initially entered the country with or without inspection.

41. However, beginning in 2022, the Immigration Court in Tacoma, Washington began to misclassify § 1226 detainees arrested inside the U.S. as mandatory detainees under

§ 1225 solely because they initially entered the country without inspection. See *Rodriguez v. Bostock*, 779 F. Supp. 3d 1239, 1244 (W.D. Wash. 2025). The U.S. District Court for the Western District of Washington ruled that this practice was likely illegal and ordered a bond hearing for a wrongfully detained litigant. See *id.* at 1263.

42. On July 8, 2025, the Department of Homeland Security and the Department of Justice adopted the Tacoma Immigration Court's unlawful practice of misclassifying bond-eligible § 1226 detainees as mandatory § 1225(b)(2) detainees and refuses to conduct bond hearings on that basis. See Interim Guidance Regarding Detention Authority for Applicants for Admission, <https://www.aila.org/ice-memo-interim-guidance-regarding-detention-authority-for-applications-for-admission>.

43. On September 5, 2025, the Board of Immigration Appeals issued a precedential decision requiring Immigration Judges to misclassify bond-eligible § 1226 detainees as mandatory § 1225(b)(2) detainees. See *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).

44. Most federal courts have already ruled that the Board of Immigration Appeals' decision in *Matter of Yajure Hurtado* is not entitled to any deference under *Loper Bright Enters. v. Raimondo*, 603 U.S. 369, 412-13 (2024), and have rejected the BIA's decision as contrary to law.²

² Over 250 courts have adopted Petitioner's correct interpretation of the law. The following cases represent a small sampling of cases across the country. See *Lema Zamora v. Noem*, 2025 WL 2958879 (D. Mass. Oct. 17, 2025); *Chiliquinga Yumbillo v. Stamper*, 2025 WL 2783642 (D. Me. Sept. 30, 2025); *Da Saliva v. ICE*, 2025 WL 2778083 (D.N.H. Sept. 29, 2025); *Ayala Casun v. Hyde*, 2025 WL 2806769 (D.R.I. Oct. 2, 2025); *Carballo Gonzalez v. Joyce*, 2025 WL 2961626 (S.D.N.Y. Oct. 19, 2025); *Artiga v. Genalo*, 2025 WL 2829434 (E.D.N.Y. Oct. 5, 2025); *Rivera Zumba v. Bondi*, 2025 WL 2753496 (D.N.J. Sept. 26, 2025); *Leal-Hernandez v. Noem*, 2025 WL 2430025 (D. Md. Aug. 24, 2025); *Singh v. Lyons*, 2025 WL 2932635 (E.D. Va. Oct. 14, 2025);

45. Many federal courts have found that noncitizens in positions like Mr. Abdi's are not required to exhaust administrative remedies, including a bond hearing in immigration court, as "given the Government's position and the BIA's recent decision in *Yajure Hurtado* . . . request[ing] a bond hearing would likely be futile." *Oropeza v. Noem*, 2025 LEXIS 201993, at *6 (W.D. Mich. Nov. 21, 2025); *see also Eliseo A.A. v. Olson*, 2025 WL 2886729 (D. Minn. Oct. 8, 2025); *Adonay v. Noem*, 2025 WL 3157839 (D. Minn. Nov. 12, 2025); *Mairena-Munguia v. Arnott*, 2025 LEXIS 227477 (W.D. Mo. Nov. 19, 2025); *Salinas v. Woosley*, 2025 LEXIS 590056 (W.D. Ky. Nov. 20, 2025); *Figueroa v. Hermosillo*, 2025 LEXIS 227966 (W.D. Wash. Nov. 19, 2025); *Serrato v. Anderson*, 2025 LEXIS 228936 (D. Idaho Nov. 19, 2025).

46. Mr. Abdi is a class member in *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873 SSS-BFM (C.D. Cal.). In *Maldonado Bautista* the court granted summary judgement and certified the Bond Eligible Class, defined as: All noncitizens in the United States without lawful status who (1) have entered or will enter the United States without inspection; (2) were not or will not be apprehended upon arrival; and (3) are not or will not be subject to detention under 8 U.S.C. § 1226(c), § 1225(b)(1), or § 1231 at the time the

Lopez Santos v. Noem, 2025 WL 2642278 (W.D. La. Sept. 11, 2025); *Lopez Arevalo v. Ripa*, 2025 WL 2691828 (W.D. Tex. Sept. 22, 2025); *Buenrostro Mendez v. Bondi*, 2025 WL 2886346 (S.D. Tex. Oct. 7, 2025); *Singh v. Lewis*, 2025 WL 2699219 (W.D. Ky. Sept. 22, 2025); *Contreras Lomeli v. Raycraft*, 2025 WL 2976739 (E.D. Mich. Oct. 21, 2025); *Sanchez Alvarez v. Noem*, 2025 WL 2942648 (W.D. Mich. Oct. 17, 2025); *Morales Chavez v. Director*, 2025 WL 2959617 (N.D. Ohio Oct. 20, 2025); *Patel v. Crowley*, 2025 WL 2996787 (N.D. Ill. Oct. 24, 2025); *Campos Leon v. Forestal*, 2025 WL 2694763 (S.D. Ind. Sept. 22, 2025); *Hernandez Marcelo v. Trump*, (S.D. Iowa Sept. 10, 2025); *A.A. v. Olson*, 2025 WL 2866729 (D. Minn. October 8, 2025); *Lorenzo Perez v. Kramer*, 2025 WL 2624387 (D. Neb. Sept. 11, 2025); *Echevarria v. Bondi*, 2025 WL 2821282 (D. Ariz. Oct. 3, 2025); *Sabi Polo v. Chestnut*, 2025 WL 2959346 (E.D. Cal. Oct. 17, 2025); *Garcia Cortes v. Noem*, 2025 WL 2652880 (D. Colo. Sept. 16, 2025); *Salazar v. Dedos*, 2025 WL 2676729 (D.N.M. Sept. 17, 2025); *Paredes Padilla v. Galovich*, 2025 WL 3251446 (W.D. Wis. Nov. 21, 2025).

Department of Homeland Security makes an initial custody determination. *Maldonado Bautista v. Santacruz*, No. 5:25-CV-01873-SSS-BFM, --- F. Supp. 3d ----, 2025 WL 3288403, at *9 (C.D. Cal. Nov. 25, 2025). The court has since vacated *Matter of Yajure-Hurtado*, further confirming that individuals within the certified class are not subject to mandatory detention on that basis.

47. The Supreme Court has repeatedly emphasized that mandatory detention statutes are subject to constitutional limits. In *Jennings v. Rodriguez*, the Court addressed whether bond hearings could be read into §§ 1225 and 1226 as a matter of statutory interpretation. The Court expressly declined to resolve the constitutional question whether prolonged detention without a hearing is permissible. 583 U.S. at 308. *Belsai* answered that question in the negative, holding that once detention becomes prolonged, due process requires an individualized custody determination, even when the statute is silent.

48. Every day, federal courts continue to “join[] [the] chorus” of courts rejecting Respondents’ erroneous interpretation of the law, unlawfully detaining bond-eligible noncitizens like Mr. Abdi. *See Dominguez Sanchez v. Bondi*, No. 25-cv-03682 (D. Minn. Oct. 1, 2025).³

CLAIMS FOR RELIEF

COUNT ONE

Violation of Fifth Amendment Right to Due Process

49. The allegations in the above paragraphs are realleged and incorporated

³ *Id.*

herein.

50. Because Petitioner is subject to detention, if at all, under 8 U.S.C. §1226(a), yet current DHS policy has Petitioner classified as a mandatory detainee under 8 U.S.C. § 1225(b)(2), the Due Process Clause of the Fifth Amendment to the United States Constitution requires that he be released on bond.

51. Thus, Petitioner's detention violates the Due Process Clause of the Fifth Amendment.

COUNT TWO

Violation of 8 U.S.C. § 1226(a) and Implementing Regulations

52. The allegations in the above paragraphs are realleged and incorporated herein.

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

54. Under 8 U.S.C. § 1226(a) and its associated regulations, Petitioner is entitled to bond, and any bond determination would be denied solely based on a purported lack of jurisdiction by the immigration court. *See* 8 C.F.R. §§ 236.1(d), 1236.1, 1003.19(a)-(f); see also *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).

55. For these reasons, Petitioner's detention is therefore unlawful.

COUNT THREE

Violation of Administrative Procedure Act (5 U.S.C. § 706)

56. The allegations in the above paragraphs are realleged and incorporated herein.

57. Petitioner is being detained without a bond hearing pursuant to the BIA's

decision in *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025).

58. The BIA's decision in *Matter of Yajure Hurtado* is unlawful because it violates the Administrative Procedure Act because the BIA's decision is arbitrary, capricious, and contrary to law.

59. Petitioner's detention is therefore unlawful.

PRAYER FOR RELIEF

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

- (1) Assume jurisdiction over this matter,
- (2) Issue an Order to Show Cause ordering Respondent to show cause why this Petition should not be granted within three days;
- (3) Declare that Petitioner's warrantless arrest and detention violates the Due Process Clause of the Fifth Amendment, 8 U.S.C. § 1226, and/or 5 U.S.C. § 706;
- (4) Issue a Writ of Habeas Corpus ordering Respondents to release Petitioner immediately;
- (5) Enjoin respondents from removing, transferring, or otherwise facilitating the removal of Petitioner from the District of Minnesota before the ordered bond hearing;
- (6) Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, and on any other basis justified under law; and
- (7) Grant any further relief this Court deems just and proper.

Respectfully submitted,

Dated: March 4, 2026

/s/Abdinasir Abdullahi

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

I represent Petitioner, Mohammed Abdirahman Abdi, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 4th day of March 2026.

/s/Abdinasir M Abdulahi
Attorney for Petitioner