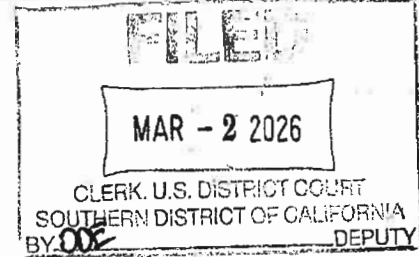


VENESIOUS TIFUH NYAH
NAME

PRISON NUMBER

Imperial Regional Detention Facility (IRDF)
PLACE OF CONFINEMENT

1572 Gateway Road Calexico CA 92231
ADDRESS



United States District Court
Southern District Of California

VENESIOUS TIFUH NYAH
(FULL NAME OF PETITIONER)

Petitioner

v.

Jeremy Casey
(NAME OF WARDEN, SUPERINTENDENT, JAILOR, OR AUTHORIZED
PERSON HAVING CUSTODY OF PETITIONER, E.G. PAROLE OFFICER)

Respondent

and
The Attorney General of the State of
California, Additional Respondent.

Civil No. '26CV1400 RSH SBC

(TO BE FILLED IN BY CLERK OF U.S. DISTRICT COURT)

PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

1. 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 or case number (if you know): _____

(c) Date of sentencing: _____

☒ Being held on immigration charge

☐ Other (explain): _____

2. Are you currently being held on orders by:
☐ Federal authorities ☐ State authorities ☒ Other - explain: Immigration, Detention
3. What are you challenging in this petition:
☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities
☐ Pretrial detention
☒ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed
☐ Disciplinary proceedings
☐ Other (specify): _____
4. Provide more information about the decision or action you are challenging: MITC
(a) Name and location of the court or agency: DHS/ICE, IADF, 1572 Gateway Blvd Calexico CA 92231
(b) Case number, docket number or opinion number (if you know): [REDACTED]
(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed): Parole/Bond and also an appeal still pending. Also challenging my prolong stay in the detention for over 13 months. See an attachment to the warden Jeremy Casey and my ICE officer Ferrari.
(d) Date of the decision or action: Pending
5. Did you **appeal** the decision, file a grievance or seek an administrative remedy?
☒ Yes ☐ No
(a) If your answer to 5 was "Yes," give the following information:
(1) Name of court, agency or authority: DHS/ICE, IADF, 1572 Gateway Blvd Calexico CA 92231
(2) Date of filing: 11/15/2025
(3) Case number, docket number or opinion number: [REDACTED]
(4) Result: Pending
(5) Date of result: Pending
(6) Issues raised: _____

(b) If your answer to 5 was "No," explain why you did not appeal: _____

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

☐ Yes ☒ No

(a) If your answer to 6 was "Yes," give the following information:

- (1) Name of court, agency or authority: _____
 - (2) Date of filing: _____
 - (3) Case number, docket number or opinion number: _____
 - (4) Result: _____
 - (5) Date of result: _____
 - (6) Issues raised: _____
- _____
- _____
- _____
- _____

(b) If your answer to 5 was "No," explain why you did not appeal: _____

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

☐ Yes ☐ No

(a) If your answer to 7 was "Yes," give the following information:

- (1) Name of court, agency or authority: _____
 - (2) Date of filing: _____
 - (3) Case number, docket number or opinion number: _____
 - (4) Result: _____
 - (5) Date of result: _____
 - (6) Issues raised: _____
- _____

(b) If your answer to 7 was "No," explain why you did not appeal: _____

8. State *concisely* every ground on which you claim that you are being held in violation of the constitution, law or treaties of the United States. Summarize *briefly* the facts supporting each ground. If necessary, you may attach pages stating additional grounds and facts supporting same.

CAUTION: In order to proceed in the federal court, you must ordinarily first exhaust your available court remedies as to each ground on which you request action by the federal court. Moreover, if you fail to set forth all grounds in this petition, you may be barred from presenting additional grounds at a later date.

You should raise in this petition all available grounds on which you base your allegations that you are being held in custody unlawfully.

GROUND ONE: I Have Been Detained For Over 13¹³ Months

(a) Supporting FACTS (state *briefly* without citing cases or law) _____

Petitioner has been in ICE custody for over ¹³13 months a presumptively reasonable period of detention after which the alien is eligible for conditional release if he can not demonstrate that there is a significant likelihood of removal in a reasonably foreseeable future as required by law because prolong detention is unlawful and it violates the supreme courts..

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

☐ Yes ☐ No

GROUND TWO: FIFTH AMENDMENT

(a) Supporting FACTS (state briefly without citing cases or law):

Law states that the fifth amendment entitles alliens to due process in deportation proceedings which applies to all persons within the united state of America whether their presence here is lawful, unlawful, temporary or perminient.

The united state Supreme Court shovned its concerns about the constitutionality of a statutory scheme that ostensibly authorized indefinite detention. Two years later when the court upheld the constitutionality of 8.45 C.S.S 1226(c) in the Demore decision, it emphasized that for detention under the statute to be reasonable it must be before a brief period of time.

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

☐ Yes ☐ No

GROUND THREE: Petitioner is Not A Flight Risk And Also
Not A Danger to The Community And Also Having
A Sponsor

(a) Supporting FACTS (state briefly without citing cases or law): _____

The court did a background check of the petitioner and there
was no crime nor any charge against the petitioner so the
petitioner is not a flight and also not a danger to
the community and not a threat to the U.S National
Security so the petitioner promise to be a law abiding
alien and also a sponsor who will ensure that the
petitioner attend every immigration court proceedings

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

☐ Yes ☐ No

GROUND FOUR: Immigration Proceedings And A Prayer For Relief If Being Released-

(a) **Supporting FACTS** (state *briefly* without citing cases or law): On the 19th of December 2024 petitioner cross the border in to the united state, on the 21st of October 2025 Immigration judge order petitioner an order of Removal as a result of this petitioner appealed the decision of the judge and there is no pending removal proceedings against him therefore petitioner respectfully request that the court
i) Issued a writ of Habeas Corpus
ii) Order petitioner immediate release from ICE custody by bond/parole under appropriate condition of supervision
iii) Grant such order and further Relief as this Court seems just and proper.

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

☐ Yes ☐ No

9. If any of the grounds listed in 4A, B, C, and D were not previously presented in any other court, state or federal, state briefly what grounds were not presented, and give your reasons for not presenting them:

10. Do you have any petition or appeal now pending in any court, either state or federal, as to the execution of sentence under attack?

☐ Yes ☐ No

11. Give the name and address, if known, of each attorney who represented you in the following stages of the execution of sentence attacked herein:

(a) In any post-conviction proceeding _____

(b) On appeal from any adverse ruling in a post-conviction proceeding _____

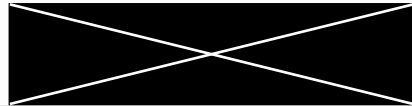
Wherefore, petitioner prays that the Court grant petitioner relief to which he may be entitled in this proceeding.

SIGNATURE OF ATTORNEY (IF ANY)

I declare under penalty of perjury that the foregoing is true and correct. Executed on

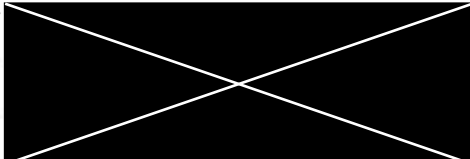
02/13/2026

(DATE)


SIGNATURE OF PETITIONER

VENESIOUS TIFUHH NYAH
IRDF 1572 Gateway Road
Calexico CA 92231Ice officer ferrari
IRDF 1564 Gateway Road
Calexico CA 92231A plea for Release From The Detention

With due respect i write to you this letter to plead for my release that may God touch your heart that way you will see into law and release me because i have over stayed in the detention for over 13 months and it has affected my health now having high blood pressure and i am not a criminal and also have a sponsor who is ready to take care of me if im release and also promise to follow up all my court proceedings and all my ice appointment.

Thanks


VENESIOUS TIFUH NYHH


IRDF 1572 Gateway Road
Calexico C.A 92231
02/16/2026

The Warden of IRDF
JEREMY CASEY
1572 Gateway Road Calexico
C.A 92231

A plea To Assist Get To my ICE Officer So
That i Can Be Release

Sir

With due respect i write to you this letter to let you know that i have been in this detention for over 13 months which i believe its against the law i therefor plead that kindly help me get to my ice officer Ferrar, to releas me. my case is stil in proceeding process and i im not a threat to the community and also have a sponsor who is ready to take good care of me while i continue my immigration proceedings and also to let you know that my prlong stay here is affecting my health now im having high blood pressure because of tomuch stress and thinking.

thanks

