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**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION**

Chintan Ashokkumar Patel (A )

Petitioner,

Case No.

GEORGE STERLING, Deputy Managing Director,
Atlanta Field Office, Immigration and Customs Enforcement
And Removal Operations ("ICE/ERO"); **TODD LYONS**,
Acting Director of Immigration and Customs Enforcement
("ICE"); U.S. IMMIGRATION AND CUSTOMS
ENFORCEMENT; **KRISTI NOEM**, Secretary of the
Department of Homeland Security ("DHS"); U.S.
DEPARTMENT OF HOMELAND SECURITY; **PAMELA
BONDI**, Attorney General of the United States;
JASON STREEVAL, Warden, Folkston ICE Processing
Center, United States Attorney.

**PETITION FOR WRIT
HABEAS CORPUS**

Respondents,

Petitioner, Chintan Ashokkumar Patel (hereinafter "the Petitioner" files Petition for Habeas Corpus and Complaint for Declaratory and Injunctive Relief, under 28 U.S.C. §§2241, (habeas corpus) 1331 (federal question), with the Administrative Procedure Act, 5 U.S.C. §702 et seq; 28 U.S.C. §2201 (Declaratory Judgment Act).

I. INTRODUCTION

Petitioner Chintan Ashokkumar Patel, by and through undersigned counsel, respectfully petitions this Court for a writ of habeas corpus to review the lawfulness of his current civil immigration detention by Respondents since December 20, 2025. Petitioner is detained at Folkston Detention Center in Folkston, Georgia, despite having pending application for immigration relief

and having no individualized determination that he poses a flight risk or danger to the community. He has never been afforded a bond hearing under 8 U.S.C. § 1226(a). His continued civil detention without an individualized custody hearing is unlawful and unconstitutional.

II. JURISDICTION AND VENUE

1. This action arises under the constitution of the United States and the Immigration and Nationality Act (INA), 8 U.S.C. §1101 et. seq.
2. This court has subject matter jurisdiction under 28 U.S.C. §§2241 (habeas corpus), U.S.C. §1331 (federal question), and Article I, §9, cl. 2 of the United States Constitution (Suspension Clause).
3. This court may grant relief under the habeas corpus statutes, 28 U.S.C. §2241 et. seq., the Declaratory Judgement Act, 28 U.S.C. §2201 et. seq., the All-Writs Act, 28 U.S.C. §1651, and the Immigration and Nationality Act, 8 U.S.C. §1252(e)(2).

III. VENUE

4. Venue is proper in the Southern District of Georgia, Waycross Division, because Petitioner is in Respondents' custody at the Folkston Detention Center in Folkston, Georgia. A substantial part of the events or omissions giving rise to Petitioner's claims occurred in this District, where Petitioner is now detained. See 28 U.S.C. § 1391(e).

IV. REQUIREMENTS OF 28 U.S.C. §§ 2241, 2243

5. The Court must grant the petition for writ of habeas corpus or issue an order to how cause (OSC) to the Respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. §

2243. If an OSC 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.*

6. 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).

7. Petitioner is “in custody” for the purpose of § 2241 because Petitioner is arrested and detained by Respondents.

V. THE PARTIES

8. Petitioner Chintan Ashokkumar Patel is a citizen of India who is currently in immigration custody in Folkston Charlton, Georgia. Petitioner is physically present within this District at the time of filing this petition.

9. Respondent George Sterling, Deputy Managing Director, Atlanta ICE Field Office. The Atlanta Field Office is responsible for local custody decisions relating to non-citizens charges with being removable from the United States, including the arrest, detention, and custody status of non-citizens. Respondent Sterling is a legal custodian of the Petitioner.

10. Respondent Todd Lyons is the acting director of U.S. Immigration and Customs and Enforcement, and he has authority over the actions of respondent Drew Bostock and ICE in general. Respondent Lyons is a legal custodian of Petitioner.

11. Respondent Kristi Noem is the Secretary of the Department of Homeland Security (DHS) and has authority over the actions of all other DHS Respondents in this case, as well as all operations of DHS. Respondent Noem is a legal custodian of Petitioner and is charged with faithfully administering the immigration laws of the United States.

12. Respondent Pamela Bondi is the Attorney General of the United States, and as such has authority over the Department of Justice and is charged with faithfully administering the immigration laws of the United States.

13. Respondent U.S. Immigration Customs Enforcement is the federal agency responsible for custody decisions relating to non-citizens charged with being removable from the United States, including the arrest, detention, and custody status of non-citizens.

14. Respondent U.S. Department of Homeland Security is the federal agency that has authority over the actions of ICE and all other DHS Respondents.

15. Respondent Warden of the Folkston ICE Processing Center, Georgia, where Petitioner is currently detained. As Warden Respondent is the official having day to day custody over Petitioner and is a proper respondent in habeas action. He is sued in his official capacity (as are all Respondents).

16. Respondent United States Attorney for the Southern District of Georgia is the federal official who, through designated assistants, represents the U.S. Government in this District. (Respondents are sued in their official capacities only.)

17. This action is commenced against all Respondents in their official capacities.

VI. LEGAL FRAMEWORK

18. Immigration detention is civil in nature and is not intended to be punitive. The U.S. Supreme Court has recognized that civil detention of noncitizens is justified only as a means to the ends of the immigration process – ensuring the person’s appearance at removal proceedings and, if a final removal order is entered, effectuating that removal. Detention should be “limited to situations where it is necessary” to serve those purposes, i.e. to prevent flight or danger to the community. Otherwise, detention becomes an arbitrary punishment, forbidden by the Fifth

Amendment. Indeed, civil immigration confinement “constitutes a significant deprivation of liberty” that triggers due process protection. Noncitizens in removal proceedings are entitled to due process of law under the Fifth Amendment, which includes both substantive limits on executive detention power and procedural guarantees of a meaningful opportunity to challenge one’s confinement.

19. Under the Immigration and Nationality Act (INA), the detention of noncitizens pending removal proceedings is governed primarily by 8 U.S.C. § 1226 for those already “in the United States,” and by 8 U.S.C. § 1225(b) for those deemed applicants for admission (including “arriving aliens” at ports of entry). Generally, § 1226(a) allows the Attorney General (now the DHS Secretary) discretion to arrest and detain a noncitizen pending removal proceedings, but also authorizes release on bond or conditional parole pending the outcome of the case, unless the person falls under certain mandatory detention categories (e.g. criminal aliens under § 1226(c)). When a person is detained under § 1226(a), he or she has the right to seek a custody redetermination (bond hearing) before an immigration judge, who can grant release if the individual does not pose a flight risk or danger. These bond determinations are case-by-case and require consideration of individualized factors such as family ties, community ties, and background.

20. In contrast, 8 U.S.C. § 1225(b) applies to “applicants for admission,” which includes (a) noncitizens who present themselves at a port of entry without valid documents, and (b) those who entered the country without inspection (EWI) and were thereafter apprehended – the law deems such individuals to be “arriving” or seeking admission even if physically inside the U.S. Section 1225(b) provides that if an immigration officer determines an arriving alien may not be clearly admissible, the alien “shall be detained” for removal proceedings under INA § 240.

There is no provision for bond hearings under § 1225; release, if any, is only by parole at the discretion of the DHS (under INA § 212(d)(5)). By regulation, immigration judges lack jurisdiction to redetermine the custody of individuals detained under § 1225(b) as applicants for admission (arriving aliens) – such detainees cannot seek bond from the immigration court. This has long been the rule for people literally arriving at the border.

21. However, in a recent precedential decision, *Matter of Yajure Hurtado*, 29 I&N Dec. 216 (BIA 2025), the Board of Immigration Appeals dramatically expanded the scope of § 1225(b) custody. The BIA “proclaimed that any person who crossed the border unlawfully and is later taken into immigration detention is no longer eligible for release on bond.” In other words, even noncitizens who entered without inspection years ago and were living in the U.S. are now classified as “applicants for admission” for custody purposes, rendering them ineligible for bond hearings just like arriving aliens at a port. The BIA reasoned that immigration judges have “no authority” to grant bond to such individuals, lest those who entered illegally end up with greater rights than those who presented at a port of entry. This decision reversed decades of prior practice and effectively] for a broad class of undocumented immigrants in removal proceedings who previously would have been bond-eligible. Petitioner falls squarely within this category. Because he originally entered without a valid visa (albeit being paroled), and was into ICE custody as an “arriving” alien, the Government’s position is that no immigration judge can grant him a bond hearing or release. His only chance at release is DHS’s grace via parole, a chance that is practically nonexistent under current ICE policies (parole has become “all but a dead letter”).

22. The Fifth Amendment’s Due Process Clause prohibits the Government from depriving an individual of liberty arbitrarily or indefinitely. Even when Congress has authorized detention

in the immigration context, detention must remain reasonable in duration and reasonably related to the Government's purpose of effectuating removal. Due process demands basic procedural safeguards. A noncitizen is entitled to a timely and meaningful opportunity to demonstrate that [he] should not be detained in the first place. Prolonged detention without any hearing or review to determine if it is justified is precisely the kind of arbitrary and indefinite deprivation of liberty that the Constitution forbids.

23. Under the Constitution and applicable law, Petitioner's continued detention must be justified by compelling reasons and subject to meaningful review. If those safeguards are absent as they are in Petitioner's case, the detention is unlawful.

VII. FACTUAL BACKGROUND

30. Petitioner Chintan Ashokkumar Patel entered the United States on or about April 30, 2024 at or near Rouses Point, New York border. *Please see Exhibit A*, Copy of Petitioner's passport.

31. On November 12, 2024, Petitioner filed defensive asylum application for asylum and withholding of removal (Form I-589) with Immigration Court, seeking protection from removal due to a fear of persecution in his home country. This application (along with requests for withholding of removal and protection under the Convention Against Torture) was denied by Immigration Judge. Appeal against the decision from Immigration Judge is pending before Board of Immigration Appeal (BIA). *See Exhibit B*, BIA Appeal Confirmation.

32. Petitioner has been victim of armed robbery. Petitioner has been cooperative with the law enforcement. *Please see Exhibit C*, Copy of Police Report. He needs to be present in the United States for further investigation. Partitioner needs to be present for the investigation. Petitioner is

also in the process of getting I-918 certified from police Department and file U Nonimmigrant visa.

33. Petitioner complied with all conditions imposed by ICE and all requirements of USCIS and the immigration courts. He has no criminal history whatsoever since his last arrival into the United States in 2024. He has no history of failing to appear for immigration appointments or hearings. Petitioner has an established residence and community connections during the time he lived in the United States. He also secured a reliable sponsor and has demonstrated a consistent commitment to obeying U.S. laws and immigration rules.

34. On or about December 20, 2025, Petitioner was detained at Folkston Detention Center in Folkston, Georgia by ICE officers, where he remains in custody. This detention was carried out without any individualized custody determination or hearing. ICE did conduct any assessment of whether Petitioner poses a flight risk or danger to the community at this time. Petitioner's ongoing detention since December 20, 2025 while his appeal with Board of Immigration Appeal (BIA), has been automatic and devoid of procedural safeguards: he was not afforded a prompt bond hearing before an immigration judge to determine if his continued detention is justified.

35. After the case of *Yajure-Hurtado*, 29 I&N Dec. 216 (BIA 2025) certain noncitizens (including those, like Petitioner who entered without inspection) are barred from applying for bond with the Immigration court since the Immigration Judge lack authority to conduct bond hearings.

VIII. NOTICE OF SUPPLEMENTARY AUTHORITY

36. Petitioner respectfully notifies the Court of a dispositive legal development. On December 18, 2025, the U.S. District Court for the Central District of California entered Final Judgment in the nationwide class action *Maldonado Bautista v. Santacruz*, No.5:2025 cv 01873.

37. The final judgment in *Maldonado Bautista* is critical to the instant petition for three reasons:

1. Finality and Preclusion: The Court rejected the Government's argument that the class certification was merely interlocutory. It entered Final Judgment on Counts I-III, certifying the class and declaring the policy unlawful. As a class member, Petitioner's rights are now adjudicated, and the Government is collaterally estopped from relitigating their detention status.
2. Futility and Exhaustion: The Court entered Final Judgment specifically because it found "troubling" evidence that the Department of Justice issued a memorandum instructing Immigration Judges to disregard the federal court's prior orders and "hold the position that Yajure-Hurtado remains good law." This judicial finding confirms that administrative exhaustion is futile, as the agency has prejudged the issue in bad faith.
3. Yajure-Hurtado is "No Longer Tenable": The Court explicitly held that "the core holding of Yajure-Hurtado cannot be squared with the [Court's] Order... Yajure-Hurtado is no longer controlling; the legal conclusion underlying the decision is no longer tenable."

38. Petitioner requests that this Court take judicial notice of this Final Judgment and grant the Writ of Habeas Corpus to enforce these established rights against the local custodian.

IX. CLAIMS FOR RELIEF

COUNT ONE: SUBSTANTIVE DUE PROCESS VIOLATION

39. Petitioner realleges and incorporates by reference paragraphs 1 through 37 above.
40. Petitioner's continued detention violates his rights to substantive due process through a deprivation of the core liberty interest in freedom from bodily restraint. He has been detained for over three months.
41. The Due Process Clause of the Fifth Amendment requires that the deprivation of Petitioner's liberty be narrowly tailored to serve a compelling government interest. While Respondents might have an interest in detaining Petitioner in order to effectuate removal, that interest does not justify the indefinite detention of Petitioner, since it is not significantly likely that she will

be removed in the reasonably foreseeable future. In *Zadvydas v. Davis*, 533 U.S. 678 (2001), court recognized that ICE may continue to detain aliens only for a period reasonably necessary to secure the alien's removal.

42. Petitioner's continued detention violates his rights under the Due Process Clause of the Fifth Amendment to the United States Constitution, which protects noncitizens, including those subject to civil immigration detention, from arbitrary and indefinite deprivations of liberty.
43. Freedom from physical detention is a core liberty interest protected by the Due Process Clause. Civil detention, while permissible in limited immigration contexts, must be reasonable in duration and directly tied to a legitimate and compelling government interest.
44. Once removal is not reasonably foreseeable, continued detention becomes arbitrary and capricious, and is therefore unconstitutional. The Court interpreted 8 U.S.C. § 1231(a)(6) to limit post-removal-order detention to a presumptively reasonable period of six months. Beyond that, the government must demonstrate that removal is significantly likely to occur in the reasonably foreseeable future.
45. Here, Respondents have not shown any valid justification for Petitioner's continued detention. Petitioner has available avenues to relief and is not significantly likely to be removed in the near future, especially given his pending asylum and VAWA-based applications and the legal barriers to removal while those are unresolved. There is no evidence that Petitioner's detention serves any purpose other than punitive or as a matter of administrative convenience. Once removal is not reasonably foreseeable, continued detention is arbitrary and capricious, and thus unconstitutional.

46. Accordingly, Petitioner's ongoing detention – lacking a particularized basis and with no end in sight – violates the Fifth Amendment's substantive due process guarantee. Petitioner asks this Court to declare his detention unconstitutional and grant the writ of habeas corpus, resulting in his immediate release (with appropriate conditions if necessary) or other such relief as the Court deems just.

COUNT TWO: PROCEDURAL DUE PROCESS VIOLATION

47. Petitioner realleges and incorporates by reference paragraphs 1 through 43 above.

48. Under the Due Process Clause of the Fifth Amendment, an alien is entitled to a timely and meaningful opportunity to demonstrate that he should not be detained. Petitioner has a strong interest in avoiding prolonged and indefinite immigration detention without meaningful review. Yet, since being taken into custody, has been deprived of a timely and meaningful opportunity to challenge his detention.

49. Petitioner has been in immigration detention since December 20, 2025, and remain detained without having received a prompt, individualized hearing at which the government bears the burden of justifying continued detention. As the length of detention increases, the constitutional justification for detention diminishes, and due process demands heightened procedural protections.

50. Petitioner's detention to date while not yet extensive is **indefinite in nature** because, under Respondents' position, he will receive no custody hearing for the duration of his case. This lack of any procedure transforms what is supposed to be civil, non-punitive detention into something punitive, in violation of the Fifth Amendment. Petitioner has scrupulously complied with all immigration requirements and court orders. He has no history of absconding or criminal conduct. To the contrary, as alleged above, he has significant positive equities: he has maintained consistent residence, has immediate family ties in the United States (including a U.S. citizen spouse), has a

reliable sponsor, and has pending appeal with BIA. Further, Petitioner was also a victim of Armed Robbery. *Please see Exhibit C*, Copy of Police Report by Columbus Police Department, GA.

51. Despite these factors, Petitioner has never been afforded a meaningful opportunity to contest his detention. He has not received an individualized determination by any court or judge assessing whether he actually poses a flight risk or danger to the community, nor has the Government been required to justify his detention by clear and convincing evidence (or indeed by any standard of proof). This complete absence of procedural safeguards violates fundamental principles of due process. Even if immigration detention is civil, not criminal, the Constitution requires some process to ensure detention is not erroneous or unnecessary.

52. Moreover, there is no evidence that Petitioner poses any danger to the community – he has no criminal record, and nothing in his conduct suggests a threat to public safety. Absent such a showing, detention cannot be justified under the guise of preventing danger. Likewise, given Petitioner’s deep ties and compliance record, there is no evidence that he would abscond if released. By automatically keeping Petitioner detained without a hearing, Respondents have effectively presumed him to be a flight risk or danger without giving him any chance to rebut that presumption, contrary to due process.

53. Balancing the interests – Petitioner’s powerful interest in liberty, the high risk of an erroneous deprivation of that liberty under the no-hearing policy, and the Government’s interests – it is clear that additional procedures (at least a bond hearing) are required by due process. The Government’s interest in preventing flight or danger can be addressed through individualized bond proceedings and conditions of release; it does not justify a blanket denial of hearings. Thus, Respondents’ failure to provide Petitioner with any mechanism to challenge his prolonged detention violates Petitioner’s procedural due process rights under the Fifth Amendment.

54. Accordingly, Petitioner's continued detention since December 20, 2025 without a timely and meaningful opportunity to challenge its necessity constitutes a violation of procedural due process. Habeas relief is warranted to remedy this ongoing constitutional injury. Petitioner respectfully requests that the Court order Respondents to provide him an immediate individualized bond hearing with the proper burden on the Government, or, alternatively, order Petitioner's release forthwith under appropriate conditions of supervision.

COUNT THREE: EXHAUSTION OF ADMINISTRATIVE REMEDIES

55. This Court has jurisdiction to review habeas petitions filed by immigration detainees who assert that they are "in custody in violation of the Constitution or laws or treaties of the United States." 28 U.S.C. § 2241(c)(3). Since exhaustion, as the government recognizes, is not required by statute in this context, its exhaustion argument is measured against the "more permissive" common-law, rather than statutory, exhaustion standard, which "cedes discretion to a [federal] court to decline the exercise of jurisdiction." *Brito v. Garland*, 22 F.4th 240, 255-56 (1st Cir. 2021) (quoting *Anversa v. Partners Healthcare Sys., Inc.*, 835 F.3d 167, 174 (1st Cir. 2016)); see ECF 7, at 6. While the exhaustion doctrine often "serves the twin purposes of protecting administrative agency authority and promoting judicial efficiency," there are "circumstances in which the interests of the individual weigh heavily against requiring administrative exhaustion." *Portela-Gonzalez v. Sec'y of the Navy*, 109 F.3d 74, 77 (1st Cir. 1997) (quoting *McCarthy v. Madigan*, 503 U.S. 140, 145-46 (1992)). As relevant here, "a court may consider relaxing the [exhaustion requirement] when unreasonable or indefinite delay threatens unduly to prejudice the subsequent bringing of a judicial action." *Id.* "And, relatedly, if the situation is such that 'a particular plaintiff may suffer irreparable harm if unable to secure immediate judicial consideration of his claim,' exhaustion may be excused even though 'the

administrative decision-making schedule is otherwise reasonable and definite.” *Id.* (quoting *McCarthy*, 503 U.S. at 147). Irreparable harm may be established where a petitioner will be incarcerated or detained pending the exhaustion of administrative remedies. *See Brito*, 22 F.4th at 256 (“[E]xhaustion might not be required if [the petitioner] were challenging her incarceration . . . or the ongoing deprivation of some other liberty interest.” (quoting *Bois v. Marsh*, 801 F.2d 462, 468 (D.C. Cir. 1986))).

56. As a general matter, a habeas petitioner must exhaust available administrative remedies before seeking relief in federal court. However, exhaustion is not jurisdictional in immigration habeas proceedings and is not required where administrative remedies are unavailable, inadequate, futile, or incapable of providing the relief sought.

57. In this case, no adequate administrative remedies are available to address Petitioner’s claim that his detention is unlawful. There is no administrative process that would promptly afford Petitioner a bond hearing or equivalent relief. The immigration judge lacks jurisdiction to provide a custody redetermination. ICE’s own discretionary custody review processes do not provide the kind of hearing and burden of proof that due process requires. In short, there is no administrative mechanism by which Petitioner can obtain the relief he seeks – an individualized determination of his right to release. Further pursuit of any internal review or appeal within ICE would therefore be futile and incapable of providing the relief sought.

58. Moreover, the Final Judgment in *Maldonado Bautista* (discussed above) confirms futility. The agency (through the Executive Office for Immigration Review) has been found to be intransigent in adhering to the now-invalidated *Yajure-Hurtado* policy. Requiring Petitioner to ask the agency for a bond hearing that it insists it cannot give and which a federal court has already

ordered must be provided would be an exercise in futility. The agency has effectively predetermined the issue against Petitioner, leaving no meaningful administrative path.

59. Petitioner has exhausted any and all potentially available administrative remedies to the extent they exist. He has complied with all immigration procedures: he appeared for all required check-ins and hearings, filed the appropriate applications for relief. There are no further steps he could take within the immigration system to secure his release. In the meantime, he remains in custody, suffering irreparable harm each day his freedom is unlawfully restrained.

60. Finally, Petitioner's equities strongly support excusing any exhaustion requirement. He has no criminal record and no history of flight. He has significant ties to the United States and other family and community connections, and he has demonstrated unwavering compliance with all legal obligations. Forcing Petitioner to remain detained while awaiting some hypothetical administrative remedy (which in reality is unavailable) would unjustly prejudice him and defeat the purpose of habeas relief.

61. For these reasons, the Court should hold that Petitioner has satisfied any exhaustion requirement, or that exhaustion is excused as futile, inadequate, and/or causing irreparable harm in this context. Accordingly, this Court may properly exercise jurisdiction over Petitioner's habeas claims now, and grant relief on the merits.

X. PRAYER FOR RELIEF

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

1. Assume Jurisdiction over this matter;
2. Grant Petitioner a writ of habeas corpus directing Respondents to immediately release Petitioner from custody;

3. Enter preliminary and permanent injunctive relief enjoining Respondents from further unlawful detention of Petitioner while his appeal is pending with BIA;

4. Grant any other and further relief that this Court deems just and proper.

I affirm, under penalty of perjury, that the foregoing is true and correct.

Respectfully submitted on March 06, 2026.

/s/ Bhavya Chaudhary

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CERTIFICATE OF SERVICE

I, Bhavya Chaudhary Esq. hereby certify that a copy of the foregoing was mailed First class postage prepaid to the office of the Attorney General at the below mentioned address:

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