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7  
8 **UNITED STATES DISTRICT COURT**  
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 **In the Matter of** )  
11 )  
12 **DEEPENDRA BAHADUR CHHETRI** )  
13  )  
14 **Petitioner** )

**Case No.: 3:26-cv-1589-CAB-DEB**

**FIRST AMENDED PETITION  
FOR WRIT OF HABEAS  
CORPUS**

**ORAL ARGUMENT  
REQUESTED**

**EXPEDITED HEARING  
REQUESTED**

15  
16 **Warden of Imperial Regional Detention Facility** )  
17 **Kristi Noem, Secretary of the U.S. Department** )  
18 **of Homeland Security** )  
19 **Pamela Bondi, Attorney General of the United** )  
20 **States** )  
21 **U.S Immigration Customs Enforcement** )  
22 **U.S. Department of Homeland Security** )  
23 **In their official capacities** )  
24 **Respondents** )

25 **FIRST AMENDED PETITION FOR WRIT OF HABEAS CORPUS**



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**Introduction**

1. Petitioner respectfully petitions this Court for a Writ of Habeas Corpus pursuant to 28 U.S.C. § 2241 to challenge the legality of his continued detention by Respondents in Calexico, California.
2. Petitioner entered the United States on or about December 27, 2024, at or near Calexico, California, without inspection. He was immediately encountered by immigration authorities and expressed a fear of return to Nepal.
3. Petitioner was processed by immigration authorities following his entry and was placed into removal proceedings. He has remained in immigration custody since his apprehension on December 27, 2024.
4. Petitioner has now been detained for approximately 15 months without a final order of removal.
5. Petitioner has no criminal history and poses neither a danger to the community nor a flight risk.
6. Respondents have unlawfully denied Petitioner a constitutionally adequate opportunity to seek release from detention.
7. As a result of the Immigration Court’s jurisdictional ruling, Petitioner has no available administrative mechanism to obtain release from detention, rendering continued detention effectively indefinite and without meaningful review.
8. Petitioner seeks immediate release.
9. Petitioner applied for asylum before United States Immigration authorities. Respondents commenced removal proceedings against Petitioner in Immigration court, entitling Petitioner to present an asylum claim with the due process rights under 8 U.S.C. § 1229a. Yet, Respondents now seek to eject Petitioner from Petitioner’s own asylum case and to



1 detain petitioner so that they can rapidly deport Petitioner under an entirely separate law.  
2 Respondents' interpretation effectively denies Petitioner the procedural protections  
3 guaranteed by the Fifth Amendment and is inconsistent with settled constitutional law.

4 10. The U.S. Constitution requires Respondents to provide Petitioner with the rights available  
5 to Petitioner when Petitioner filed an application for asylum.

6 11. This Court should grant this petition for a Writ of Habeas Corpus. Petitioner asks that this  
7 Court find that Respondents' attempts to continuously detain Petitioner are a violation of  
8 due process.  
9

10 **JURISDICTION**

11 12. Petitioner is in the physical custody of Respondents and is detained at the Imperial  
12 Regional Detention Facility in Calexico, CA.

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

15 14. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28  
16 U.S.C § 1331 (federal question), and Article 1, § 9 cl 2. Of the United States Constitution  
17 (Suspension Clause).  
18

19 15. This Court may grant relief under the habeas corpus statutes, 28 U.S.C § 2241, the  
20 Declaratory Judgment Act, 28 U.S.C § 2201 *et. seq.*, the All Writs Act, 28 U.S.C § 1651,  
21 and the Immigration and Nationality Act, 8 U.S.C § 1252(e)(2).  
22

23 16. The Petitioner is presently in custody under color of authority of the United States and  
24 such custody is in violation of the U.S. Constitution, laws, or treaties of the United States.

25 17. Nothing in the INA deprives this Court of jurisdiction, including 8 U.S.C. § 1252(b)(9),  
26 (f)(1), or 1226(e). Congress has preserved judicial review of challenges to prolonged  
27 immigration detention. *See Jennings v Rodriguez*, 138 S. Ct. 830, 839-41 (2018).  
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**VENUE**

18. Pursuant to *Braden v 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 493-500 (1973), venue lies in the United States District Court for the Southern District of California, the judicial district in which the Petitioner is detained.

19. Venue is also properly vested in this Court pursuant to 28 U.S.C. § 1391(e) because Respondents are employees, officers, and agencies in the United States, and because a substantial part of the events or omissions giving rise to the claims occurred in the Southern District of California.

**CUSTODY**

20. Petitioner is in the physical custody of the Department of Homeland and the U.S. Immigration and Customs Enforcement (ICE). At the time of this petition, Petitioner is detained at the Imperial Regional Detention Facility State Annex facility in Calexico, California. Petitioner is under the direct control of Respondents and their agents.

**REQUIREMENTS OF 28 U.S.C 2243**

21. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the Respondent's "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.*



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22. The habeas statute has long been recognized by Courts for its significance in protecting individuals from unlawful detention in the U.S. 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 to all cases of illegal restraint or confinement.” *Fay v. Noia*, 372 U.S. 391, 400 (1963).

**PARTIES**

23. Petitioner is a 37-year-old citizen of Nepal. Petitioner is present within the state of California as of the time of the filing of this petition. Petitioner has been in custody of the Department of Homeland Security (DHS) since December 27 of 2024. Since that time, Petitioner has sought relief from removal in Immigration Court.

24. Respondent Warden of the Imperial Regional Detention Facility has immediate physical custody of Petitioner pursuant to the facility’s agreement with U.S. Immigration and Customs Enforcement to detain noncitizens and is a legal custodian of Petitioner. Respondent is a legal custodian of Petitioner.

25. 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.

26. 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.



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

4 28. Respondent U.S. Department of Homeland Security (DHS) is the federal agency  
5 responsible for implementing and enforcing the INA, including the detention of  
6 noncitizens.

7 29. This action is commenced against all Respondents in their official capacities.  
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10 **LEGAL FRAMEWORK**

11 30. The Due Process Clause of the Fifth Amendment provides Petitioner with important  
12 protections regarding his detention. As the Supreme Court has explained, “[f]reedom from  
13 imprisonment- from government custody, detention, or other forms of physical restraint-  
14 lies at the heart of the liberty” that the Due Process Clause protects. *Zadvydas v. Davis*,  
15 533 U.S. 678, 690 (2001).  
16

17 31. Since the Supreme Court’s *Jennings v Rodriguez*, 138 S. Ct. 830 (2018) decision, the  
18 Ninth Circuit has expressed “grave doubt” that “any statute that allows for arbitrary  
19 prolonged detention without any process is constitutional or that those who founded our  
20 democracy precisely to protect against the government’s arbitrary deprivation of liberty  
21 would have thought so.” *Rodriguez v Marin*, 909 F.3d 252, 256 (9th Cir. 2018).  
22

23 32. To guarantee against such arbitrary detention and to guarantee the right to liberty, due  
24 process requires “adequate procedural protection” that ensure the government’s asserted  
25 justification for a noncitizen’s physical confinement “outweighs the individual’s  
26 constitutionally protected interest in avoiding physical restraint.” *Zadvydas*, 533 U.S. at  
27 690.  
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1 33. In the immigration context, the Supreme Court has recognized only two valid purposes for  
2 civil detention; to mitigate the risks of danger to the community and to prevent flight. The  
3 government may not detain a noncitizen based on any other justification.

4 34. To justify immigration detention, the government must bear the burden of proof by clear  
5 and convincing evidence that the noncitizen is a danger or flight risk. See *Singh v Holder*,  
6 638 F.3d 1196, 1203 (9<sup>th</sup> Cir. 2011).

7 35. The requirement that the government bear the burden of proof by clear and convincing  
8 evidence is also supported by application of the three-factor balancing test from *Mathews*  
9 *v Eldridge*, 424 U.S. 319, 335 (1976).

10 36. First, incarceration deprives noncitizens of a profound liberty interest – one that always  
11 requires some form of procedural protections *Diouf*, 634 F.3d at 1091-92.

12 37. Second, the risk of error is great where the government is represented by trained attorneys  
13 and noncitizens are often unrepresented and frankly lack English proficiency. See  
14 *Santosky v. Kramer*, 455 U.S. 745, 762-63 (1982). Moreover, Respondents detain  
15 noncitizens in prison-like conditions that severely hamper their ability to obtain legal  
16 assistance, gather evidence, and prepare for a bond hearing.

17 38. Third, placing the burden on the government imposes minimal cost or inconvenience, as  
18 the government has access to the noncitizen's immigration records and other information  
19 that it can use to make its case for continued detention.

20 39. Here, the Respondents can neither show that the continued detention of the Petitioner is  
21 reasonably related to the original purpose and the Mathews tests are satisfied. Similarly,  
22 no procedural safeguards are offered to those who remain in custody.

23 40. Under the three-part test of Mathews, 424 U.S., the balance overwhelmingly favors  
24 Petitioner. His interest in liberty is paramount.  
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- 1 41. Immigration detention is a form of civil confinement that “constitutes a significant  
2 deprivation of liberty that requires due process protection.” *Addington v Texas*, 441 U.S.  
3 418, 4253 (1979).
- 4 42. The Refugee Act of 1980 establishes the statutory right to apply for asylum and reflects  
5 Congress’s intent that individuals feeling persecution be afforded meaningful procedural  
6 protections while their claims are adjudicated, including protection from arbitrary  
7 detention that would undermine access to asylum adjudication. Refugee Act of 1980, §  
8 101(a), Pub. L. No. 96-212, 94 Stat 102 (1980).
- 9 43. Refugee Act reflects a legislative purpose “to give ‘statutory meaning to our national  
10 commitment to human rights and humanitarian concerns.’” *Duran v. INS*, 756 F.2d 1338,  
11 1340 n.2 (9<sup>th</sup> Cir. 1985).
- 12 44. The Refugee Act established the right to apply for asylum in the United States and defines  
13 the standards for granting asylum. It is codified in the INA.
- 14 45. The INA gives the Attorney General or the Secretary of Homeland Security discretion to  
15 grant asylum to noncitizens who satisfy the definition of “refugee.” Under this definition,  
16 individuals are generally eligible for asylum if they have experienced past persecution or  
17 have a well-founded fear of future persecution on account of race, religion, nationality,  
18 membership in a particular social group, or political opinion and if they are unable or  
19 unwilling to return to and avail themselves of the protection of their homeland because of  
20 that persecution of fear. 8 U.S.C. § 1101(a)(42)(A).
- 21 46. A grant of asylum may be discretionary, but the right to apply for asylum is not. The  
22 Refugee Act broadly affords a right to apply for asylum to any noncitizen “who is  
23 physically present in the United States or who arrives in the United States.” 8 U.S.C. §  
24 1158(a)(1).
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1 47. Because of the life-or-death stakes that are often present in asylum matters, the statutory  
2 right to apply for asylum is robust. The right includes the right to counsel, at no expense to  
3 the government, the right to notice, and the right to access information in support of an  
4 application.

5  
6 48. Noncitizens who seek asylum in the U.S. are guaranteed Due Process under the Fifth  
7 Amendment to the U.S. Constitution. *Reno v Flores*, 507 U.S. 292, 306 (1993).

8 49. Noncitizens who are applicants for asylum are entitled to a full hearing in immigration  
9 court before they can be removed from the United States. 8 U.S.C. § 1229a. Noncitizens  
10 may seek administrative appellate review before the Board of Immigration Appeals of  
11 removal orders against them and judicial review in federal court upon a petition for  
12 review. 8 U.S.C § 1252(a) *et seq.*

13  
14 50. Immigration detention is civil, not punitive, and is constitutionally permissible only to  
15 serve a legitimate, nonpunitive purpose, such as preventing flight or protecting the  
16 community. Where due process requires continued detention, the government must justify  
17 it through an individualized determination of flight risk or danger. *Zadvydas v. Davis*, 533  
18 U.S. 678, 690 (2001).

19 51. Immigration detention is civil, not punitive, and must bear a reasonable relationship to its  
20 purported purposes, such as ensuring appearance at proceedings or protecting the  
21 community.

22  
23 52. The Due Process Clause of the Fifth Amendment limits the government's authority to  
24 detain noncitizens without adequate procedural safeguards. Prolonged detention without a  
25 meaningful opportunity for release violates due process, particularly where the individual  
26 has no criminal history or has demonstrated eligibility for relief from removal.

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28 **EXHAUSTION OF ADMINISTRATIVE REMEDIES**

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53. Respondents' continued detention of Petitioner constitutes final agency action that is arbitrary and capricious because it reflects a failure to engage in reasoned decision-making and to consider legally required factors, including Petitioner's lack of criminal history, demonstrated compliance with proceedings, and eligibility for release under § 1226(a)


54. Petitioner has exhausted his administrative remedies to the extent required by law. He has fully cooperated with Respondents and has not delayed or obstructed his detention. Petitioner's only remedy is by way of this judicial action.

55. On June 6, 2025, the Immigration Judge denied Petitioner's request for a custody redetermination hearing, finding that the court lacked jurisdiction to review Petitioner's custody.

56. No further administrative remedy is available that would address the constitutional violations raised in this petition.

**STATEMENT OF FACTS**

57. Petitioner is a citizen and national of Nepal.

58. Petitioner was threatened  in Nepal for his political beliefs. Fearing for his life, he sought protection in the United States.

59. Petitioner entered the United States on or about December 27, 2024, at or near Calexico, California, without inspection, and was immediately apprehended by immigration authorities.

60. Respondents initiated removal proceedings against Petitioner under 8 U.S.C. § 1229a and filed his Notice to Appear.



- 1 61. Petitioner has remained continuously detained since his apprehension on December 27,  
2 2024, and has never been released from immigration custody. He was issued a Notice to  
3 Appear on February 5, 2025, and placed into removal proceedings, where his case remains  
4 pending without a final order of removal.  
5
- 6 62. Respondents alleged that Petitioner was inadmissible to the United States and commanded  
7 that Petitioner appear for a hearing in the immigration court.  
8
- 9 63. Petitioner speaks the Magar Kham language and has experienced significant difficulty  
10 navigating immigration proceedings due to the lack of appropriate interpretation services.  
11 Prior proceedings were continued or delayed due to the unavailability of a Kham  
12 interpreter, impairing Petitioner's ability to meaningfully participate in his case.  
13
- 14 64. Petitioner has appeared for multiple master calendar hearings before the Imperial  
15 Immigration Court, where proceedings were continued. He has not received a final merits  
16 hearing and no final order of removal has been issued.  
17
- 18 65. Despite being detained for over one year, Petitioner has been unable to meaningfully  
19 participate in his removal proceedings due to the repeated unavailability of a Magar Kham  
20 interpreter. Immigration Court records reflect multiple continuances caused by the lack of  
21 appropriate interpretation services, preventing the case from progressing toward  
22 resolution.  
23
- 24 66. Petitioner applied for asylum before United States and Immigration Services.  
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- 26 67. Petitioner has timely and consistently appeared for all hearings in Immigration Court.  
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- 28 68. Petitioner is now detained in the Imperial Regional Detention Facility without an adequate  
justification.

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69. Petitioner sought a custody redetermination hearing before the Immigration Court. On June 6, 2025, the Immigration Judge denied the request, concluding that the court lacked jurisdiction to conduct a bond hearing.

70. Petitioner has no criminal history.

71. Petitioner has no history of being a public threat.

72. Petitioner is not a flight risk and has every incentive to meet all requirements for his asylum matter.

**CLAIMS FOR RELIEF**

**Count One**

**Constitutional Claim: Violation of Fifth Amendment Right to Due Process**

**Procedural Due Process**

73. Petitioner restates and realleges all paragraphs as if fully set forth here.

74. “Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that [the] Clause protects.” *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).

75. Civil immigration detention is only permissible where it bears a “reasonable relation to the purpose for which the individual was committed.” *Jackson v. Indiana*, 406 U.S. 715, 738 (1972). Those purposes are limited: preventing flight and protecting the community. *Demore v. Kim*, 538 U.S. 510, 528 (2003)

76. In the Ninth Circuit, prolonged immigration detention without a constitutionally adequate bond hearing violates due process. See *Singh v. Holder*, 638 F.3d 116, 1203-05 (9<sup>th</sup> Cir. 2011) (requiring bond hearings with procedural protections); *Aleman Gonzalez v. Barr*, 955 F.3d 762, 770 (9<sup>th</sup> Cir. 2020) (recognizing constitutional limitation on prolonged



1 detention). Where detention becomes prolonged, due process requires the Government to  
2 justify continued custody at an individualized hearing before a neutral decisionmaker.

3 77. Petitioner has been detained without a constitutionally adequate individualized custody  
4 determination despite having no criminal history and maintaining strong community ties.  
5 Petitioners' detention violates his right to substantive and procedural due process  
6 guaranteed by the Fifth Amendment to the U.S. Constitution.  
7

8 78. The Due Process Clause of the Fifth Amendment to the U.S. Constitution prohibits the  
9 federal government from depriving any person of "life, liberty, or property, without due  
10 process of law." U.S. Const. Amend. V. Due process protects "all 'persons' within the  
11 United States, including [non-citizens], whether their presence here is lawful, unlawful,  
12 temporary, or permanent." *Zadvydas*, 533 U.S. at 693.  
13

14 79. Due process requires that government action be rational and non-arbitrary. *See U.S. v.*  
15 *Trimble*, 487 F.3d 752, 757 (9<sup>th</sup> Cir. 2007).

16 80. Petitioner has not received any individualized custody determination before a neutral  
17 decisionmaker. The Immigration Judge refused to conduct a bond hearing, finding a lack  
18 of jurisdiction. As a result, Petitioner has been detained without any meaningful  
19 opportunity to seek release.  
20

21 81. The absence of any bond hearing violates due process, which requires that prolonged civil  
22 detention be accompanied by an individualized determination where the government bears  
23 the burden of justifying continued detention by clear and convincing evidence.

24 82. Petitioner's detention has now exceeded one year without any individualized custody  
25 determination or meaningful progress in his removal proceedings.  
26

27 **Count Two**

28 **Violation of the Immigration and Nationality Act Detention After Removal Proceedings**

1 83. Petitioner herein incorporates all allegations and facts set forth in the paragraphs above.

2 84. Petitioner's continued detention violates the Immigration and Nationality Act.

3 85. The INA does not authorize indefinite or unreasonably prolonged detention.

4 86 Respondents' continued detention of Petitioner violates the Immigration and Nationality  
5 Act ("INA) because Petitioner, who has a pending asylum application and was  
6 apprehended within the interior of the United States, is detained pursuant to 8 U.S.C. §  
7 1226(a), which authorizes discretionary detention and contemplates individualized  
8 custody determinations. The Immigration Judges jurisdictional ruling does not convert  
9 Petitioner's detention into mandatory detention for constitutional purposes, nor does it  
10 eliminate the Government's obligation to provide a constitutionally adequate custody  
11 hearing.  
12

13  
14 87. Despite Petitioner's detention since December of 2024, Respondents have failed to  
15 provide a constitutionally adequate bond hearing or otherwise justify continued detention  
16 under the INA.

17 88. Although Petitioner is not subject to a final order of removal, courts have long recognized  
18 that prolonged immigration detention raises serious constitutional concerns. In *Zadvydas*  
19 *v. Davis*, the Supreme Court established that detention beyond six months becomes  
20 presumptively unreasonable in the post-removal context. While that framework does not  
21 directly govern this case, it provides a useful benchmark demonstrating that Petitioner's  
22 detention—now exceeding one year without any meaningful custody review—is  
23 constitutionally excessive and requires immediate judicial intervention.  
24

25 89. Courts in this Circuit have likewise recognized that prolonged detention without adequate  
26 procedural safeguards raises serious due process concerns, particularly where, as here, the  
27 government has failed to provide any individualized custody determination and has  
28



1 delayed proceedings through the repeated unavailability of necessary interpretation  
2 services.

3 90. The mandatory detention provision of 8 U.S.C § 1225(b)(2) does not apply to noncitizens  
4 residing in the United States who entered without inspection and were not placed in  
5 expedited removal, and Petitioner is not subject to any other mandatory detention statute,  
6 including §1225(b)(1), 1226(c), or 1231.

7  
8 91. By detaining Petitioner for an unreasonably prolonged period without a meaningful  
9 opportunity to seek release on bond or parole, Respondents have exceeded their statutory  
10 authority under the INA and are unlawfully restraining Petitioner's liberty.

11  
12 **Count Three**

13 **Violation of the Administrative Procedure Act**

14  
15 92. Under the Administrative Procedure Act, a court shall "hold unlawful and set aside  
16 agency action" that is an abuse of discretion. 5 U.S.C. 706(2)(A).

17 93. An action is an abuse of discretion if the agency entirely failed to consider an important  
18 aspect of the problem, offers an explanation for its decision that runs counter to the  
19 evidence before the agency, or is so implausible that it could not be ascribed to a different  
20 in view or the product of agency expertise. *Nat'l Ass'n of Home Builders v Defs Or*  
21 *Wildlife*, 551 U.S. 644, 658 (2007).

22  
23 94. To survive an APA challenge, the agency must articulate a satisfactory explanation for its  
24 action, including a rational connection between the facts found and the choice made.  
25 *Dep't of Com V. New York*, 139 S. Ct. 2551, 2569 (2019).

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27 95. On information and belief, Respondents have made no substantiated finding that  
28 Petitioner is a danger to the community.

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96. On information and belief, Respondents have made no substantiated finding that the Petitioner is a flight risk, in fact, the Petitioner has never failed to appear for immigration proceedings.
97. By detaining the Petitioner, the Respondents have abused their discretion.

**PRAYER FOR RELIEF**

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

1. Assume jurisdiction over this matter;
2. Issue an Order to Show Cause ordering Respondents to show cause why this Petition should not be granted within three (3) days;
3. Declare that Petitioner’s detention without an individualized determination violates the Due Process Clause of the Fifth Amendment;
4. Issue a Writ of Habeas Corpus ordering the Respondents to release Petitioner from custody; hold a hearing if warranted, determine that Petitioners’ detention is not justified because the government has not established by clear and convincing evidence that Petitioner presents a risk of flight or a danger to the community in light of the available alternatives;
5. Issue an Order prohibiting the Respondents from transferring Petitioner from the district without the court’s approval;
6. Declare that Petitioner’s continued detention is unconstitutional and unlawful because it is not reasonably related to any legitimate purpose of immigration detention;
7. In the alternative, should the Court determine that immediate release is not warranted, order Respondents to provide Petitioner with an individualized bond hearing before an impartial immigration judge within fourteen (14) days, at



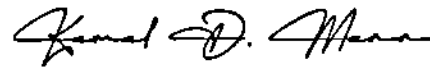
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which the Government bears the burden of proving by clear and convincing evidence that continued detention is justified.

- 8. Declare that Respondents' conduct violates the Administrative Procedure Act, 5 U.S.C. §§ 702 and 706, as arbitrary, capricious, and not in accordance with law;
- 9. In the alternative, should the Court determine that immediate release is not warranted, order Respondents to provide Petitioner an individualized bond hearing before an impartial immigration judge within 14 days, at which the government bears the burden to justify continued detention by clear and convincing evidence;
- 10. Award reasonable attorneys' fees and costs pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412, and any other applicable authority; and
- 11. Grant such other and further relief as the Court deems just and proper.

Respectfully Submitted,

Dated this 31<sup>th</sup> day of March 2026.



s/ Kamal D. Mann

Kamal D. Mann

THE MANN LAW OFFICES, P.C.

*Attorney for Petitioner*

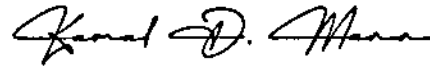
**VERIFICATION PURSUANT TO 28 U.S.C 2242**

I am submitting this verification on behalf of the Petitioner because I am the attorney for Petitioner. I or my co-counsel have discussed with the Petitioner the events described in this Petition. Based on those discussions, I hereby verify that the statements made in the attached Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.



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Dated this 31<sup>th</sup> day of March 2026.



s/ Kamal D Mann

Kamal D. Mann

THE MANN LAW OFFICES, P.C.

*Attorney for Petitioner*

