



2. Are you currently being held on orders by:

Federal authorities     State authorities     Other - explain:

DHS 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:

(a) Name and location of the court or agency: Imperial Immigration Court  
2409 LA Brucherie Rd Imperial, CA 92251

(b) Case number, docket number or opinion number (if you know): \_\_\_\_\_

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(d) Date of the decision or action: 01/08/2025 (The day I was arrested & Detained)

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: \_\_\_\_\_

(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: I have sent a letter to the warden and my TCE officer and there was no response to my letter

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 6 was "No," explain why you did not appeal: I have sent a letter to the warden and my TCE officer and there was no response to my letter. Any appeal would be futile

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: I have sent a letter to the Warden and my ICE officer but there was no response to my letter, any further appeal would be futile

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 detain for over six months. One year and two months to be precise.

(a) Supporting FACTS (state *briefly* without citing cases or law) \_\_\_\_\_  
The approach adopted by the United States Court of Appeals for the nine Circuit is to Apply a bright line-rule to Cases of Mandatory detention on where the Government Statutory Detention Authority is limited to a six month period, subject to finding of flight risk or dangerousness of to Community

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

Yes  No

GROUND TWO: I am not flight risk or danger to the  
Community

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

I have a sponsor who will ensure that I will attend  
all my Immigration Court hearing and he is a  
lawfully abiding citizen of United States who  
gainfully employed and he is willing to accommodate  
me and take care of my basic needs throughout  
all my Immigration Court proceedings.

I came with my passport, it is with ICE custody  
I promise to go to court or come to any ICE interviews  
when ever they need me.

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

Yes  No

GROUND THREE: I am entitled to due process under the fifth amendment of the United States Constitution

(a) Supporting FACTS (state *briefly* without citing cases or law): It is well-settled that the fifth amendment entitles aliens to due process in deportation proceedings. The process clause applies to all persons within the United States, including aliens whether their presence here is lawful, unlawful temporary or permanent, more than a decade ago. In the Zadyvar decision the United States Supreme Court signalled its concerns about the constitutionality of a statutory scheme that ostensibly authorized indefinite detention of non-citizens. Two years later, when the Court upheld the constitutionality of 8.4.S.C.S<sup>5</sup> 1226(c) in the demore decision it emphasized that for detention under the statute to be reasonable it must be for a brief period of time. Justice Kennedy explained in his concurrence in the demore decision that were there to be an unreasonable delay by the Immigration and Naturalization Service in pursuing and completing deportation proceedings it could be come necessary then to inquire whether the detention is not to facilitate deportation or to protect against risk of flight or dangerousness but to incarcerate for other reasons

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

Yes  No

GROUND FOUR: The is no Significant likelihood of removal  
in the near future

(a) Supporting FACTS (state briefly without citing cases or law): The duration  
of my current detention has been Unreasonably prolonged  
and there is reason to anticipate Significant future  
detention during my immigration proceedings.  
Even if I receive an adverse decision from the  
Immigration Judge I will appeal to the B.I.A which  
can take months to litigate my appeal. Even if the  
B.I.A Denies my appeal I have the right to appeal to  
the 9<sup>th</sup> Circuit which can take typically one year or  
two years. Conditions of my Confinement. The  
Condition of Confinements have been affecting me  
psychologically and physically. We have been restricted  
from outdoor space, forbidden to access the internet and  
therefore are Unable to connect with loved ones and  
restricted on Visitation.

(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 N/A

(b) On appeal from any adverse ruling in a post-conviction proceeding N/A

Wherefore, petitioner prays that the Court grant petitioner relief to which he may be entitled in this proceeding Specifically I request from this Court to grant me release or alternatively a bond hearing in front of the Immigration Judge.

\_\_\_\_\_  
SIGNATURE OF ATTORNEY (IF ANY)

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

03/17/2026

(DATE)

[Signature]

SIGNATURE OF PETITIONER

**INSTRUCTIONS FOR FILING**  
**PETITION UNDER 28 U.S.C. § 2241 FOR WRIT OF HABEAS CORPUS**  
**IN THE UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF CALIFORNIA**

- (1) This petition must be legibly handwritten or typewritten. You must tell the truth in the petition and you must sign the petition under penalty of perjury. If you do not tell the truth in this petition, you may be prosecuted for and convicted of perjury.
- (2) Answer all the questions on the form as concisely as you can. You do not need to cite cases. Include the facts supporting your ground for relief. If briefs or arguments are submitted, they should be submitted as a separate memorandum.
- (3) You must pay a **\$5.00 filing fee** to have your petition filed. The \$5.00 fee must be submitted with the petition, not separately. If you do not have the \$5.00 for the filing fee and any other costs, you may request permission to proceed in forma pauperis. To do so, fill out and submit the "Motion to Proceed in Forma Pauperis" form provided by the Court with your petition. You also **MUST** have an authorized officer at the penal institution complete the "Prison Certificate" statements stating the amount of money and securities on deposit to your credit in any account in the institution.
- (4) You may only challenge a judgment entered by one court in a single petition. If you want to challenge judgments entered by different courts either in the same state or in different states, you must file separate petitions as to each court.
- (5) You must include all grounds for relief and all facts supporting such grounds for relief in the petition you file seeking relief from any judgment of conviction.
- (6) When the petition is fully completed, the original and at least one copy must be mailed to:

Clerk of U.S. District Court  
Southern District of California  
333 W. Broadway, Suite 420  
San Diego CA 92101

- (7) Petitions that do not conform to these instructions will be returned with a notation as to the deficiency.

Hussein, Awel



1572 Gateway Rd

Calexico, California 92231

Deportation Officer Palacios

1564 Gateway Rd

Calexico, California 92231

Re: Request for Release from Detention

Dear Sir,

I am writing to request that you grant my release from detention here in IRDF facility in Calexico California. I was arrested on 01/08/2025 after crossing the border and since then I have been subsequently detain over a year now.

I am not a flight risk nor am I a danger to the community. I also have a sponsor who is a United States citizen, a tax payer who is gainfully employed and willing to accommodate and take care of my basic need throughout my immigration proceedings.

I am Requesting release on bond or parole pending the resolution of my case.

Respectfully Submitted,

Hussein, Awel

02/17/2026

A handwritten signature in black ink, appearing to read 'Hussein Awel'.

Hussein, Awel



1572 Gateway Rd

Calexico, California 92231

Warden Jeremy Casey

1572 Gateway Rd

Calexico, California 92231

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02/17/2026

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