

Raphael Flancy
NAME
A244214369
PRISON NUMBER

Imperial Regional Detention facility
PLACE OF CONFINEMENT

1572 Gateway Rd Calexico, CA 92231
ADDRESS

FILED
MAR 27 2026
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY UIN DEPUTY

United States District Court
Southern District Of California

Raphael Flancy
(FULL NAME OF PETITIONER)
Petitioner

Civil No. '26CV2003 RSH DDL
(TO BE FILLED IN BY CLERK OF U.S. DISTRICT COURT)

v.

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

PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

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

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:

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: 2409 La Brucherie Rd. Imperial CA 92251, Imperial Immigration Court.
- (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): Immigration and Custom Enforcement's decision to detain me despite the fact that I came with bond and paroled and have lived in America for two years.
- (d) Date of the decision or action: 09/30/2025

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: no appeal available.
Any appeal will be futile.

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: no appeal available. every other appeal will 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'm detained under 1226 (a) not 1225 (b) because I was not arrived or seeking admision when i was arrested by ice since I'm not recent entrant

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

I come To U.S.A 10/08/2023 with C.B.P. one and parole by immigration and custom enforcement that same day. work authorisation and also I never failed court. I'm from Haiti and I have Temporary protected status (T.P.S) I have never failed to go to my court date Around 09/29/2025, I was arrested by the immigration and custom enforcement (ICE) and the next day I was brought to imperial Regional detention facility and since then, I have been detained. I'm law abiding and have any criminal record.

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

Yes No

GROUND TWO: MY continued detention without a bond hearing
violates the Immigration and Nationality Act and the
fifth Amendment of the Constitution.

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

The fifth Amendment Clause covers all aliens within
the USA whether their presence here is lawful, unlawful,
temporary or permanent. I am entitled to due process
since I came to USA with a CBone and been paroled
and I'm not a recent entrant, I am also not arriving
or seeking admission. I have lived and work in America
for two years. I resided in

[REDACTED] I worked in doordash before I was
detained. I don't have any Criminal Record and I have
never violated any American Immigration Laws. I was
arrested alongside my wife who is also still been detained
here in Imperial Regional detention facility. Immigration and
Custom Enforcement violated my right by arresting me
and also detaining me despite the fact that I was
Paroled when I came to America.

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. *I am humbly pleading to this Court to order my removal from detention.*

SIGNATURE OF ATTORNEY (IF ANY)

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

03/24/2026
(DATE)



SIGNATURE OF PETITIONER