

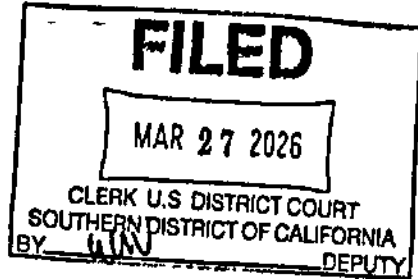
Issaka Nii Doodo Abubakar Sadiick

NAME

[REDACTED]  
PRISON NUMBER

Imperial Regional Detention Facility  
PLACE OF CONFINEMENT

1572 Gateway Rd Calexico CA 92231  
ADDRESS



United States District Court  
Southern District Of California

Issaka Nii Doodo Abubakar Sadiick  
(FULL NAME OF PETITIONER)

Petitioner

v.

Warden 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. '26CV1984 BAS VET

(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:  
By DHS (Department of Homeland Security)

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 Road 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):  
Release by conditional parole or bond

(d) Date of the decision or action: \_\_\_\_\_

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: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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: Violation of the Due Process Clause of the Fifth Amendment to the U.S. Constitution Procedural Due Process

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

The Due Process Clause of the Fifth Amendment forbids the government from depriving any "person" of liberty "without due process of law." U.S. Const. V. Petitioner has a vested liberty interest in his release from immigration custody. Due Process does not permit the government to strip him of the liberty without a hearing before a neutral adjudicator.  
See Morrissey, 408 U.S. at 487-488

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

Yes  No

GROUND TWO: Violation of 8 USC § 1226(a). Unlawful Denial of Bond Hearing

(a) Supporting FACTS (state briefly without citing cases or law): Petitioner is alleged as having entered the U.S. without inspection. 8 U.S.C. § 1182(a)(6)(A)(i). Petitioner is denied release by the Department of Homeland Security and would seek a bond hearing before an immigration judge. However, such a request is futile because the immigration judge will hold that he/she lacks jurisdiction over the hearing based on new EOIR policy that all persons who entered without inspection are deemed applicants for admission to the United States and are ineligible for bond hearing based on the immigration statute, 8 U.S.C. § 1225(b)(2)(A). Section 1225(b)(2)(A) states that an applicant for admission seeking admission shall be detained for a removal proceeding. It is the position of the EOIR, which houses both the BIA and immigration judges, that 8 U.S.C. § 1225(b)(2)(A) applies to all individuals who arrived in the United States without documents, regardless of how far they were apprehended from the border. However, § 1225(b)(2)(A) does not apply to non-citizens, like myself, the Petitioner, who is in the United States who are subject to the grounds of inadmissibility because they previously entered the country without being admitted or paroled. Instead, such non-citizens are subject to detention under a different statute, § 1226(a), and eligible for release on bond. Nevertheless, on July 8, 2025, ICE "in coordination with" DOJ, announced a new policy that reject well-established understanding of the statutory framework and reversed decades of practice. As such, I, the Petitioner, seek an order of declaratory and injunctive relief and set aside relief under the Administrative Procedure Act that I require a bond hearing before the immigration judge.

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

Yes  No

GROUND THREE: There is no significant likelihood of my 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 a reason to anticipate significant future detention during my immigration proceedings.

On July 31, 2025, the immigration Judge granted me with holding of removal. I filed an appeal to this decision on August 26, 2025, and on November 7, 2025, I filed a brief to the B.I.A. On March 6, 2026, I was back to court because the B.I.A said the video of my final merit on July 31 2025 had a defect. On March 20, 2026, I had my second master hearing and I will be having another final merits on 20 April 2026. Even if the immigration judge denies my asylum, I have the right to appeal to B.I.A or 9th circuit which can typically take 1 to 2 years. To date my total time in detention is now 15 months, if the immigration judge again denies my claim of asylum and still the decision is with holding of removal I will appeal the decision which would still mean prolonge of detention.

I, the Petitioner, seek an order of declaratory and injunctive relief and set aside relief under the Administrative Procedure Act requiring that I am released on conditional parole or be provided a bond hearing before the immigration judge.

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

Yes  No

GROUND FOUR: Violation of the Due Process Clause of the Fifth Amendment -  
to the U.S. Constitution Substantive Due Process

(a) Supporting FACTS (state briefly without citing cases or law): I, Petitioner, re-allege and incorporate by reference the paragraphs above. The Due Process Clause of the fifth Amendment forbids the government from depriving and individuals of their right to be free from unjustified deprivations of liberty without it being tethered U.S. Const. amend. V. Due Process does not permit the government to strip petitioner of liberty without it being tethered to one of the two constitutional bases for civil immigration detention: to mitigate against the risk of flight or to protect the community from danger. Civil detention that is unrelated to a civil detention that is unrelated to a valid regulatory purpose or excessive in relation to that purpose is punitive, in violation of substantive due process. See Jones, 393 F.3d at 934.

Additionally, has never committed any crime anywhere in the world and that he has a community tie as he has siblings and many other people from his community. He poses no danger to the community. The government's arrest of Petitioner is untethered from any valid basis of civil immigration detention, is excessive in relation to any risk that does exist, is a clear danger to his health due to his preexisting health condition and is therefore punitive in violation of substantive due process. Petitioner's continued detention is unlawful and violates due process.

(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

23/03/2026

(DATE)



\_\_\_\_\_  
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.

**UNITED STATES DISTRICT COURT  
FOR THE  
SOUTHERN DISTRICT OF CALIFORNIA**

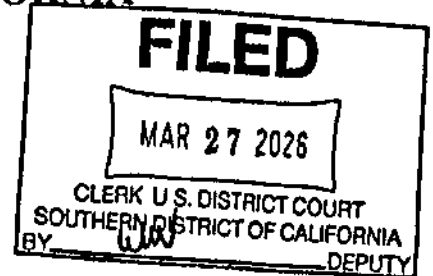
ISSAKA NII DOODO ABUBAKAR

Petitioner

Vs

Warden Jeremy Casey

Respondent



**MOTION FOR APPOINTMENT OF COUNSEL**

Appellant moves for appointment of counsel pursuant to 18 U.S.C §3006 A(a)(2)(B) which allows a court to provide counsel to any financially eligible person seeking relief in court when “the interest of justice so requires”. “In deciding whether to appoint counsel in habeas proceeding, the district court must evaluate the likelihood of success on the merit as well as the ability of the petitioner to articulate his claims pro se in light of the complexity of the legal issue involved. “Weygandt v. look, 718 F.2d 952(9th cir.1983). Petitioner who is not fluent in English, attests that he cannot afford to hire an attorney and does not have the legal education or training to litigate a habeas petition involving immigration laws.

Respectfully Submitted

ISSAKA NII DOODO ABUBAKAR

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**1572 Gateway Rd  
Calexico, California 92231**

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

Please See Attached

- Petition Under 28 U.S.C 2241 For Writ Habeas Corpus in the United States District Court Southern District of California
- Motion for Appoint of counsel

Please could you file these documents in this order with the Court,  
thank you

Respectfully Submitted,

**ISSAKA NII DOODO ABUBAKAR**