

FILED
MAR 30 2026
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY

ABILA ASONGANYI ROMANUS

NAME

PERSON NUMBER

IMPERIAL REGIONAL DETENTION FACILITY

PLACE OF CONFINEMENT

1572 GATEWAY RD CALEXICO CA

ADDRESS

**United States District Court
Southern District Of California**

Abila Asonganyi Romanus

(FULL NAME OF PETITIONER)

Petitioner

v.

Jeremy 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. '26CV2023 TWR JLB

(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:

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: _____

(b) Case number, docket number or opinion number (if you know): ~~XXXXXXXXXX~~
(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed): My prolong detention by Immigration and Customs Enforcement (ICE)

(d) Date of the decision or action: 12/20/2024

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. I requested to be release from detention and the response I got back was that I will remain in custody.

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: Statutory authority reasonable time

(a) Supporting FACTS (state *briefly* without citing cases or law) The time of my detention, over one year and three months has exceeded the period reasonably necessary to carry out removal especially since the BIA appeal is still pending.

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

Yes No

GROUND TWO: I am entitled to Due Process under the fifth Amendment of United States' Constitution

(a) **Supporting FACTS** (state briefly without citing cases or law): It is well settled that the fifth entitled aliens to due process in deportation proceedings. The due process clause applies to all person within the USA including aliens wether their presence here is lawful, unlawful, temporal or permanent. More than a decade ago in the Zadvydas decision. The United states Supreme Court signaled its concerns about the constitutionality of a statutory scheme that ostensibly authorised indefinite detention of non-citizens. Two years later when the court upheld the constitutionality of 8.U.S.C.581226(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 where there is to be unreasonable delay by the immigration and naturalization Service in pursuing and completed deportation proceedings it could become necessary then wether to enquire wether the detention is not to facilitate deportation or to protect against risk of flight or dangerous but to incarcerate for other reasons

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

Yes No

GROUND THREE: I am not a flight risk or danger to the Society

(a) **Supporting FACTS** (state briefly without citing cases or law): I have a sponsor who is a law abiding American citizen. He knows me very well is willing to accommodate and take care of my basic needs throughout my immigration court proceedings. He will also ensure that I attend all my immigration court proceedings and never miss a court date, and I promise never to violate any immigration court rules if being released from custody.

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

Yes No

GROUND FOUR: NO Significant likelihood of removal from detention 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 no reason to anticipate significant future detention during my immigration proceeding. My application was denied and I have appealed to the Board of Immigration and Appeal (BIA) and its still pending. It could take ~~five~~ to six months to be reviewed. Even if I receive an adverse decision from BIA I will appeal to the Ninth Circuit which could continue to delay my removal.

The Conditions of Confinement has also not been favourable, my physical and mental health has be deteriorating. I have excruciating pain on my back and knees that has refused to go.

Movement from one detention to the other in Chain has also traumatised me to the extend that I can't sleep without taking pills.

(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:

None of these grounds were presented to any state or Federal Court. Petitioner is presenting these grounds for the first to this Court.

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 _____

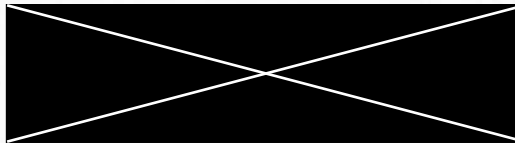
Wherefore, petitioner prays that the Court grant petitioner relief to which he may be entitled in this proceeding.

SIGNATURE OF ATTORNEY (IF ANY)

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

3/18/2026

(DATE)

A black rectangular box with a white 'X' drawn across it from corner to corner, used to redact the signature of the petitioner.

SIGNATURE OF PETITIONER

Abila Asonganyi Romanus

1572 Gateway Rd
Calxico, CA 92231
3/18/2026

The Warden of Imperial Regional
Detention Facility,
Jeremy Casey
1572, Gateway Rd
Calxico, CA 92231

Sir,

REQUEST FOR RELEASE FROM DETENTION

I am requesting that you release me from your facility. I have been in your custody since 12/21/2024 after I was arrested by Border Patrol on 12/20/2024 before being brought to your facility.

I am not a flight risk nor a danger to the community. My sponsor is also a law abiding citizen of the United States who is employed and pays his taxes regular. He is also will to take care of my basic needs until I finish my immigration proceedings.

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

Respectfully Submitted by:
Abila Asonganyi Romanus

Abila Asonqanyi Romanus

~~XXXXXXXXXXXXXXXXXXXX~~
1572 Gateway Rd
Calexico, CA 92231

The deportation officer,
Guardado
1564 Gateway Rd
Calexico, CA 92231

Sir,

REQUEST FOR RELEASE FROM DETENTION

I wish to request that you release me from detention here in imperial Regional Detention facility here in Calexico California. I have been detained since 12/20/2024 when I crossed the border near Calexico.

I am not a flight risk or a danger to the community. My sponsor is a law abiding citizen who pays his taxes and is employed and willing to accomodate me and take care of my basic needs through out my immigration proceedings.

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

Respectfully submitted by:
ABILA ASONQANYI ROMANUS

Done on: 3/18/2026