

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

YE, JIANXIONG

Plaintiff,

v.

**THE WARDEN OF
NORTHWEST ICE PROCESSING CENTER**

Defendants.

Civil Action No. **1:26-CV-2014**

PETITION FOR WRIT OF HABEAS CORPUS
(28 U.S.C. § 2241)

I.

INTRODUCTION

1. Plaintiff, **Ye, Jianxiong**, respectfully petitions this Court for a Writ of Habeas Corpus pursuant to **28 U.S.C. § 2241**, challenging his ongoing and unlawful detention by U.S. Immigration and Customs Enforcement (“ICE”).
2. Plaintiff, Ye, Jianxiong, has been continuously detained by ICE since his entry into the United States. Plaintiff’s family members and legal counsel are located in Flushing, New York, and Plaintiff intends to reside there upon release. For the convenience of the parties and in the interest of justice, venue is proper in the Eastern District of New York pursuant to 28 U.S.C. § 1391(e).
3. Plaintiff is currently detained at **Northwest Detention Center**, located in **Tacoma, WA**.

4. Plaintiff's continued detention violates the **Due Process Clause of the Fifth Amendment** and exceeds the lawful authority granted under the Immigration and Nationality Act.

II.

JURISDICTION

4. This Court has jurisdiction over the present action pursuant to **28 U.S.C. § 1331, 1361 and 2241**, regarding an action to compel an officer of the United States to perform his duty and grant a writ of habeas corpus where a person is in custody in violation of the Constitution or laws or treaties of the United States.

III.

VENUE

5. Plaintiff, Ye, Jianxiong, has been continuously detained by ICE since his entry into the United States. Plaintiff's family members and legal counsel are located in Flushing, New York, and Plaintiff intends to reside there upon release. For the convenience of the parties and in the interest of justice, venue is proper in the Eastern District of New York pursuant to 28 U.S.C. § 1391(e).
6. An actual controversy has arisen and now exists between Plaintiff and Defendant.

IV.

PLAINTIFFS

7. **Plaintiff, Ye, Jianxiong**, A-Number of , a noncitizen currently detained by ICE at Northwest Detention Center.

V.

DEFENDANTS

8. Defendant, the Warden of Northwest ICE Processing Center (also known as Northwest Detention Center) is the immediate custodian of Petitioner within the meaning of 28 U.S.C. § 2241. Defendant exercises direct physical control over Petitioner's confinement and is therefore the proper respondent in this habeas corpus action. Petitioner challenges his continued detention as being in violation of the Constitution and laws of the United States, including the Due Process Clause of the Fifth Amendment and the immigration detention statutes, 8 U.S.C. § 1226 and/or 1231. Pursuant to 28 U.S.C. § 2243, Defendant is required to respond to this Petition and comply with any order directing Petitioner's release.

VI.

FACTUAL BACKGROUND

8. Plaintiff entered the United States on or about January 23, 2025 without admitted or paroled (See **Exhibit 1**), since that time, he was detained at Northwest Detention Center until now (See **Exhibit 2 and 3**).
9. On or about July 14, 2025, the under-sign counsel represented Plaintiff appear the Bond Hearing.
10. On or about October 8, 2025, the under-sign counsel represented Plaintiff appear the Individual Hearing of the Removal Proceeding.

11. On the same day as the Individual Hearing scheduled, the Immigration Judge granted the Plaintiff's Withholding of Removal Application (**See Exhibit 6 to 8**).
12. Plaintiff was granted a Withholding of Removal by the Immigration Judge on or about October 8, 2025 at 1623 East J Street, Suite 3, Tacoma, WA 98421 (**See Exhibit 7 and 8**).
13. Plaintiff was taken into ICE custody since **January, 2025** when he entered the United States.
14. Since October 8, 2025, Plaintiff has remained continuously detained even the Immigration Judge granted his Withholding of Removal.
15. Plaintiff has been continuously detained since his entry into the United States. Plaintiff's family members and legal counsel are located in Flushing, New York, where he maintains strong familial and legal ties.
16. Plaintiff has pursued available immigration relief, including **parole requested**, but remains detained without meaningful review of the necessity of continued confinement.
17. As of the filing of this Petition, Plaintiff has been detained for more than **one year**, far exceeding a reasonable period of civil detention.
18. Plaintiff has no criminal history and has never been charged with any criminal offense. An Immigration Judge has granted Plaintiff withholding of removal, eliminating any basis for his removal. Nevertheless, without any lawful justification, ICE has detained Plaintiff for over one year. Plaintiff is currently confined at the Northwest Detention Center in Tacoma, Washington, a notoriously problematic facility (**See Exhibit 3 and 4**).

This prolonged and arbitrary detention, without legal basis, constitutes a severe violation of Plaintiff's constitutional and statutory rights.

VII.

GROUND FOR RELIEF

- **Ground One**

Unlawful Prolonged Detention in Violation of the Fifth Amendment

15. Petitioner's detention has become unreasonably prolonged and no longer bears a reasonable relationship to the purposes of immigration detention.
16. The government has failed to provide Petitioner with a constitutionally adequate hearing to justify continued detention.
17. Continued detention without individualized findings violates due process under the Fifth Amendment.

- **Ground Two**

Lack of Procedural Safeguards

16. Petitioner has not received a meaningful opportunity to challenge continued detention before a neutral decision-maker with the burden placed on the government.
17. Civil immigration detention may not function as punishment, yet Petitioner's confinement has become punitive in effect.

VIII.

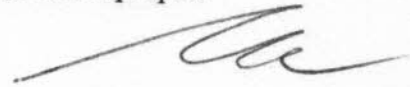
EXHAUSTION OF REMEDIES

18. Petitioner has exhausted all available administrative remedies, or such remedies are inadequate or ineffective to address the constitutional violations raised herein.
19. Further exhaustion would be futile because immigration courts lack authority to order the relief sought in this Petition.

IX.

REQUEST FOR RELIEF

20. WHEREFORE, Petitioner respectfully requests that this Court:
21. A. Issue a Writ of Habeas Corpus ordering Petitioner's **immediate release**;
or, in the alternative,
22. B. Order the government to provide a **constitutionally adequate bond hearing** before an Immigration Judge, with the burden on the government to justify continued detention;
23. C. Grant such other and further relief as the Court deems just and proper.



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