

Adam Oshla Omer

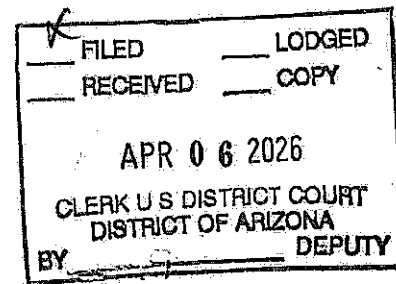
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FLORENCE CORRECTIONAL COMPLEX

P.O BOX 6300

FLORENCE, AZ 85132

PRO SE



UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

Adam Oshla Omer

Petitioner,

Vs.

Luis Rosa Jr, Warden, Central Arizona Florence
Correctional Complex;
Pamela Bondi, Attorney General, U.S. Department of
Justice; and The U.S. Attorney for the District of
Arizona,, et.,,al

Respondents.

CV26-02347-PHX-DWL--DMF

Case No.

A#: [REDACTED]

PETITION FOR WRIT OF
HABEAS CORPUS PURSUANT
TO 28 U.S.C. § 2241

DETAINED

INTRODUCTION

1. Petitioner **Adam Oshla Omer** ("Mr.Omer " or "Petitioner") is a native and Citizen of South Sudan.

Petitioner is a 44 years old.

2. On or about 2004, Petitioner was admitted in the United States as refugee. He never adjusted his status to Lawful Permanent Resident.

On or about 10/02/2025, petitioner was taken into ICE custody and he remains there as of today.

3. Petitioner around August/12/2025, petitioner was ordered removed by an immigration judge to South Sudan and his refugee status terminated.

No alternative country of removal designated for his removal.

Petitioner's removal order became final on 08/12/2025.

Petitioner who was born in Sudan was ordered removed to that country brings this action under 28 U.S.C§ 2241 and the Administrative Procedure Act to enjoin government from removing him to a country not designated by the Immigration Judge like they attempted earlier on 02/28/2026 without giving him an opportunity to apply for withholding relief under CAT.

He also seeks immediate release from immigration custody.

4. ICE earlier forcefully removed petitioner to the Republic Of Senegal on a chartered flight along with 8 other detainees without prior notice or information as to where they were being taken.

The Immigration of that country refused to receive the 8 detainees.

ICE then attempted to channel the flight to Kenya which was blocked by Kenya, they attempted removal to Egypt and Mali which were all rejected and subsequently returned to the United States to Florence Correctional Complex in Arizona.

Mr.Omer is detained pursuant to 8 U.S.C. § 1231, which governs the detention of non citizens with a final order of removal. Mr.Omer 's continued detention violates 8 U.S.C. § 1231(a) because his removal is not reasonably foreseeable. See *Zadvydas v. Davis*, 533 U.S. 678 (2001). He cannot be deported to his home country Sudan because legitimate Travel documents have not been attained by ICE. To the extent that ICE is pursuing Mr. Omer's removal to another third country, it has failed to demonstrate that such removal is reasonably foreseeable. There has been no indication that another country would accept him, and, in any case, Mr. Omer would be entitled to notice and the opportunity to seek fear-based relief with respect to any new possible country of removal.

1 Accordingly, Mr. **Omer** is entitled to immediate release from ICE custody.

2 On 02/28/2026 ICE in collaboration with the United States Marshals refused Petitioner to question where
3 he was being removed to. The government chartered a private plane and on arrival in Senegal, the
4 immigration of that government denied acceptance of the Petitioner along with 8 others.

5 The airplane we were in was surrounded by armed men who denied our exit and ordered the pilot to
6 depart.

7 Communication was done to effect our removal to Egypt and Mali which were all rejected.

8 9 JURISDICTION AND VENUE

10 5. This Court has subject-matter jurisdiction pursuant to 28 U.S.C. § 1331, since this Petition arises
11 under the Constitution and Laws of the United States, namely the detention provisions of the Immigration
12 and Nationality Act, 8 U.S.C. § 1231; the accompanying regulations codified at 8 C.F.R. § 2241; and the
13 Due Process Clause of the Fifth Amendment.

14 6. This Court may grant relief pursuant to the Habeas Corpus Act, 28 U.S.C. § 2241, *et seq.*; the
15 Declaratory Judgment Act, 28 U.S.C. § 2201, *et seq.*; the ALL Writs Act, 28 U.S.C. § 1651; and the
16 Court's inherent equitable powers.

17 7. Federal district courts have jurisdiction to hear habeas claims by non citizens challenging the
18 lawfulness of their detention. *Zadvydas*, 533 U.S. at 687.

19 8. Federal courts also have federal-question jurisdiction, through the APA, to "hold unlawful and set
20 aside agency action" that is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance
21 with law." 5 U.S.C. § 706(2)(A). APA claims are cognizable via habeas. 5 U.S.C. § 703 (providing that
22 judicial review of agency action under the APA may proceed by "any applicable form of legal action,
23 including actions for declaratory judgments or writs of prohibitory or mandatory injunction or habeas
24 corpus"). The APA affords a right of review to a person who is "adversely affected or aggrieved by
25 agency action." 5 U.S.C. § 702. ICE's continued detention of Mr. **Omer** has adversely and severely
26 affected his liberty.

27 9. Venue is proper in this district pursuant to 28 U.S.C. § 2241(c)(3) AND 28 U.S.C. § 1391(b)(2)
28 and (e)(1) because at the time of filing Petitioner was detained in the Florence Correctional Center in
Florence, Arizona, within the Jurisdiction of this Court; a substantial part of the events and omissions

1 giving rise to the claim occurred in this district; Respondent Cantu resides in this district; and the
 2 Respondent is an officer of the United States acting in his official capacity.

3 10. Exhaustion of administrative remedies is not required because it would be futile.

4 PARTIES

5 11. Mr. Omer is a 44 year-old citizen of Sudan who is being detained by Respondents at the Florence
 6 Correctional Center in Florence, Arizona.

7 12. Respondent Luis Rosa, Jr. is the Facility Administrator of the Florence Correctional Center, which
 8 detains individuals suspected of civil immigration violations pursuant to a contract with Immigration and
 9 Customs Enforcement (ICE). Respondent Rosa is the immediate physical custodian responsible for the
 10 detention of petitioner. He is named in his official capacity.

11 13. Respondent Christopher McGregor is the director of ICE's Phoenix Field office, which is
 12 responsible for ICE activities in Arizona and is responsible for the Florence Correctional Center.
 13 Respondent Cantu's place of business is in the District of Arizona, and he is an immediate legal custodian
 14 responsible for Petitioner's detention. He is named in his official capacity.

15 14. Respondent Todd Lyons is the Acting director of ICE. Respondent Lyons is responsible for ICE's
 16 policies, practices, and procedures, including those relating to detention of immigrants during the removal
 17 process. Respondent Lyons is a legal custodian of Petitioner. He is named in his official capacity.

18 15. Respondent MarkWayne Mulin is the Secretary of the U.S Department of Homeland Security. She
 19 is named in her official capacity. In that capacity, Respondent is responsible for the administration of
 20 the Immigration Laws pursuant to 8 U.S.C. § 1103.

21 16. Respondent Pamela J. Bondi is the Attorney General of the United States. She is named in her
 22 official capacity.

23 LEGAL BACKGROUND

24 17. If ICE identifies an appropriate alternative country of removal, the non citizen must have notice
 25 and an opportunity to seek relief from removal to that country. *See Jama v. ICE*, 543 U.S. 335, 348 (2005)
 26 ("If [non citizens] would face persecution or other mistreatment in the country designated under §
 27 1231(b)(2), they have a number of available remedies: asylum, § 1158(b)(1); withholding of removal, §
 28 1231(b)(3)(A); [and] relief under an international agreement prohibiting torture, *See* 8 C.F.R. §§
 208.16(c)(4), 208.17(a)."); *Andriasian v INS*, 180 F.3d 1033, 1041 (9th Cir. 1999) (finding that "last

1 minute" designation of alternative country without meaningful opportunity to apply for protection
 2 "violate[s] a basic tenet of constitutional due process"); *Romero v Evans*, 280 F. Supp. 3d 835, 848 n.24
 3 (E.D. Va. 2017) ("DHS could not immediately remove petitioners to a third country, as DHS would first
 4 need to give petitioners notice and the opportunity to raise any reasonable fear claims"), *rev'd on other*
 5 *grounds, Guzman Chavez*, 594 U.S. 523.

6 18. The Government itself has repeatedly acknowledged this right to notice and an opportunity to
 7 seek relief, including recently before the U.S. Supreme Court, Transcript of Oral Argument at 33, *Riley v.*
 8 *Bondi*, 23-1270 (2025) ("We would have to give the person notice of the third country and give them the
 9 opportunity to raise a reasonable fear of torture or persecution in that third country,"); *see also* Transcript
 10 of Oral Argument at 20-21, *Johnson v. Guzman Chavez*, 594 U.S. 523 (2021). Specifically, if ICE were to
 11 attempt to remove a non citizen to country not designated on their removal order and the non citizen's
 12 removal proceedings would have to be reopened for the IJ to designate the alternative country of removal
 13 and for the non citizen to apply for any fear-based relief in withholding-only proceedings. *See Aden v.*
 14 *Nielsen*, 409 F. Supp. 3d 998, 1006-10 (W.D. Wash. 2019); accord 8 U.S.C. § 1231 (b)(3)(A); 8 C.F.R. §
 15 1240.10(f); 8 C.F.R. § 1240.11(c)(1).

16 **Detention of Non citizens with final order of removal**

17 **A. Statutory Framework**

18 19. 8 U.S.C. § 1231 governs the detention of non citizens "during" and "beyond" the "removal
 19 period." 8 U.S.C. §1231(a)(2)-(6). The "removal period" begins once a non citizen's removal order
 20 "becomes administratively final" 8 U.S.C. § 1231(a)(2)-(6). The removal period lasts for 90 days,
 21 during which ICE "shall remove the [non citizen] from the United States" and "shall detain the [non
 22 citizen]" as it carries out the removal. 8 U.S.C. § 1231(a)(1)-(2). If ICE does not remove the non citizen
 23 within the 90-day removal period, the non citizen "may be detained beyond the removal period" if he
 24 meets certain criteria, such as being inadmissible or deportable under specified statutory categories.
 25 8U.S.C. § 1231(a)(6) (emphasis added). Further, the 90-day removal period is extended where the non
 26 citizen interferes with his removal in bad faith. *Id.* § 1231(a)(1)(C) or 8 U.S.C. § 1231 (a)(6), the non
 27 citizen is released on an OSUP, subject to conditions of release . 8 U.S.C. § 1231(a)(3); 8 C.F.R. §
 28 241.5(a)-(b).

20. To avoid "indefinite detention" that would raise "serious constitutional concerns," the Supreme

1 Court in *Zadvydas* Construed § 1231 to contain an implicit time limit. 533 U.S. at 682. *Zadvydas* dealt
2 with two non citizens with final removal orders who could not be removed to their home country or
3 country of citizenship due to bureaucratic and diplomatic barriers. The Court held that § 1231 authorizes
4 detention only for “a period reasonably necessary to bring about the [non citizen]’s removal from the
5 United States.” *Id.* at 689. Six months of post-removal order detention is considered “presumptively
6 reasonable.” *Id.* at 701. After that point, when the non citizen “provides good reason to believe that there
7 is no significant likelihood of removal in the reasonably foreseeable future, the Government must respond
8 with evidence sufficient to rebut that showing.” *Id.*

9 But the Supreme Court “did not say that the six-month presumption is irrebuttable, and there is
10 nothing inherent in the operation of the presumption that requires it to be rebuttable.” *Munoz-*
11 *Saucedo*, 2025 WL 1750346, at *7-8 (citing *Cesar v. Achim*, 542 F. Supp. 2d 897, 903 (E.D. Wis. 2008).
12 Rather, “the presumption scheme merely suggests that the burden the detainee must carry within the first
13 six months of post-order detention is a heavier one than after six months has elapsed.” *Id.*; see also *Trinh*
14 *v. Homan*, 466 F. Supp. 3d 1077, 1093 (C.D. Cal. 2020) (“*Zadvydas* established a ‘guide’ for approaching
15 detention challenges, not a categorical prohibition on claims challenging detention less than six
16 months.”); *Ali v. DHS*, 451 F. Supp. 3d 703, 708 (S.D. Tex. 2020) (“Whereas the *Zadvydas* Court
17 established a presumption that detention that exceeded six months would be unconstitutional, it did not
18 require a detainee to remain in detention for six months or to prove that the detention was of an indefinite
19 duration before a habeas court could find that the detention is unconstitutional.”).

20 Regulations on Post-Removal Order Detention

21 21. DHS regulations provide that, by the end of the 90-day removal period, the local ICE Field office
22 with jurisdiction over the non citizen’s detention must conduct a custody review to determine whether the
23 non citizen should remain detained. See 8 C.F.R. § 241.4(c)(1), (k)(1)(i) (“Prior to the expiration of the
24 removal period, the district director... shall conduct a custody review”). ICE is required to provide the non
25 citizen and, if applicable, their counsel with approximately 30 days’ notice prior to such custody reviews,
26 to allow an opportunity to submit evidence in support of release. *Id.* § 241.4(d)(3), (h)(2). The regulations
27 further require that custody decisions be provided to counsel. *Id.* § 241.4(d)(3).

28 22. The Field Office Director, or their delegate, makes the final custody decision based on

1 recommendations offered by lower-level officers. In making this custody determination, ICE considers
2 several factors, including the availability of travel documents for removal. *Id.* § 241.4(e). The removal
3 period can be extended, and the non citizen may remain in detention during such extended period if he
4 fails or refuses to make timely application in good faith for travel or other documents necessary for
5 departure. 8 U.S.C. § 1231(a)(1)(C); 8 C.F.R. § 241.5. If the factors in § 241.4 are met, ICE releases the
6 non citizen on an OSUP. 8 C.F.R. § 241.4(j)(2)

7 23. To comply with *Zadvydas*, DHS issued additional regulations in 2001 that established "special
8 review procedures" to determine whether detained non citizens with final removal orders are likely to be
9 removed in the reasonably foreseeable future. *See* Continued Detention of Aliens Subject to Final Orders
10 of Removal, 66 Fed. Reg. 56,967 (NOV. 14, 2001). While 8 C.F.R. § 241.4's custody review process
11 remained largely intact, subsection (i)(7) was added to include a supplemental review procedure that ICE
12 HQ must initiate when "the [non citizen] submits, or the record contains, information providing a
13 substantial reason to believe that removal of a detained [non citizen] is not significantly likely in the
14 reasonably foreseeable future." *Id.* § 241.4(i)(7).

15 24. Under the procedure, ICE HQ evaluates the foresee-ability of removal by analyzing factors such
16 as the history of ICE's removal efforts to the countries in question. *See id.* § 241.13(f). If ICE HQ
17 determines that removal is not reasonably foreseeable but nonetheless seeks to continue detention based
18 on "Special Circumstances," it must justify the detention based on narrow grounds such as national
19 security or public health concerns, *id.* § 241.14(b)-(d), or by demonstrating by clear and convincing
20 evidence before an IJ that the non citizen is "specially dangerous." *Id.* § 241.14(f).

ARGUMENT**25. Prolonged detention without changed circumstances**

Petitioner argues that his continued detention violates the Fifth Amendment's Due process clause under the standard set forth by Zadvydas because he has been detained for over six months and respondents have not shown a likelihood of effectuating his removal.

Petitioner was ordered removed from the United States on 08/12/2025 which is over 240 days (8 months now).

Respondents have attempted to remove him from United States but have been unable to effectuate his removal.

The courts have held that it is presumptively reasonable for the government to detain an alien for a period of 6months while it works to effectuate his removal after issuing a final order of removal against him. Beyond that period, "if removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by statute" and grant the petition for writ of habeas corpus.

Johnson v. Artega-Martinez, 596 U.S. 573,575,142 S.ct. 1987, 213 L.Ed.2d 125 (2022)

Under this statute, a non-citizen ordered removed must be detained for 90 days pending the government's efforts to secure the non-citizen's removal. The statute is however limited to "a period reasonably necessary to bring about [the non-citizen's] removal from the United States and does not permit indefinite detention.

ICE has not identified any countries of removal even though it illegally and forcefully took petitioner along with 8 others to the Republic of Senegal a country that was not designated as an alternative country of removal beside Sudan. Mr. Omer was not given an opportunity to seek protection from that country that he would be persecuted or mistreated but was just bundled up on a chartered plane and forcefully taken before being returned back after being rejected by their government. When Petitioner asked to have his Immigration case re-opened, ICE only made vague statements that his case is "pending" and "being processed."

ICE's failure to allow petitioner seek relief from 3rd country removal.

26. The Government itself has repeatedly acknowledged this right to notice and an opportunity to seek relief, including recently before the U.S. Supreme Court. Transcript of Oral Argument at 33, *Riley v. Bondi*, 23-1270 (2025) ("We would have to give the person notice of the third country and give them the opportunity to raise a reasonable fear of torture or persecution in that third country,"); *see also* Transcript of Oral Argument at 20-21, *Johnson v. Guzman Chavez*, 594 U.S. 523 (2021). Specifically, if ICE were to attempt to remove a non citizen to country not designated on their removal order and the non citizen's removal proceedings would have to be reopened for the IJ to designate the alternative country of removal and for the non citizen to apply for any fear-based relief in withholding-only proceedings. *See Aden v. Nielsen*, 409 F. Supp. 3d 998, 1006-10 (W.D. Wash. 2019); accord 8 U.S.C. § 1231 (b)(3)(A); 8 C.F.R. § 1240.10(f); 8 C.F.R. § 1240.11(c)(1).

Release is the most common and appropriate remedy for a *Zadvydas* violation. (ordering release under appropriate conditions ICE could not show progress in removal Sudan.

To order Mr. Omer's immediate release, this Court need only determine that his removal is not reasonably foreseeable under *Zadvydas*.

ICE's Failure to Comply with Its Own regulations Violates the Due Process Clause and the APA Pursuant to *Accardi*.

27. The Government itself has repeatedly acknowledged this right to **notice and an opportunity to seek relief**, including recently before the U.S. Supreme Court. Transcript of Oral Argument at 33, *Riley v. Bondi*, 23-1270 (2025) ("We would have to give the person notice of the third country and give them the opportunity to raise a reasonable fear of torture or persecution in that third country,"); *see also* Transcript of Oral Argument at 20-21, *Johnson v. Guzman Chavez*, 594 U.S. 523 (2021). Specifically, if ICE were to attempt to remove a non citizen to country not designated on their removal order and the non citizen's removal proceedings would have to be reopened for the IJ to designate the alternative country of removal and for the non citizen to apply for any fear-based relief in withholding-only proceedings. *See Aden v. Nielsen*, 409 F. Supp. 3d 998, 1006-10 (W.D. Wash. 2019); accord 8 U.S.C. § 1231 (b)(3)(A); 8 C.F.R. § 1240.10(f); 8 C.F.R. § 1240.11(c)(1).

Agencies are bound to follow their own policies that affect the fundamental rights of individuals, including self-imposed policies and processes that limit otherwise discretionary decisions. *See Accardi*, 347 U.S. at 267 (holding that BIA must follow its own regulations in its exercise of discretion); *Morton v. Ruiz*, 415 U.S. 199, 235 (1974) ("Where the rights of individuals are affected, it is incumbent upon

1 agencies to follow their own procedureseven where the internal procedures are possibly more
2 rigorous than otherwise would be required.").

3 28. When agencies fail to adhere to their own policies as required by *Accardi*, courts frame the
4 violation as a due process violation or as arbitrary, capricious, and contrary to law under the APA. *See*
5 *Sameena, Inc. v. United States Air Force*, 147 F. 3d 1148, 1153 (9TH Cir. 1998) ("An agency's failure to
6 follow its own regulations tends to cause unjust discrimination and deny adequate notice and
7 consequently may result in a violation of an individual's constitutional right to due process.")

8 29. To remedy an *Accardi* violation, a court may direct the agency to properly apply its policy, or a
9 court may apply the policy itself and order relief consistent with the policy. *Damus v. Nielsen*, 313 F.
10 Supp. 3d 317, 343 (D.D.C. 2018) ("[T]his Court is simply ordering that Defendants do what they
11 already admit is required."); *Jimenez v. Cronen*, 317 F. Supp. 3d 626, 657 (D. Mass. 2018) (scheduling
12 bail hearing to review petitioners' custody under ICE's standards because "it would be particularly
13 unfair to require that petitioners remain detained ... while ICE attempts to remedy its failure.").

14 Accordingly, this Court should order Mr Omer's release on the same conditions with which he was
15 previously complying.

16 CLAIMS FOR RELIEF

17 COUNT I -- (PROLONGED DETENTION) VIOLATIONS of 8 U.S.C. § 1231 (a)(6)

18 30. Mr. Omer re alleges and incorporates by reference the paragraphs above as though fully set
19 forth herein.

20 31. 8 U.S.C. § 1231 (a)(6), as interpreted by the Supreme Court in *Zadvydas*, authorizes detention
21 only from " a period of reasonably necessary to bring about the aliens removal from the United States.
22 " 533 U.S. 689, 701.

23 32. The 90-day removal period and the six month presumptive reasonable period from *Zadvydas*
24 have long since expired ,and Mr.Omer's removal is still not reasonably foreseeable. Therefore,
25 his continued detention violates 8 U.S.C. § 1231 (a)(6) and requires his immediate release.
26
27
28

**COUNT II – VIOLATION OF THE DUE PROCESS CLAUSE OF THE
FIFTH AMENDMENT**

33. Mr. Omer re alleges and incorporates by reference the paragraphs above as though fully set forth herein.

34. 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. Amend. V. Respondents were required to provide Mr. Omer with notice and a meaningful opportunity to re-open his immigration case and allow him an opportunity to raise a reasonable fear-based claim of torture or persecution before being removed to any third country.

COUNT III – UNLIKELIHOOD OF REMOVAL TO SUDAN

35. Mr. Omer re alleges and incorporates by reference the paragraphs above as though fully set forth herein.

36. Courts must "hold unlawful and set aside agency action" that is "arbitrary, capricious, an abuse of discretion, or otherwise not in accordance with law." 5 U.S.C. § 706 (2)(A).

37. Petitioner is unlikely going to be removed to Sudan his native country because the government/ICE have not initiated any process of getting a legitimate travel document from the government of Sudan, instead, they attempted illegitimate methods of removing the petitioner to Senegal so that Senegal could remove him to Sudan which Senegal refused.

COUNT IV - ICE's failure to allow petitioner seek relief from 3rd country removal.

COUNT V - ICE's Failure to Comply with Its Own regulations Violates the Due Process Clause and the APA Pursuant to *Accardi*.

PRAYER FOR RELIEF

Petitioner respectfully requests that this court:

1. Assume jurisdiction over this matter;
2. Order Respondents to show cause why the writ should not be granted within three days, and set a hearing on this Petition within three days of the return, as required by 28 U.S.C. § 2243;
3. Grant the writ of habeas corpus and order Petitioner's immediate release under reasonable supervision;
4. Declare that Petitioner's detention violates 8 U.S.C. § 1231 and the Fifth Amendment's Due Process Clause;
5. Issue an order pursuant to 28 U.S.C. § 2243 directing Respondents to show cause why the writ of habeas corpus should not be granted;
6. Enjoin Respondents from further detention absent a significant likelihood of removal in the reasonably foreseeable future;
7. Grant such other relief as the Court deems just and proper.

Respectfully submitted this 31 day of March, 2026

Signed by:

Adam Oshla Omer

Adam Oshla Omer

Petitioner, Pro Se.

CERTIFICATE OF SERVICE

PLEASE TAKE NOTICE that on March 31, 2026, Petitioner filed with the United States District Court for the District of Arizona, this Petition for Habeas Corpus. **I, Adam Oshla Omer Pro Se**, do hereby state that I caused a copy of Petition for Habeas Corpus to be served upon the listed individuals below at the indicated addresses via certified U.S. mail (in the event the Court does not issue the summons).

TO: Luis Rosa Jr, Warden

Central Arizona Florence Correctional
Complex
1155 North Pinal Pkwy,
Florence, AZ 85132

Christopher McGregor, Director

ICE Enforcement and Removal Operations,
Phoenix Field Office
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Phoenix, AZ 85004

Todd Lyons, Acting Director
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Signed by: Adam Oshla Omer

Adam Oshla Omer

Petitioner, Pro Se.