

Cheikhou Sarr

NAME [REDACTED]

PRISON NUMBER [REDACTED]

Imperial Regional detention facility

PLACE OF CONFINEMENT

1572 Gateway Road

ADDRESS

Calexico, CA 92231

FILED  
APR 10 2026  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY [Signature] DEPUTY

United States District Court  
Southern District Of California

Cheikhou Sarr

(FULL NAME OF PETITIONER)

Petitioner

Civil No. '26CV2343 RBM MSB

(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:

DHS

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: Immigration Court, Imperial  
2409 La Brucherie Rd 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): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

(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:

Given I am asserting a due process violation, it would be futile especially since the DHS and my ICE officer had made it clear to me they would not release me

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: It would be  
fruitless

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 have been detained for 10 months  
since my arrest on May 29 2025

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

Courts in this circuit have recognized  
the six month presumptively reasonable  
period of detention if the person can  
demonstrate there is no significant likelihood  
of release

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

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

Yes  No

**GROUND TWO:** There is no significant likelihood of removal in the near future.

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

the duration of my current detention is uncruel and usual punishment. I was released on parole Jan 16, 2024. I have been working in the United States since then. I was gainfully employed and paying taxes. I went to court for my first hearing and was arrested. I had a bond hearing on March 4th, 2026 and I was denied bond. First, my arrest was unjust and illegal because I was already on up parole. Please Judge ask ICB why they arrested me and declare that my arrest was unconstitutional.

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

Yes  No

**GROUND THREE:** My detention has become unconstitutionally prolonged and violates the fifth Amendment

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

The fifth Amendment entitles aliens to due process in deportation proceedings. The due process clause applies to all persons in the United States including aliens whether their presence here is unlawful, temporary or permanent.

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

Yes  No

**GROUND FOUR:** The conditions of Confinement resembles prison. It is even worst than prison according to people here who went to prison

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

I am experiencing pshycological, mental and emotional problems. I have not been able to communicate with my family. We stay indoors without the sun for hours on end. I even have nightmares when I sleep. The officers treat us like animals. They are very disrespectful. Please Judge release me from here immediately in God's name.

(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:

I did not have any reason to present 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.

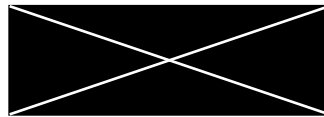
*I request release from custody.*

\_\_\_\_\_  
SIGNATURE OF ATTORNEY (IF ANY)

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

*4-2-2026*

\_\_\_\_\_  
(DATE)



\_\_\_\_\_  
SIGNATURE OF PETITIONER