



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

Ibrahim Olawale-Bankole

'26CV2400 CAB VET

Petitioner,

**INJUNCTIVE RELIEF
TEMPORARY RESTRAINING ORDER**

v.

Todd Blanche, U.S. Attorney General,
Markwayne Mullun, Secretary of DHS,
Todd Lyons, Director of ICE,
Christopher LaRose, Warden of Otay Mesa Detention Center
Respondent's

**MOTION FOR TEMPORARY RESTRAINING ORDER,
AND
INJUNCTIVE RELIEF**

TEMPORARY RESTRAINING ORDER

Petitioner-Plaintiff, Ibrahim Olawale-Bankole moves this court ex parte for a Temporary Restraining Order that would among other things, require his immediate release from his ongoing detention by agents of Immigration and Customs Enforcement (ICE) and prohibit his re-arrest without pre-detention hearing before an "IJ" Immigration Judge at which ICE establishes by clear convincing evidence that his detention is necessary to prevent his flight risk or protect the public.

Background :

The evidence before this court establishes that Ibrahim Olawale-Bankole is a 43-year old from Nigeria. Petitioner came into the United States on 11-30-2022 in fear of his life seeking protection through Asylum in Calexico California. Petitioner was questioned and interviewed by an Asylum officer and was found Credible on his Fear. On or about January,7,2023 Petitioner was then released by DHS/ICE under his credible fear finding and allowed Petitioner to commence his Asylum process from out of detention. Once Petitioner was released he began looking for legal assistance to help him file his I-589 which he thought he had found the correct person who only charged him \$150.00 USD to fill out the form. Unequivocally the person who filled out the form was not entitled to do so and had no experience and only damaged Petitioner even more. Here Petitioner managed on living with a friend on his own since Petitioner did not have a Work Authorization Card and Petitioner followed the law. After January 2024 Petitioner did not Petitioner finally received his Work Authorization Card but began working on approximately 2025 after earning his CDL License to to work for Truck Company Opeyemi E. Transportation LLC. Petitioner continued working for truck company and remained compliant to the check-ins required by ICE and never failed any check-ins. On 2024-2025 Petitioner had an encounter with the San

Diego Police Department for a disturbance call and later was released on 2-26-2025 on a \$3,000 USD bond with no further incident, conviction, charges, or probation. Afterwards Petitioner went back to his job. Approximately a year later ICE sent Petitioner a message alerting him to show up to his check-in which Petitioner did on 1-22-2026. Once in the office ICE arrested Petitioner without a warrant out for Petitioner's arrest violating his Due Process Right under the 14th Amendment of the U.S. Constitution. Once in ICE custody I have continued with my Asylum case and now find myself in the BIA since the IJ denied my Asylum claim on 8-20-2024 by IJ Najjar George. My BIA Appeals remains pending and I have through counsel submitted my Brief on 3-6-2026. On 2-5-2026 through counsel filed a Habeas Corpus to this Honorable Court which was granted with instructions to afford me a bond hearing in front of an Immigration Judge. On 3-16-2026 I went in front of IJ Eh Harrison whom wrongfully denied my bond based on finding me a Flight Risk and not a Danger to the Community. Here it is clear that the Immigration Judge's are making unmistakably wrongful and **BIAS** decisions based on fear of being fired by President **Donald J. Trump** whom has already fired more than 100 Immigration Judges through the **DOJ**. As well Petitioner clearly shows indisputably that he is not a Flight Risk since he has **ZERO** absconding charges, or **FTA** Failure to Appear to any court hearings, ICE meetings, and never fled any scene or from any type of Law Enforcement Agency. So here goes Petitioner seeking through this well oiled machine to grant him relief on a Immediate Release. Petitioner request that this court grant the Temporary Restraining Order so Respondent's cannot transfer Petitioner out of the Jurisdiction of the court or from Otay Mesa Detention Center until the Habeas Corpus is adjudicated. My health has worsen because I have developed depression, anxiety, and major stress disorder because of the prolonged detention I have spent in custody and not being able to be by my immediate family. I have not received any incident reports for

misbehavior since I have been detained here at Otay Mesa Detention Center and have been in good behavior while in ICE custody. I am requesting for this Temporary Restraining Order to be put in place so ICE won't be able to transfer me or deport me before this Habeas Corpus is adjudicated. It's clear that ICE violated Petitioner's Due Process Right to 14th Amendment of the U.S. Constitution by arresting him without a warrant

CITING CASE LAW: Jose Antonio Ambrocio Garcia case No. 25-cv-03319 (2025)
Carmen Araceli Pablo Sequen Case No. 25-cv-06487
and F.T.C. v. Dean Foods and many more other cases that are
being gathered.

Date: 4-13-2026



Ibrahim Olawale-Bankole



Otay Mesa Detention Center
P.O. Box 439049
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