

1 ADAM GORDON
United States Attorney
2 DANIELLE L. BROWN
Colorado State Bar No. 57814
3 Special Assistant U.S. Attorney
HUNTER V. NORTON
4 Washington D.C. Bar No. 1780736
Assistant U.S. Attorney
5 Office of the U.S. Attorney
880 Front Street, Room 6293
6 San Diego, CA 92101
Telephone: (619) 546-8693
7 Facsimile: (619) 546-7751
Email: Danielle.Brown2@usdoj.gov
8 Email: Hunter.Norton2@usdoj.gov
9 Attorneys for Respondent

10
11 UNITED STATES DISTRICT COURT

12 SOUTHERN DISTRICT OF CALIFORNIA

13
14 FANKOUA-NDJANTOU GOLDONI
GHISHIAN,

15
16 Petitioner,

17 v.

18 JEREMY CASEY, *Warden, Imperial*
19 *Regional Detention Facility,*

20 Respondent.
21

Case No.: 26-cv-02624-TWR-VET

22
23 RETURN TO PETITION FOR
24 WRIT OF HABEAS CORPUS

25
26 Petitioner has filed a habeas petition under 28 U.S.C. § 2241. Petitioner is subject to
27 mandatory detention under 8 U.S.C. § 1225(b). *See Jennings v. Rodriguez*, 583 U.S. 281
28 (2018). However, the government acknowledges that courts in this District have repeatedly
inferred a constitutional right against prolonged mandatory detention. Taking into
consideration those prior rulings and the length of time Petitioner has been in custody, the
government concedes that this Court should order that Petitioner receive a bond hearing,

1 where the government would bear the burden of proof of establishing, by clear and
2 convincing evidence, that Petitioner poses a danger to the community or a risk of flight.
3 *See Sadeqi v. LaRose*, No. 25-cv-2587-RSH-BJW, 2025 WL 3154520 (S.D. Cal. Nov. 12,
4 2025); *Gao v. LaRose*, No. 25-cv-2084-RSH-SBC, 2025 WL 2770633 (S.D. Cal. Sept. 26,
5 2025).

6
7 DATED: May 4, 2026

ADAM GORDON
United States Attorney

8 s/ Danielle L. Brown
9 DANIELLE L. BROWN
10 Special Assistant United States Attorney
Attorneys for the Respondent
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28