

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

FILED APR 27 2026
MDG-CL

Hamid Samadi A#

Petitioner,

V.

Case Number: _____

United States Attorney General;
Secretary of Department of
Homeland Security;
Director of U.S. Immigration and Customs
Enforcement,

Respondents.

**EMERGENCY VERIFIED PETITION FOR BOND HEARING
UNDER APPLICABLE WRIT OF HABEAS CORPUS**

Hamid Samadi, pro se petitioner, respectfully files his Emergency Verified Petition for Bond Hearing and requests this Honorable court to grant the petition. Petitioner provides the followings:

INTRODUCTION

Petitioner ("Samadi") is re-detained the third time by ICE and it seems that ICE has locked him up in Stewart Prison ("Stewart Detention Center") and has thrown away the key-as described below:

He entered the U.S. with F-1 Visa via JFK airport in N.Y., N.Y., on February 5, 1977 and has had continuous physical presence for roughly almost **FIFTY (50) years. See Exh. A**

In 1984, Samadi was detained by Immigration and Naturalization Service ("INS"), placed in removal proceedings for an over-stay and a change of plea to guilty (at the ill-advice of a public defender), which resulted in a suspended sentence of a year and a day, for a theft of a tent (that sleeps ten people-ex-large box), while he was in the Sears department store. The agent took his passport and finally released him on \$15,000.00 bond with nearly a month of detention then. Exh. D pg.2.

In 1992, his removal became final (under some fictitious "*Proceeding commended on or after April 1, 1997...*", which he was not aware. Exh. F pg. 2 (top-left of the page)

In January 2002, he married his first U.S. Citizen wife, supported her and her young children (from her prior marriage, when that Ex-husband was still verbally and physically abusive). His wife filed an I-130 sponsorship application along with a I-485 (adjustment of Status), I-765 (work authorization) and other related applications. As a result of her inquiries from the Atlanta filed office,

Samadi was called in for an interview and ICE detained him for the second time, in April 2003, then informed him for the first time, that he has a Final Order of Removal ("F.O.R.").

During this detention, ICE attempted to obtain his travel document ("TD") with Samadi's full cooperation and was unsuccessful, since Iran required his Original Birth Certificate and Passport (in which INS lost his only original document 'passport' Iran required). See Exhibit E. Absent of original passport, Samadi can not obtain TD to be removed to Iran.

After this rejection from the Iranian consulate, even though by ICE's own actions Samadi's detention became meaning less, ICE continued its detention until Samadi filed a Habeas petition and when the government had no response to the petition, released him under an Order of Supervision ("OSUP"), in February 2004 (nearly ten months of detention). Exh. F-pg.2, and his continuous monthly, quarterly, semi-annual and annual reporting to ICE started. Exh. G.

That ten month detention took a full toll on his wife and the marriage, which ended up in separation and finally divorce, harming the U.S. Citizen family irreparably.

The F.O.R., lost passport, and the political events of the last two decades in the U.S. with lack of decisions or support for non-citizens who have been living in limbo, in the U.S. for decades (like petitioner) did not help.

Petitioner remarried another U.S. Citizen wife in Feb., 2015 and have two biological U.S. citizen young children together. Exh. H pgs. 1-4. Samadi has been in their daily lives since birth, been their tower, teacher, ... entertainer, cook, chauffeur, and all around servant, responsible for their education, health and well being as a true father should be, while his wife (mom), has been the U.S. Dep't of Defense (DOD) civil servant for nearly a decade.

On December 11, 2025, when he reported to the ICE, Atlanta filed office for his OSUP appointment, ICE re-detained him again, revoked his OSUP (even though Samadi did not violate any condition of his bond from 1984 nor his OSUP of 2004). Exh. I (revoked Release claiming "Changed Circumstance"). Since then, the children cry themselves to sleep every-night and miss their activities, because this unreasonable, unjustifiable, inhumane, and endless detection is harming them emotionally, mentally and now physically. See Exhibit 8. (Kids, mom and an attorney's letter to the ICE directors).

FACTS

With this third detention, thus far, Samadi has been in ICE/DHS/INS custody for a cumulative **amount of exceeding fifteen (15) months**. Samadi has no remedy to pursue- since his administrative doors have been closed years ago and the BIA denied his only chance of a 'Motion to Reopen' during his 2003 detention.

In this third detention, Samadi, moved the immigration court for a bond hearing, but on 12/22/25 the Judge ("IJ") denied the motion for a lack of subject matter jurisdiction. See Exh. 6.

It took ICE deportation officer 32 days to visit him (1st time) since his detention, provided blank forms and received his filled TD application, took his picture, had him sign blank forms, was informed:

1. Samadi has not tied to Iran since he has been in the U.S. for almost 50 years (since 2/5/1977); see Villagas-Sarabia v. Johnson 123 F. Supp. 3d 870 (U.S.D.C. West Tx.) (8/17/2015), 2015, 5th Cir. U.S. Dist. LEXIS 107754* which refers to many case of "Continuous Physical Presence" see also, See INS. V. Phinpathya, 464 U.S. 183 (1986), The **Supreme Court** summed up similarly as my situation (based on the Act which I would fall under); "*When congress in the past has intended for a 'continuous physical presence' requirement to be flexibly administered, it has provided for authority for doing so. For Example, former § 301(b) of the [***14] Act, which required two [*190] years of '[continuous][physical][presence]' for maintenance of status as a United States national or citizen, provided that 'absence from the U.S. of less than sixty days in the aggregate during the period for which continuous physical presence in the United States is required shall not break the continuity of such physical presence.'*" 86 State.1289.

See Okeke v. Gonzales 407 F. 3d 585 (3rd Cir), (2005 U.S. App. Lex. 8883)(10/24/2004 Okeke sought cancellation of removal under 8 U.S.C.S. § 1229b (b); "*with a conviction of possession of Marijuana that occurred before his last legal re-entry had not stopped the clock from running his continuous physical presence...*" It seems that my crime of 43 years ago is not only less severe crime, but also, long before any of these statutes (3-4 decades).

In Tefel v. Reno, 180 F3d 1286... (11th Cir.), the court summed up:
 "...prior to IIRIRA's amendment to the INA, an alien facing deportation could apply for 'suspension of deportation'. In order to be eligible for suspension of deportation, an alien was required to establish [*1289] four factors. INA §§ 244(a)(1) & (2), 8.U.S.C. §§ 1254 (a)(1) & (2) (1991). One of these factors was that the alien has been 'Physically Present in the U.S. for a continuous period of not less than 10 years after becoming deportable or 7 years before filing suspension of deportation.'" Tefel v. Reno. It seems that either way we calculate, I would have been eligible very long ago (last 20 years).

2. All his family members, friends, helpers... are U.S. citizens (including parents).

3. Iran did not issue TD in 2003 (Exh. E), when the relationship between Iran and the U.S. was a lot better (although strained), but Iran was assisting U.S. in its war against Taliban, providing fuel and logistics, yet, Iran asked for the original passport before it could issue a TD.

4. Now, since before my detention, President Trump was sounding the war drums and is now at war. If Iran did not issue TD (Exh. E), when they were jointly fighting Taliban (peace between them). *Id.* Are respondents hallucinating (respect intended) that Iran will issue TD while it is getting bombed daily.

5. Samadi's wife works for the very same U.S. agency (DOD) which is bombing Iran. Her life will be at very least in danger if she does not face immediate death when she is sent to Iran with her family. Nsimba v. AG of the United States, 21 F. 4th 244 3rd Cir, 12/22/21, "*BIA misapplied & misinterpretation controlling precedent and imposed requirement on those seeking relief for asylum that would require petitioners to first endure torture or arrest. A refugee did not need bear the scares or disfigurement or mutilation to establish objective reasonable fear...*" Exh. 1 pgs.2-3 (wife works for [DOD], "*Fear*", have been requesting Fear Interview since Jan. 11, 2026- three months ago). The Government's own requirements state interview must be given within 10 days. C.F.R. § 1208.31. "In the absence of exceptional circumstances", this determination will be conducted 10 days of referral." "*The Government locked me up and threw a way the key*", did not offer such and keep ignoring Samadi.

See also, Hermosillo v. Garland, 80 F. 4th 1127, 2023 U.S. App. Lex. 24406** 9th Cir. 10/3/23, "We remand this case to the agency with instructions to provide Hermosillo with a hearing before an IJ on the merit of his..." Also, Pino-Porras v. AG United States, 2025 U.S. App. Lex 15644 (3rd Cir.) 7/25/2025, refer to IJ on remand to determine fear..., Estrada v. Bondi, 2025 U.S. App. Lex. 21644, 2025 LX 346096, 2025 WL 2438737 (9th Cir.) 8/14/25, Court held: "IJ's use of the term 'likely' indicated that he held (alien) to a higher burden than merely showing a 10% likelihood of persecution or torture, which is the correct reasonable possibility standard for 'reasonable fear' determination." Alvarado v. Wmskey, 2026 U.S. Dist. Les 33129 (U.S.D.C. Western Wa) (2/18/2026), 2026 WL 456817, Concluded: "Although court does not have plaintiff's request to stay, but retains jurisdiction over petitioner's request for 'reasonable fear' determination, she is entitled... (1) refer petitioner to an asylum officer for 'reasonable fear'... (2) provide status report to the court within 7 days..." See Exh. 1; over three months into Samadi's demanding "Fear Interview", The Respondents did not offer one and keep ignoring him.

6. Samadi's young family is experiencing extreme hardship due to his unjustifiable, illegal and now inhumane extended detention.

7. Samadi plead to the IJ for a bond hearing and his motion was denied on 12/22/25. Exh. 6.

8. Since his detention, ICE officers have been unresponsive besides a visit 32 days into his detention (on Jan. 11 or 12, 2026), to collect a TD application, picture, gather information, give him blank forms to sign, discussed wife' DOD, employment, FEAR of returning to Iran, and discussed alternative 3rd countries removal such as Canada, Mexico, and others. The officer also knew that it is impossible to obtain TD from Iran. See Exhibit 1- pg 2.

Since this visit with an ICE officer over three months ago,

9. Samadi saw him once again; he had no answer/response to any questions; other than; he will see Samadi "...next Monday or Tuesday after speaking with a supervisor." That was over 4 weeks ago.

10. Since Jan 11-12, Samadi has repeatedly asked to speak with him, his supervisor, have any supervisors to speak with his 2 attorneys and made many other requests. All these requests since his detention of 12/11/25 has been ignored. Exh. 1.

11. Since 01/11-12/26, Samadi has been asking to be sent to Mexico, and even repeatedly begged to take him to the border and he will walk on foot crossing border to Mexico. *Id* at 2-4.

12. His letter to Headquarter of ICE Post Detention ("HQPDU") (Exh. 7), and Atlanta Field Office Director (Exh. 7) for any sort of conditional release has been ignored thus far.

13. Most of his requests are answered in a confusing, vague, or even unfamiliar manner. Exh. 1. I.e. a month after getting Samadi's TD application, he is told, "An officer will be over to see you to get your TD application/info." *Id* at 2 (response to his Feb. 10, Request # 654872721); or that "Working on your TD", *Id* at 3-4; or mostly, "I forwarded your concerns to your ICE officer."; "I forwarded your concerns to a supervisor." *Id* at 3-4. However, nothing is happening, no responses, no visit, no information is provided.

14. On April 8, 2026, Samadi exhaustively motioned the IJ for a "Custody Re-determination". Exh. 9. Despite Samadi's objections, informing the IJ that he had such hearing on 12/22/25 - IJ converted his motion to a 'motion for bond hearing'. IJ again denied this motion. Exh. 10.

As stated above, It is very clear that Respondents locked him up in Stewart prison and throw-a-way the key. No one is responding to any facts, requests, letters, or pleadings.

15. Samadi has continually begged ICE agent to send him to Mexico via foot by crossing the Southern Texas border. ICE refused to respond. Exh.1 pg. 2-4.

16. Samadi has even begged Mr. Lyons, Director of HQPDU, pleading for his family (not himself) (with all supporting evidence), to release him, giving his family a short time for them to find another country and be out-of-the-U. S. Samadi reasoned that government was not prejudice all these decades of his release; allowing his family to leave united in one-two years, will not cause any harm to the government. See Exh. 7 at 1, ¶¶ 4, at 2, at 7, ¶¶ 2.

17. Similarly to paragraph 16 (above), he also tried the ICE Atlanta Field office Director, pleading for his family again with all of the evidence, let this family find a third country. See Exh. 7 pgs 5-6.

18 And finally, a family member attempted to secure Samadi's passage from detention ^{via} to ~~to~~ neighbors to the north and south – unsuccessfully. See Affidavit of Fatemeh Sharif-Askary - ¶¶ 4-6.

Legal Arguments

"A writ may be issued to a petitioner who demonstrate that he is being held in custody in violation of the constitution and federal law." See Manaf v. Geren, 553 U.S. 674, 693, 128 S. Ct. 2207, 171 L. Ed – 2d (2008), see 28 U.S.C. § 2241 (c)(3). Samadi entered the U.S. with F-1 visa (legally) and is "an 'Admissible' alien" entitled to the U.S. Constitutional rights. See also, Arcoco v. Mason, 2026 U.S.D. LEXIS 26337*, 2026 LX 95020, F. Supp. 3d. (WV, Feb. 2026) Court distinction between arriving alien *versus* residence: "... non-citizen who has been physically present in to U.S., *versus* to ones who crossed or stopped at to border even in light of application of the new law 2025 amendment of § 1226(c) – providing more rights under 4th and 5th Amendment."

"The Court's jurisdiction extends to challenges involving immigration related detention." see Zadvydas v. Davis, 533, U.S. 678, 687, 121 S. Ct. 2491, 150 L. Ed. 2D 653 (2001). Therefore, this court can review Samadi's case and Order an expedited, reasonable, persuasive, and legitimate bond hearing.

Furthermore, based on the decision of a sister court of this 11th Cir, in Policarpo v. Parra, 2025, U.S. Dist LEXIS 264048*, 2025 LX 550528 (Southern Dist. Fl., Dec. 22, 2025), the court held: *"the INA provides, in relevant part, that a court can review a final order of removal only if the non-citizen 'has exhausted all administrative remedies available' to the non-citizen as a right."* 8 U.S.C. § 1252(d) (1). The only remedy available to Samadi was the Motion to Reopen, which BIA denied in Sept. 2003.

Moreover, Samadi has not requested a 'bond re-determination' hearing nor appealing the IJ bond ruling, since he knows his appeal to BIA will not produce any differently than the I.J. He insists that the exhaustion requirement is 'prudential', not 'jurisdictional'..., since appealing immigration Judge's

decision who dismissed/denied his bond -due to a lack of jurisdiction (because he has a F.O.R.) does not set grounds to appeal to the BIA, **leaving him without remedy**, and BIA will have no option but to dismiss the appeal, or confirm the IJ's decision – denying bond.

But, Exhaustion is not a stringent requirement. See Indrawati v. U.S. Att'y Gen., 779F. 3d 1284, 1297 (11 Cir. 2015). "*Petitioner need not exhaust administrative remedies if 'the administrative body is show to be biased or has otherwise predetermined issue before it.'*" See McCarthy v. Madigan, 503 U.S. 140, 148, 112 S. Ct. 1081, 117 L. Ed. 2D 291 (1992). See also Linfors v. United States, 673 F. 2d 332, 334 (11th Cir. 1982) "*Exhaustion is not required where no genuine opportunity for adequate relief exist... or administrative appeal be futile[.]*" (citation omitted). "*...requiring petitioner to exhaust Administrative Remedy would be futile because the result is predetermined*" in Matter of Yajure Hurtodo, 29 I &N Dec. 216 (BIA 2025).

Samadi's detention of 15 months has crossed the line of being illogical, unreasonable, unjustifiable, inhumane, and in violation of the Constitution and federal laws. See many citations of "Cumulative" detention period... See Exh.11.

Here, Samadi is not challenging anything other than the fact of his detention while his U.S.C. family is suffering his absence. Samadi has repeatedly plead to ICE to at least take him to the Mexican border, so that he could leave the U.S. **ON FOOT**, and have his family join him in Mexico. Exh. 1, pg. 2-4. There is no reason for agonizing, tormenting, and dramatizing young kids unnecessarily. In Mago v. Rogers, 2026 U.S. Dist. Lex 39269", 2026 LX 38989, 2026 WL 532485, (Middle District of Fla., Ft Myers div., 2/25/2026), Respondent argued: "*Court has no jurisdiction under 28 U.S.C. § 2241 and § 1362 and § 1651...*" But court reasoned: "*8 U.S.C § 1252(g) jurisdictional bar is narrow; it only applies to three discrete actions that the Attorney General may take. Mago does not challenge the commencement of a proceeding, the adjudication of case, or the execution of his removal order. It challenges the legal basis of his detention, thus falls squarely under the court's jurisdiction for habeas review. Non citizens detained under § 1226(a) or § 1231 are entitled to a bond hearing.*" See also, Jennings v. Rodriguez, 583 U.S. 281, 306, 138 S Ct. 830, 200, Ed. 2D 122 (2018); ("*Federal regulations provide that aliens detained under § 1226 (a) receive bond hearing at the outset of detention.*" citing 8 C.F.R. §§ 236.1 (d)(1), 1236.1 (d)(1). § 1231 governs detention of non-citizens ordered removed. Subsection (a)(2) requires of non-citizens during the removal period which begins on the date the removal order becomes administratively final."

Even though Samadi FEARS that there is no safety provided outside the U.S. for his family (especially the young kids); yet, unlike other non-citizens who refused removal to Mexico (i.e. Cubans), in order to be released from this indefinite terrifying detention (which caused severe hardship on his U.S.C. family of young kids), he has chosen the option of a dangerous and unsafe country, to create protection for his family. The IRONY of "the lesser of the two evils."

Government argument even under 8. U.S.C. § 1231 will fall short- since the "removal of non-citizen who is ordered removed should occur within ninety days", § 1231 (a)(1)(A); as read by the Supreme Court, "[a] statute permitting indefinite detention... would rise serious Constitutional problem."

Samadi was released on bond of \$15,000.00 on or about Nov. 16, 1984, and had not violated any

condition of that bond. Yet, he was again detained on April 2003- 2004 for 10 months and again released (this time under OSUP). And again detained on Dec. 11, 2025, without any violation to the terms of his bond or OSUP. Yet, Respondents have not produced any evidence to prove that there is a TRULY "Changed Circumstance" to revoke his OSUP on 12/11/2025. See Exh. I pgl. There is no justification for this third detention to make his U.S.C. family of young kids to suffer. In Parada Hernandez v. Johnson, 2025 U.S. Dist. LEXIS 249952 (U.S. Tx. N.D. Dallas Div), the court addressed the issue of freedom. It held; "Freedom from imprisonment – from government custody, detention, or other forms of physical restraint-lies at the heart of the liberty [the Due Process] clause protected." See also, Vieira v. DeAnda-Ybarra, 2025 U.S. Dist. LEXIS 203930 (Western District of Texas, El Paso Div. 10/16/20025).

ICE's revocation of Samadi's OSUP for 'changed circumstances' raises many issues - reasoned by many courts. "Preparing to change circumstances is different from 'changed circumstances.' [*9]" [T]hese kind of vague assertion-akin to promising the check is in the mail-insufficient to meet ICE's own requirement to show 'changed circumstances' or a 'significant likelihood that the alien may be removed in the reasonable future.' Thouth Sun v. Noem, 2025 U.S. Dist. LEXIS 193795, 2025 WL 2800037 at *2. Also, see the sister court in 11th Circuit in Banega v. Warden of Soft Side Sound Facility, 2026 U.S. Dist. LEXIS 16506, 2026 LX 59058, 2026 WL 234042 (U.S. Dist. Crt. Middle District Fl., Fort Myers Div.) (1/29/2026) Case # 2:25-cv-1152-JES-DNF using the Nguyen precedent along with District Courts from Arizona, Iowa, Minnesota, Nevada, Ohio, Rhoda Island, Taxes, Washington and every district of California. Also, "[a]n individual subject to a final deportation order issued by the INS or its successor agency is in custody for § 2241 purpose. Kolkevich v. Att'y Gen., 501 F.3d 323, 334 n. 6 (3rd Cir. 2007) (joining the 4th Cir. Crts.) in holding that "a final deportation order subjects an alien to a restraint on liberty sufficient to place the alien in custody." Therefore, vacated District Court order in Korac v. Fairton FCI and remanded for future proceedings.

Even considering the contrary facts in favor of the government. The government wants Samadi removed and failed to complete this task for the past 23 years of Samadi's life, created ALL sorts of injuries upon him with irreparable harms to his prior U.S.C. family. Yet, is now destroying his second marriage with young kids – ALL WHILE, yet, it is still refusing to carry-on a task in which its own mistake of losing his 'original' dependable document - "Passport" in 1984-5 – are creating all its illegal detentions and has been abusing Samadi and his families all these decades. Yet, even when Samadi is willing and repeatedly begging – by giving respondent, "the easiest option", "take me to the Mexican border, I'll walk on FOOT", respondent is refusing to carry-on its own removal process. See Exh. 1 pgs. 2-4. Therefore, it is obvious that Respondents intend to personally, emotionally, and physically abuse his family. It rather push psychological torture upon his young family than carrying on the policies of the new administration which surpasses any requirement of the deportation laws. See (DHS) Department of Homeland Security v. D.V.D. 145 S. Ct. 2153 (222 L. Ed. 1109) (2025 U.S. Lex 2487/ 93 U.S. L.W. 3355 (June 23, 2025), clarified by Department of Homeland Security v. DVD 2025 U.S. Lex 2666 (July 7, 2025), the court stated, "...by rewarding lawlessness, the court once again undermines that foundational principal."; referencing the Youngstown Sheet & Tube Co. v. Sawyer, 343 U.S. 579, 646, 72 S. Ct. 863, 96 L. Ed. 1153, 62, which on many dissents, justice Sotomayor joined by justice Kagan and Jackson, stated, "The Due Process Clause represents 'the principal that ours is a government of laws, not of men, and that we submit ourselves to rulers only if under rules.'" Youngstown Sheet & Tube Co. v. Sawyer.

and/or

Even though imprisonment (like Stewart Detention Center)/deportation is a severe punishment in a 'civil action', yet, Samadi's is willing to take this deportation to release himself and his family from the psychological torture the government is imposing on them. The Court must intervene immediately.

The sister courts in this circuit, as other federal courts jointly agree that it is not non-citizens' burden to effectuate third country removal. While Samadi has been begging ICE to take him to the Mexican border for him to cross into Mexico (to complete ICE's deportation requirements), for the past three months (Exh. 1 at 2-4); Samadi and his family have also taken their steps to end this indefinite detention nightmare via third country removal. See Affd. of Askary. In *Alverz v. Sinton*, 2009 U.S. Dist. LEXIS 137906* (U.S. Dist. Ct. Middle District of Georgia, Columbus Division), (10/30/2009) Case # 4:09-CV-89GMF. **This Court** stated, "...no where in this removal statute is the burden of effecting removal to an available country placed on the [*14] petitioner. To the Contrary, the burden by statute is placed upon the Attorney General." (footnote omitted). Yet, in this case, not only the Petitioner, but also two of his family members attempted to find a way to get this old-tired man (almost 68 years old), with young US citizen family out of detention and safe anywhere else in another neighboring countries, but have been unsuccessful because of Respondents refusal to follow its own policies.

In Samadi's case, as well as other recent Habeas petitioners, government's future argument that it is attempting to secure 3rd country assurance for his removal; its statement would be nothing but delusional as described above and by Aff. Askary. As the 3rd. Circuit said, "3rd country removal even though by itself is 'expulsion'...", the *MOHDEJIAN V. BRADFORD*, 2025 U.S. DIST. LEXIS 154931, 2025 LX 364585 (E. TX., JULY 3, 2025), court stated; "... even if respondents have secured 'blanket diplomatic assurance from third countries to which they intend to deport non-citizens, these generic commitments are insufficiently individualized, and thus insufficient under Controlling Statutory, regulatory, and international Law." Refers to *DHS v. DVD* (above).

In summary, this Honorable Court must recognize that:

"We are dealing with procedural requirements prescribed for the protection of the alien. Though deportation is not technically a criminal proceedings, it visits a great hardship on the individual and deprives him of the right to stay and live and work in this land of freedom. That deportation is a penalty - at times a most serious one - can not be doubted." *Bridge v. Wixon*, 1945, 326 U.S. 135, 154, 65 S.Ct. 1442, 1452, 89L. Ed. 2013.

PRAYER FOR RELIEF

WHEREFORE, Petitioner prays that this Court grant the following relief:

1) Assume Jurisdiction over this matter;

2) Grant Petitioner a writ of habeas corpus directing the Respondent to immediately release

Petitioner from custody on Recognition or with a bond (without undue delays) and/or under a reasonable condition of supervision or otherwise as the Court deems fit; **And**

I declare that under the penalty of perjury, the above Petition is true facts of the case, and I shall

3) Not to conclude the matter until after Respondents' remedy for release is finalized and parties report to the Court for a final decision of the Court.

testify to the accuracy of very fact contained herein.

NOTARY PUBLIC
STATE OF GEORGIA

COUNTY OF Terrell

[Signature] 04/20/26
Hamid Samadi, Affiant, Date

Notary Name: Miketaious Hallback

[Signature] 4/20/26
Signature and Date
<<SEAL>>

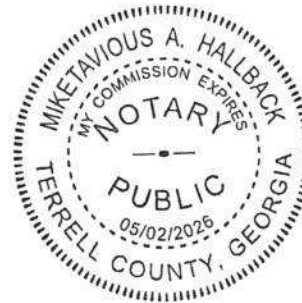
My Commission expires: 05/02/2026

Respectfully Submitted on this 20th April 2026.

[Signature]
Hamid Samadi, Petitioner



Stewart Detention Center
145 CCA Rd.
Lumpkin, GA 31815



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

Hamid Samadi A# 

Petitioner,

V.

United States Attorney General;
Secretary of Department of
Homeland Security;
Director of U.S. Immigration and Customs
Enforcement,

Respondents.

Case Number: _____

VERIFICATION

I am the pro se Petitioner, Hamid Samadi, and I am over the age of 18 (2 months short of being 68 years old), file this Emergency-Verified Petition for Bond ; and

Verify that the information contained in this Petition is TRUE and CORRECT to the best of my knowledge.

Respectfully Submitted on this 20, April 2026.



Hamid Samadi, Petitioner



Stewart Detention Center
145 CCA Rd.
Lumpkin, GA 31815

**NOTARY PUBLIC
STATE OF GEORGIA**

COUNTY OF Terrell



Hamid Samadi, Affiant, Date

Notary Name: Miketañow Hambrew



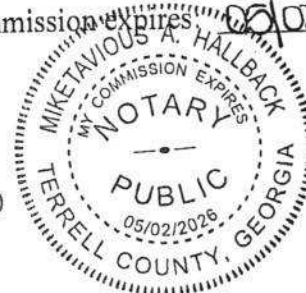
Signature and

4/20/2026
Date

<<SEAL>>

My Commission expires

05/02/2026



IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF GEORGIA
COLUMBUS DIVISION

Hamid Samadi A# 
Petitioner,

V.

United States Attorney General;
Secretary of Department of
Homeland Security;
Director of U.S. Immigration and Customs
Enforcement,

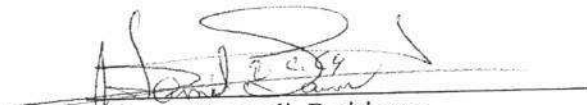
Respondents.

Case Number: _____

CERTIFICATE OF SERVICE

This is to certify that I have served the foregoing "Emergency - Verified Petition for Bond Hearing" upon the counsel for the Government by depositing the same in the United States Mail; addressed to:

U.S. Attorney's Office
P.O. Box 1702
Macon, GA 31202


Hamid Samadi, Petitioner


Stewart Detention Center
145 CCA Rd.
Lumpkin, GA 31815