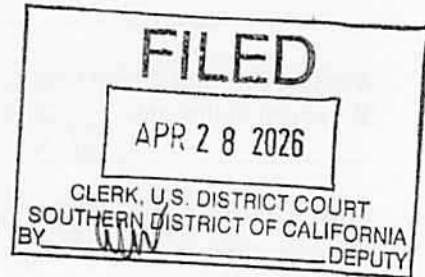


AMAH MBACHAM INNOCENT
NAME

[REDACTED]
PRISON NUMBER

IMPERIAL REGIONAL DETENTION FACILITY
PLACE OF CONFINEMENT

1572 GATEWAY RD CALEXICO CA
ADDRESS



United States District Court
Southern District Of California

Amah Mbacham Innocent
(FULL NAME OF PETITIONER)

Petitioner

v.

Jeremy Casey
(NAME OF WARDEN, SUPERINTENDENT, JAILOR, OR AUTHORIZED
PERSON HAVING CUSTODY OF PETITIONER, E.G. PAROLE OFFICER)

Respondent

and

The Attorney General of the State of
California, Additional Respondent.

Civil No. '26CV2700 RSH BJW
(TO BE FILLED IN BY CLERK OF U.S. DISTRICT COURT)

PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

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 DHS ☐ State authorities ☐ Other - explain: _____
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: _____
(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): MY Prolong detention BY immigration and
Customs Enforcement (ICE)
(d) Date of the decision or action: March 17, 2026
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: No Appeal available
I requested to be release from Detention and the
response I get back was that I will remain in custody.

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: It would have
been futile

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 have been futile

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: Statutory authority reasonable Time

(a) Supporting FACTS (state *briefly* without citing cases or law) The Time of MY Detention over 8 months Has exceeded The period Reasonably necessary to carry out removal especially Since The (BIA) appeal is still Pending.

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

☐ Yes ☒ No

GROUND TWO: I Am Entitled To Due Process under
The Fifth Amendment

(a) Supporting FACTS (state briefly without citing cases or law): It is well
settled that the Fifth entitled aliens to due
process in deportation proceedings. The due process
clause applies to all person within the USA
including aliens whether their presence here is
lawful, unlawful, temporal or permanent more than a
decade ago in the Zadvydas decision. The United States
Supreme Court signaled its concerns about the
constitutionality of a statutory scheme that
ostensibly authorized indefinite detention of
non citizens. Two years later when the court
upheld the constitutionality of 8.U.S.C. § 1226 in
the Demore decision it emphasized that for detention
under the statute to be reasonable it must be for
a brief period of time. Justice Kennedy explained in his
conurrence in the Demore decision that where there is to
be unreasonable delay by the immigration and naturalization
service in pursuing and completing deportation proceedings
it could become necessary then whether to enquire
whether the detention is not to facilitate deportation
or to protect against risk of flight or dangerous
but to incarcerate for other reasons.

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

☐ Yes ☒ No

GROUND THREE: I Am not a Flight risk or danger to
The Society

(a) Supporting FACTS (state briefly without citing cases or law): I Have a
Sponsor who is a law abiding American Citizen.
She knows me very well is willing to accomodate
and take care of my Basic needs throughout
my immigration court proceedings. He will also ensure
that i attend all my immigration court proceedings
and never Miss a court date and i promise never
to Violate any immigration court rules if Being
released From Custody.

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

☐ Yes ☒ No

GROUND FOUR: No Significant likelihood of removal From
Detention in the near Future

(a) **Supporting FACTS** (state briefly without citing cases or law): The duration of
MY current detention has been unreasonably
prolonged and there is no reason to anticipate
significant future detention during MY immigration
proceeding. MY application was denied and I have
appealed to The Board of immigration and Appeal (BIA)
and it's still pending. It could take five to six
months to be reviewed. Even if receive an
adverse decision from (BIA), I will appeal to the
ninth circuit which could continue to delay
MY removal.

The conditions of confinement has also not
been favorable MY physical and mental health has
be deteriorating. I have excruciating pain MY head
due to high blood pressure and also I have skin
allergic problem

(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:

None of these grounds were presented to any state or
federal court. Petitioner is presenting these grounds for the first to
this court.

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

N/A

(b) On appeal from any adverse ruling in a post-conviction proceeding

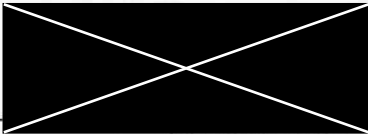
N/A

Wherefore, petitioner prays that the Court grant petitioner relief to which he may be entitled in this proceeding. *I Pray That The Court Grant Me release or in the alternative Grant Me a Bond Having in front of the immigration Judge.*

SIGNATURE OF ATTORNEY (IF ANY)

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

(DATE)



SIGNATURE OF PETITIONER