

Ayoubu Camara  
NAME

[REDACTED]  
PRISON NUMBER

Imperial Regional Detention Facility  
PLACE OF CONFINEMENT

1572 Gateway Road, Calexico, CA 92231  
ADDRESS

**FILED**  
APR 30 2026  
CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA  
BY: *[Signature]* DEPUTY

**United States District Court  
Southern District Of California**

Ayoubu Camara  
(FULL NAME OF PETITIONER)

**Petitioner**

v.

Warden 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. '26CV2782 RSH MSB  
(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     State authorities     Other - explain:

DHS/Immigration Detention

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: Imperial Immigration Court  
2409 La Brucherie Road, Imperial, CA 92251

(b) Case number, docket number or opinion number (if you know): ~~XXXXXXXXXX~~

(c) Decision or action you are challenging (for disciplinary proceedings, specify the penalties imposed): Ice Redetermination Custody

(d) Date of the decision or action: N/A

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: Neither the Immigration Court nor the BIA can consider constitutional questions and appealing my detention when they say they don't have jurisdiction

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: I did not appeal because the Judge ruled that he did not have jurisdiction

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: \_\_\_\_\_

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(b) If your answer to 7 was "No," explain why you did not appeal: I did not appeal because the Immigration Judge ruled that he did not have jurisdiction, it would be 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: I have been detained for over six (6) months, the presumed limit for unlawful detention in this circuit. In total, I have been detained for over 16 months

(a) Supporting FACTS (state *briefly* without citing cases or law) The approach adopted by the United States Court of Appeals for the Ninth circuit is to apply a bright-line rule to cases of mandatory detention where the government's statutory mandatory detention authority is limited to a six (6) months period, subject to a finding of flight risk or dangerousness. I have been detained for over 16 months as I crossed the border near Calexico on 12/20/2024 and I have been detained since then.

I have also sent a request of release to the warden and the Immigration Custody on 04/09/2026 but no responses since then (See attached Exhibit A)

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

Yes  No

GROUND TWO: I am not a fly Risk or a danger to the  
Society

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

I have a sponsor who will ensure that I will  
attend all of my Immigration Court hearings and  
is lawfully abiding citizen of the United States.  
She is my aunt who has been here for a long time.  
She is willing to accomodate me throughout my  
Immigration Court proceedings. She will take care  
of me, support me and provide all necessities if  
I have been released from custody.

(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 of the United States Constitution.

(a) Supporting FACTS (state *briefly* without citing cases or law): It is well-settled that the Fifth Amendment entitles aliens to due process in deportation proceedings. The due process clause applies to all person within the United States, including aliens, whether their presence here is lawful, unlawful, temporary 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(c) 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 concurrence in the *Demore* decision that were there to be an unreasonable delay by the Immigration and Naturalization Service in pursuing and completing deportation proceedings, it could become necessary then to inquire whether the detention is not facilitate deportation, or to protect against risks of flight or dangerousness but to incarcerate for other reasons.

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

Yes  No

**GROUND FOUR:** There is no significant likelihood of my release 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 a reason to anticipate significant future detention during my Immigration proceedings. I have been detained for over 16 months, had an adverse decision in my individual hearings (11/05/2025), filed an appeal with the BIA on the 12/05/2025 and currently awaiting of the BIA's decision. Even if I receive an adverse decision, I will appeal to the Ninth Circuit which could take over 2 years before this process comes to an end. In the meantime, I will be detained the entire time.

In addition, the conditions of my confinement have been affecting me psychologically, mentally and physically. Most of the time, I got depressed because I have been separated from my loved ones. We are restricted to outdoor spaces, forbidden to use internet and cannot connect with my family. I could not even sleep and I have been caught of the rest of the world. Suffice it to say, my detention here resembles penal confinement.

(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 time

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. Specifically petitioner seeks release from the court or alternatively a bond hearings in front of the Immigration Judge

N/A

SIGNATURE OF ATTORNEY (IF ANY)

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



04/27/2026

(DATE)

SIGNATURE OF PETITIONER



