

FILED MAY 18 2026 AM 8:14
MDGA-CDL

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

A# 
Shaneel Lakhani,

V.)

Todd Blanch, United States Attorney)
General; Markwayne Mullin,)
Secretary of Department of Homeland)
Security; David Venturella Director)
of U.S. Immigration and Customs)
Enforcement; Jason Streevell, Warden)
Of Stewart Detention Center,)

Case No.)

Respondents.

PETITION FOR WRIT OF HABEAS CORPUS 28 U.S.C. §2241

Petitioner, Shaneel Lakhani, appearing pro SE, hereby petitions this Court for a **writ of Habeas Corpus** and seeks declaratory and injunction relief to review the lawfulness of this detention by the United States Department of Homeland Security, Immigration and Customs Enforcement (ICE) for more than six months because ICE has been unable to obtain the travel documents necessary to deport him to Pakistan. In support of this Petition and Complaint, petitioner alleges as follows:

CUSTODY

1. Petitioner is in the physical custody of respondents and detained at the Stewart Detention Center in Lumpkin, GA, pursuant to a contractual agreement with the Department of Homeland Security.

JURISDICTION

2. This action arises under the United States Constitution, the Immigration and Nationality Act of 1952, as amended, 8 U.S.C. 1101 et seq. (the Act), and the Administrative Procedure Act, 5 U.S.C. 701 et seq. (the APA).

3. Jurisdiction exists in this Court pursuant to 28 U.S.C 2241 et seq., 28 U.S.C 1331, the APA,

5 U.S.C et seq., the Declaratory Judgment Act, 28 U.S.C. et seq., and the All Writs Acts, 28 U.S.C. 1361.

4. Petitioner has exhausted any and all administrative remedies to the extent required by law.

VENUE

5. Pursuant to *Braden v. 30th Judicial Circuit court of Kentucky*, 410 U.S 484, 493-500 (1973), venue lies in the United States District of Georgia, the Judicial District in which petitioner is currently detained.

PARTIES

6. Petitioner is a native and citizen of Pakistan. Petitioner was first taken into the respondents custody on June 18th 2024 and has remained in their custody continuously since that date.
7. Respondent-defendant **Todd Blanche**, United States Attorney General; Markwayne Mullin, Acting Secretary of Department of Homeland Security; **David Venturella**, Acting Director of U.S. Immigration and Customs Enforcement; Jason Streevell, Warden of Stewart Detention Center.

FACTS

8. Petitioner, Shaneel Lakhani, is a native and citizen of Pakistan.
9. Petitioner first entered the United States on May 1st 1989.
10. Received his Lawful Permanent Residence in 1999.
11. An Immigration Judge ordered the petitioner removed on April 25th 2025 on the grounds that he is removable because he is an aggravated felon.
12. Petitioner filled out a deportation application for Pakistan on May 30th 2025

13. Petitioner was taken into custody by ICE on June 18th 2024 and has been in the custody of ICE for more than six months since his removal/deportation exclusion order became final.
14. Petitioner has cooperated fully with all efforts by ICE to remove petitioner from the United States.
15. To date, however, ICE has been unable to remove petitioner to Pakistan or any other country.
16. Petitioner's 180 day Custody Review by the Department of Homeland Security Headquarters Post-Order Detention Unit (HQCDU) in Washington, D.C. was conducted on or about March 2026.
17. Petitioner had an interview with ICE on April 24 2026. They didn't Conduct it. Subsequent efforts by the Petitioner to find out when the interview would be conducted were replied by ICE saying "Your officer will conduct it today or next week"
18. There have been no disciplinary issues at all in ICE custody.

19. If released, petitioner will reside at: 316 main st lot 64
Auburn Ga, 30011

17. Additionally,

Pakistan cannot verify citizenship

Government not able to provide travel documents.

I have a son living at the same address who needs me I am not a risk to society. I just want to be there for my kids.

Please give me a Chance to show my children that I love them and can be there for them.

I will continue to try and get travel documents to leave because I am afraid to be locked up in ICE custody again. This experience to be deported has been a nightmare.

My initial arrest was on March 28 2024. I have been incarcerated for Twenty Six months.

My Probation completed April 24 2026.

When I was divorced in 2018 my life took on a downward spiral that culminated in my initial January 2021 arrest

I have been free for only 5 months and 19 days since January 21st 2021

I have learned my lesson

I will be living with Louis McCallister and James Knight

Phone # 

COUNT ONE

(Detention in violation of the Statute and Regulations)

18. Petitioner repeats and re-alleges the allegations contained in paragraphs 1 through 17 above as though set forth fully herein.

19. Section 241 of the Immigration and nationality Act permits the detention of an alien with a final order of removal for a period of 90 days. Beyond the statutory period, the Supreme Court has held that six months is a presumptive reasonable period of detention for the government to effect removal. Zadvydas v. Davis, 533 U.S. 678, 701 (2001). Once six months have passed, the alien must be released if there is no reasonable likelihood of removal in the reasonably foreseeable future. Zadvydas v. Davis, 533 U.S. 699, 700. In this case, ICE has detained petitioner for more than six months since the issuance of his final order of removal.

19. No special circumstances exist to justify petitioners continued detention:

A. Petitioner is not an alien with a highly contagious disease posing a danger to the public. See 8 C.F.R. 241.14(b).

B. Petitioner release would not cause serious adverse foreign policy consequences. See 8 C.F.R. 241.14 (c)(1)(ii). There is no indication that petitioners release would have serious adverse foreign policy consequences.

C. Petitioner was never and is now detained on account of security or terrorism concerns. See 8 C.F.R. 241.14(d)(1).

D. Petitioner has not committed a violent crime as defined in 18 U.S.C. 16 as would classify him as specially dangerous. See. 8 C.F.R. 241.14(f)(1). His release therefore would not pose a special danger to the public. See 8 C.F.R. 241.14(f) See Conviction Record

20. Because there is no significant likelihood of removal in the reasonably foreseeable future, and because none of the special circumstances exist here to justify petitioners continued detention, petitioner must be released under ICE supervision.

COUNT TWO

(Substantive Due Process Violation)

21. Petitioner repeats and re-alleges the allegations set forth in paragraphs 1 through 18 as though set forth fully herein.

22. As a person in the United States, petitioner is protected by the due process Clause of the Fifth Amendment. ICE has detained petitioner for more than six months since the issuance of his final order of removal. There is no significant likelihood that petitioners removal will occur in the reasonably foreseeable future. Petitioner does not pose a danger to the community or a risk for flight, and no special circumstances exist to justify his continued detention. As Petitioner is not dangerous, not a flight risk, and cannot be removed, his indefinite detention is not justified and violates substantive due process. See Zadvydas, 533 U.S. at 690-91.

PRAYER FOR RELIEF

WHEREFORE, petitioner prays that this Honorable Court to grant the following relief:

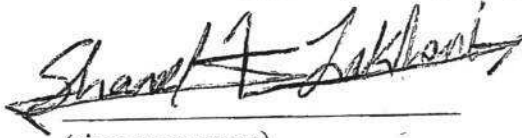
1. Issue an Order

A. Declaring that petitioner continued detention is not authorized by the DHS and/or violates the Fifth Amendment;

B. Granting this petition for a writ of Habeas Corpus and releasing petitioner under an order of supervision;

2. Grant any other and further relief this court may deem appropriate.

I affirm, under penalty of perjury, that the foregoing is true and correct.



(sign your name)

Petitioner

Shaneel Lakhani

petitioners name

(today's date)



(alien number)

146 CCA Road
(use these two lines to write your mailing address)
Lumpkin, GA, 31815

PUBLIC NOTARY

(SEAL)

SIGNATURE

CERTIFICATE OF SERVICE

I, _____ hereby certify that on _____ a copy of this

Petition for Writ Habeas Corpus

which it was send via priority mail to:

- 1, United States District Court
For the Middle District of Georgia
Columbus Division
P.O. Box 124
Columbus, GA, 31902

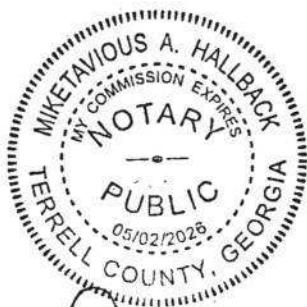
And placed a copy of this

petition for Writ Habeas Corpus

in the proper ICE Drop Box

- 2, United States Attorney
Stewart Detention Center
146 CCA Road
Lumpkin, GA, 31815

Therefore under the "Mailbox Rule", the date a prisoner/detainee delivers a copy of a petition or other filing document to the detention authorities for mailing is considered to be the date filing with the Court. See Washington v. United States, 243 f. 3d 1299, 1301 (11th cir. 2011)



m. Hallback
5/11/2026

Shaneel Lakhani;
A# ~~XXXXXXXXXX~~
Stewart Detention Center
146 CCA Road
Lumpkin, GA, 31815