

**UNITED STATES DISTRICT COURT**  
for the

JUL 10 2026

CLERK U.S. DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
BY \_\_\_\_\_  
DEPUTY CLERK*Laguerre Odson*  
Petitioner

Warden Central Valley Annex

Detention McFarland CA 93250  
Respondent

(name of warden or authorized person having custody of petitioner)

1:26 CV 05333 KES CDB  
Case No. \_\_\_\_\_  
(Supplied by Clerk of Court) (HC)**PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241****Personal Information**

1. (a) Your full name: *Laguerre Odson*  
(b) Other names you have used: *NA*
2. Place of confinement:  
(a) Name of institution: *Central Valley Annex*  
(b) Address: *254 Taylor Ave McFarland CA 93250*
- (c) Your identification number: 
3. Are you currently being held on orders by:  
☒ Federal authorities    ☐ State authorities    ☐ Other - explain: \_\_\_\_\_
4. 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: *NA*  
(b) Docket number of criminal case: *NA*  
(c) Date of sentencing: *NA*  
☒ Being held on an immigration charge  
☐ Other (explain): \_\_\_\_\_

**Decision or Action You Are Challenging**

5. What are you challenging in this petition:  
☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

- ☐ Pretrial detention  
☒ Immigration detention  
☐ Detainer  
☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)  
☐ Disciplinary proceedings  
☐ Other (explain): \_\_\_\_\_

## 6. Provide more information about the decision or action you are challenging:

(a) Name and location of the agency or court: Central Valley Annex254 Taylor Ave McFarland, CA 93250(b) Docket number, case number, or opinion number: [REDACTED]

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

Violation Due - Process(d) Date of the decision or action: April 7-2026

## Your Earlier Challenges of the Decision or Action

## 7. First appeal

Did you appeal the decision, file a grievance, or seek an administrative remedy?

☐ Yes ☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: NA(2) Date of filing: NA

(3) Docket number, case number, or opinion number: \_\_\_\_\_

(4) Result: NA(5) Date of result: NA(6) Issues raised: NA(b) If you answered "No," explain why you did not appeal: NA

## 8. Second appeal

After the first appeal, did you file a second appeal to a higher authority, agency, or court?

☐ Yes ☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: NA(2) Date of filing: NA(3) Docket number, case number, or opinion number: NA(4) Result: NA(5) Date of result: NA(6) Issues raised: NA*Did not Appeal*

(b) If you answered "No," explain why you did not file a second appeal:

NA9. **Third appeal**

After the second appeal, did you file a third appeal to a higher authority, agency, or court?

☐ Yes☒ No

(a) If "Yes," provide:

(1) Name of the authority, agency, or court: NA(2) Date of filing: NA(3) Docket number, case number, or opinion number: NA(4) Result: NA(5) Date of result: NA(6) Issues raised: NA*Did not Appeal*

(b) If you answered "No," explain why you did not file a third appeal:

NA10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes☒ No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☐ Yes☒ No

AO 242 (Rev. 09/17) Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241

If "Yes," provide:

- (1) Name of court: NA
- (2) Case number: NA
- (3) Date of filing: NA
- (4) Result: NA
- (5) Date of result: NA
- (6) Issues raised: NA

- (b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes ☒ No

If "Yes," provide:

- (1) Name of court: NA
- (2) Case number: NA
- (3) Date of filing: NA
- (4) Result: NA
- (5) Date of result: NA
- (6) Issues raised: NA

- (c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence:

NADid not appeal

# 11. Appeals of immigration proceedings

Does this case concern immigration proceedings?

☒ Yes ☐ No

If "Yes," provide:

- (a) Date you were taken into immigration custody: April 7-2026
- (b) Date of the removal or reinstatement order: Proceeding
- (c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes ☒ No

If "Yes," provide:

(1) Date of filing: NA(2) Case number: NA(3) Result: NA(4) Date of result: NA(5) Issues raised: NA

(d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes ☒ No

If "Yes," provide:

(1) Name of court: NA(2) Date of filing: NA(3) Case number: NA(4) Result: NA(5) Date of result: NA(6) Issues raised: NO

## 12. Other appeals

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☐ Yes ☒ No

If "Yes," provide:

(a) Kind of petition, motion, or application: NA(b) Name of the authority, agency, or court: NA(c) Date of filing: NA(d) Docket number, case number, or opinion number: NA(e) Result: NA(f) Date of result: NA(g) Issues raised: NA

**Grounds for Your Challenge in This Petition**

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground. Any legal arguments must be submitted in a separate memorandum.

**GROUND ONE:** *Violation of the Accardi Doctrine governing detention:*

*This regulation requires at a minimum that agency conducts timely, carefully review, provides written notice of determination and allow the detainee to submit evidence and arguments.*

(a) Supporting facts (Be brief. Do not cite cases or law.):

*Agency failed to comply with its mandatory regulatory obligation;*

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

☐ Yes

☒ No

**GROUND TWO:** *Violation of Due Process, presumption over the 6 months*

(a) Supporting facts (Be brief. Do not cite cases or law.):

*Under the 5th Amendment detention must comport with fundamental governing post-removal order detention including 8 C.F.R. § 24.4 require timely custody review with notice of custody determination;*

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

☐ Yes

☒ No

**GROUND THREE:**

*NA*

(a) Supporting facts (Be brief. Do not cite cases or law.):

*NA*

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

☐ Yes

☒ No

**GROUND FOUR:** *Arbitrary and Indefinite detention without individualized determination or legitimate government purposes.*

(a) Supporting facts (Be brief. Do not cite cases or law.):

*Custody determination or explanation for continued detention, making the detention punitive rather than regulatory. Because ICE has failed to conduct any individualized determination or demonstrate a valid purpose, which is unconstitutional.*

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

☐ Yes

☒ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not:

*Did not Appeal*

#### Request for Relief

15. State exactly what you want the court to do: *Wherefore, Petitioner respectfully request the Court-*

- 1. Assume Jurisdiction over this matter*
- 2. Grant the Petition for Writ of Habeas Corpus*
- 3. Order Petitioner immediate release under reasonable Condition of Supervision*
- 4. Alternatively Order Respondents to show immediate Cause why Petitioner not be release.*
- 5. Grant any additional relief this Court deems just and proper.*

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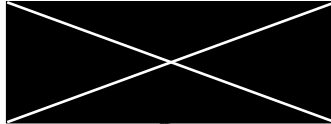
**Declaration Under Penalty Of Perjury**

If you are incarcerated, on what date did you place this petition in the prison mail system:

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I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: July 06 - 2026



\_\_\_\_\_  
*Signature of Petitioner*

NA  
*Signature of Attorney or other authorized person, if any*

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

Laguerra, Odson  
Plaintiff/Petitioner

v. Warden Central Valley

Case Number:

Detention, McFarland CA, 93250  
Defendant/Respondent(s)

PROOF OF SERVICE

"DHS"

I hereby certify that on July 06-2026, I served a copy  
of the attached Proof of Service, Notice of change of address, Application Habeas Corpus

by placing a copy in a postage paid envelope addressed to the person(s) hereinafter

listed, by depositing said envelope in the United States Mail at  
Central Valley And  
254 Taylor Ave, McFarland CA 93250

(List Name and Address of each Defendant or Attorney Served)

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



(Signature of Person Completing Service)