

Thomas Evans
GA Bar Number: 305649
Kuck Baxter LLC
365 Northridge Road, Suite 300
Atlanta, GA 30350
Phone: 404-949-8176
Fax: 404-816-8615
tevens@immigration.net

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
WAYCROSS DIVISION**

Jean Sylvain Ngatcham TCHAMAMBE, Case No.

Petitioner,

Warden, Robert A Deyton Detention
Facility; LaDeon FRANCIS, Field
Office Director, Atlanta Field Office,
United States Immigration and Customs
Enforcement; Todd M. LYONS, Acting
Director, United States Immigration and
Customs Enforcement; Markwayne
MULLIN, Secretary of Homeland
Security; Todd BLANCHE, Acting
United States Attorney General, *in their
official capacities,*

Respondents.

**PETITION FOR A WRIT OF
HABEAS CORPUS AND
INJUNCTIVE RELIEF**

INTRODUCTION

1. This case challenges the unlawful re-detention of Jean Sylvain Ngatcham Tchamambe (“Petitioner” or “Mr. Tchamambe”) (A , who is currently in the custody of United States Immigration and Customs Enforcement (“ICE”), at the Robert A Deyton Detention Facility in Lovejoy, Georgia.

2. In August 2025, ICE detained Mr. Tchamambe without complying with the regulations governing his release on an Order of Supervision (“OSUP”). *See* 8 C.F.R. § 241.13(i). Upon his detention, an immigration official simply stated, “You know why,” and detained him without following the proper regulations. He remains detained since that date.

3. Mr. Tchamambe’s removal to Cameroon is not reasonably foreseeable. ICE has not obtained a travel document from Cameroon, and ICE has previously failed to deport him in the past because all his identity documents were stolen in 2002. To counsel’s knowledge, ICE has twice attempted to board Mr. Tchamambe on a plane to Cameroon but has failed to do so.

4. The punitive, unlawful detention of Mr. Tchamambe violates the Due Process Clause of the Fifth Amendment of the U.S. Constitution, the Immigration and Nationality Act, 8 U.S.C. § 1231, implementing regulations, 8 C.F.R. § 241.4, 241.13. *See Zadvydas v. Davis*, 533 U.S. 678, 689-90, 121 S. Ct. 2491 (2001).

5. Mr. Tchamambe respectfully requests this Court to issue an order directing Respondents to immediately release him from custody and restore him to the status he held prior to his re-detention, including the same conditions of his supervised release.

PARTIES

6. Petitioner, Mr. Tchamambe, has lived in the United States since 2002. He is currently detained in Lovejoy, Georgia.

7. Respondent Warden of Robert A Deyton Detention Facility is the warden of the facility where Petitioner is currently detained. He is a legal custodian of Petitioner and is named in his official capacity.

8. Respondent LaDeon Francis is the Field Office Director responsible for the Atlanta Field Office of ICE with administrative jurisdiction over Petitioner's immigration case. He is a legal custodian of Petitioner and is named in his official capacity.

9. Respondent Todd M. Lyons is the Acting Director of ICE. He is a legal custodian of Petitioner and is named in his official capacity.

10. Respondent Markwayne Mullin is the Secretary of the United States Department of Homeland Security (DHS). He is a legal custodian of Petitioner and is named in his official capacity.

11. Respondent Todd Blanche is the Acting Attorney General of the United States Department of Justice. He is a legal custodian of Petitioner and is named in his official capacity.

JURISDICTION AND VENUE

12. This Court has subject matter jurisdiction under 28 U.S.C. § 2241, the Suspension Clause of the Constitution, and 28 U.S.C. § 1331 because this action arises under federal law, including the Immigration and Nationality Act, 8 U.S.C. § 1101, *et seq.*, and Administrative Procedure Act, 5 U.S.C. § 551, *et seq.*

13. Venue is proper in this district because Mr. Tchamambe is in the custody of Respondent at the Robert A Deyton Detention Facility, which is located within this District.

STATEMENT OF FACTS AND PROCEDURAL HISTORY

A. Petitioner: Jean Sylvain Ngatcham Tchamambe

14. Mr. Tchamambe was born in Cameroon on 

15. In 2002, he entered the United States lawfully on a B2 tourist visa. Exhibit A, Copy of Notice to Appear. Mr. Tchamambe applied for asylum with USCIS and then the immigration court. In January 2006, he received a removal order for failure to appear to his hearing due to illness. He filed a motion to reopen his removal proceedings, which was granted, but he failed to appear again at a hearing on May 30, 2006, due to transportation issues. Exhibit B, January 14, 2026, Order Denying Motion to Reopen. Mr. Tchamambe has filed several motions to reopen his proceedings since then, all of which have been denied. *Id.*

16. Mr. Tchamambe is a dialysis patient due to kidney failure.

17. Mr. Tchamambe is married to his U.S. citizen wife, and he has two U.S. citizen children. He is the beneficiary of an approved I-130, Petition for Alien Relative. Exhibit C, Family Biographical Documents.

18. Mr. Tchamambe was previously detained in 2008 in an attempt to execute his removal order. However, because he was previously robbed of his identity documents showing proof of his Cameroonian citizenship in 2002, ICE was not able to execute his removal order.

19. Mr. Tchamambe has been on an Order of Supervision (“OSUP”) ever since, allowing him to work lawfully in the United States. Exhibit D, Order of Supervision.

20. On August 28, 2025, Mr. Tchamambe was detained at a routine ICE check-in. Upon his detention, Mr. Tchamambe was not provided notice or a chance to respond to his detention. The only thing an officer told Mr. Tchamambe regarding his detention was the short statement: “You know why.”

21. To counsel’s knowledge, ICE has made no effort to obtain travel documents to execute Mr. Tchamambe’s removal order, nor is it likely that they can because they have previously tried and failed because of Mr. Tchamambe’s lack of documents evidencing his Cameroonian citizenship. There is no evidence that Cameroon has issued a travel document or would accept Mr. Tchamambe’s repatriation.

22. There are no circumstances indicating that Mr. Tchamambe now poses a flight risk or danger to the community. He has a clear pathway to status in the United States, he has severe health conditions, and he has a U.S. citizen wife and children. To counsel's knowledge, Mr. Tchamambe's criminal history does not include violent crimes that would preclude him from obtaining permanent residence in the United States or that would make him a danger to the community.

23. Mr. Tchamambe was recently moved the Robert A Deyton Detention Facility. Exhibit E, Screenshot of ICE Detainee Locator.

LEGAL BACKGROUND

A. Due Process Governs Decisions to Revoke an Order of Supervision

24. "The Due Process Clause applies to all persons within the United States, including aliens, whether their presence here is lawful, unlawful, temporary, or permanent." *Zadvydas*, 533 U.S. at 693.

25. "Freedom from imprisonment—from government custody, detention, or other forms of physical restraint—lies at the heart of the liberty that Clause protects." *Id.* at 690 (2001).

26. Under substantive due process doctrine, revocation of a noncitizen's order of supervision is a restraint on liberty that is permissible only permissible if it serves a "legitimate nonpunitive objective." *Kansas v. Hendricks*, 521 U.S. 346, 363 (1997).

27. The Supreme Court has only recognized two legitimate objectives of immigration detention; preventing danger to the community or preventing flight prior to removal. *See Zadvydas*, 533 U.S. at 690-92 (discussing constitutional limitations on civil detention).

28. “Procedural due process imposes constraints on governmental decisions which deprive individuals of liberty,” like the decision to revoke a non-citizen’s order of supervision. *Mathews v. Eldridge*, 424 U.S. 319, 332 (1976) (citation modified). “The fundamental requirement of [procedural] due process is the opportunity to be heard at a meaningful time and in a meaningful manner.” *Id.* at 333 (citation modified).

B. Procedure for Revoking an Order of Supervision

29. A noncitizen with a final order of removal “who is not removed within the [90-day] removal period . . . shall be subject to [an order of] supervision under regulations prescribed by the Attorney General.” 8 U.S.C. § 1231(a)(3) (titled “Supervision after 90-day period”).

30. A noncitizen may only be detained past the 90-day removal period following a removal order if found to be “a risk to the community or unlikely to comply with the order of removal” or if the order of removal was on specified grounds. *Id.* § 1231(a)(6).

31. But even where initial detention past the 90-day removal period is authorized, if “removal is not reasonably foreseeable, the court should hold continued detention unreasonable and no longer authorized by [§ 1231(a)(6)]. In that case, of course, the alien’s release may and should be conditioned on any of the various forms of supervised release that are appropriate in the circumstances” *Zadvydas*, 533 U.S. at 699-700.

32. Regulations provide the following additional circumstances, beyond those listed at § 1231(a)(6), that allow for the revocation of an order of supervision and re-detention of a non-citizen: “(1) the purposes of release have been served; (2) the alien violates any condition of release; (3) it is appropriate to enforce a removal order . . . ; or (4) the conduct of the alien, or any other circumstance, indicates that release would no longer be appropriate.” 8 C.F.R. § 241.4(l)(2); *see also id.* § 241.13(i) (permitting revocation of an order of supervision only if a non-citizen “violates any of the conditions of release”).

33. Because “[r]egulations cannot circumvent the plain text of the statute[,]” these regulations are *ultra vires* of statutory authority. *See, e.g., You v. Nielsen*, 321 F. Supp. 3d. 451, 463 (S.D.N.Y. 2018) (comparing regulations to § U.S.C. § 1231(a)(6), which authorizes detention past the removal period only if person is a risk to the community, unlikely to comply with the order of removal, or was ordered removed on specified grounds).

34. The governing regulations permit only certain officials to revoke an order of supervision: the ICE Executive Associate Director, a field office director, or an official “delegated the function or authority . . . for a particular geographic district, region, or area.” *Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 161 (W.D.N.Y. 2025) (citing 8 C.F.R. §§ 1.2, 241.4(l)(2) and explaining that the Homeland Security Act of 2002 renamed the position titles listed in § 241.4). If the field office director or a delegated official intends to revoke an order of supervision, they must first make findings that “revocation is in the public interest and circumstances do not reasonably permit referral of the case to the Executive Associate [Director].” 8 C.F.R. § 241.4(l)(2). For a delegated official to have authority to revoke an order of supervision, the delegation order must explicitly say so. *See Ceesay v. Kurzdorfer*, 781 F. Supp. 3d 137, 161 (finding a delegation order that “refers only to a limited set of powers under part 241 that do not include the power to revoke release” insufficient to grant authority to revoke an order of supervision).

35. Upon revocation of an order of supervision, ICE must give a noncitizen notice of the reasons for revocation and a prompt interview to respond. 8 C.F.R. §§ 241.4(l)(1), 214.13(i). “Upon revocation, the alien will be notified of the reasons for revocation of his or her release or parole.” *Id.* § 214.13(l)(1); *see also id.* § 214.13(i)(3). “The alien will be afforded an initial informal interview promptly after her or her return to Service custody to afford the alien an opportunity

to respond to the reasons for revocation stated in the notification.” *Id.* § 214.13(l)(1); *see also id.* § 214.13(i)(3).

C. The APA Sets Minimum Standards for Final Agency Action

36. The Administrative Procedure Act authorizes judicial review of final agency action. 5 U.S.C. § 704.

37. Final agency actions are those (1) that “mark the consummation of the agency’s decision making process[,]” and (2) “by which rights or obligations have been determined, or from which legal consequences will flow.” *Bennett v. Spear*, 520 U.S. 154, 178 (1997) (citation modified).

38. ICE’s decision to re-detain Mr. Tchamambe, without revoking his OSUP and without any notice, is a final agency action subject to this Court’s review.

39. Here, Mr. Tchamambe’s re-detention marked the consummation of ICE’s decision making process regarding Mr. Tchamambe’s custody.

40. Mr. Tchamambe’s re-detention was an action by which rights or obligations have been determined or from which legal consequences flowed, as ICE detained Mr. Tchamambe in violation of his rights under the Constitution, statute, and regulations.

D. Agencies Must Follow Lawful Rules And Policy

41. Under the *Accardi* doctrine, a foundational principle of administrative law, agencies must follow their own procedures, rules, and instructions. See *United*

States ex rel. Accardi v. Shaughnessy, 347 U.S. 260, 268 (1954) (setting aside an order of deportation where the Board of Immigration Appeals failed to follow procedures governing deportation proceedings); *see also Morton v. Ruiz*, 415 U.S. 199, 235 (1974) (“Where the rights of individuals are affected, it is incumbent upon agencies to follow their own procedures . . . even where the internal procedures are possibly more rigorous than otherwise would be required.”).

42. Where a release notification issued alongside an order of supervision instructs that a noncitizen with a final order of removal will be given an opportunity to prepare for an “orderly departure,” ICE’s failure to follow that instruction is an *Accardi* violation. *See Ceesay*, 781 F. Supp. 3d at 169; *Ragbir v. Sessions*, 2018 WL 623557 (S.D.N.Y. Jan. 29, 2018), *vacated and remanded on other grounds sub nom. Ragbir v. Barr*, 2019 WL 6826008 (2d Cir. July 30, 2019); *Rombot v. Souza*, 296 F. Supp. 3d 383 (D. Mass. 2017) (ordering release of petitioners to give an opportunity to prepare for orderly departure).

43. Many district courts have confronted the same question presented here -- that is, whether ICE’s violation of the procedural requirements set forth in § 241.13 may be overlooked in a habeas action challenging the legality of a noncitizen’s detention -- and concluded that habeas relief was warranted. *See, e.g., Phan v. Noem*, 2025 WL 2898977, *5 (S.D. Cal. 2025) (“The Court’s research indicates that every district court, except one, to consider the issue has determined

that where ICE fails to follow its own regulations in revoking release, the detention is unlawful, and the petitioner's release must be ordered. This Court reaches the same conclusion. ICE's failure to comply with both 8 C.F.R. § 241.4 and 8 C.F.R. § 241.13 violated Petitioner's due process rights."); *Nguyen v. Archambeault*, 2025 WL 3250922, *1-2 (D. Ariz. 2025) ("Respondents implicitly acknowledge their noncompliance with the regulation that required ICE to provide notice and conduct the informal interview promptly after Petitioner's redetention. That requirement is not an abstract procedural technicality Respondents' failure to comply with the governing regulation is prejudicial in that, if the regulation had been followed, Petitioner would have had a meaningful timely opportunity to no longer be detained. The delay of over four months deprived Petitioner of the opportunity to challenge the reasons for his redetention. Petitioner's immediate release is required to return him to the status quo ante—the last uncontested status which preceded the pending controversy. This decision is in accord with myriad other district courts to address this issue.") (citations omitted); *accord see also Grigorian v. Bondi*, 2025 WL 2604573, *9-10 (S.D. Fla. 2025).

E. Post-Removal Order Detention Under § 1231

44. Even if Respondents properly followed the requirements to revoke Mr. Tchamambe's OSUP, Respondents are indefinitely detaining Mr. Tchamambe in violation of 8 U.S.C. § 1231 and the Supreme Court's decision in *Zadvydas*.

45. Under 8 U.S.C. § 1231(a), detention is only mandatory during an initial ninety-day “removal period.” 8 U.S.C. § 1231(a). The removal period begins on the latest of (1) the date the order of removal becomes administratively final; (2) “[i]f the removal order is judicially reviewed and if a court orders a stay of the removal of the alien, the date of the court’s final order”; and (3) “[i]f the alien is detained or confined (except under an immigration process), the date the alien is released from detention or confinement.” *Id.* § 1231(a)(1)(B).

46. After the ninety-day removal period, detention is no longer mandatory, and the individual should generally be released under conditions of supervision, such as periodic reporting. *See id.* § 1231(a)(3); *id.* § 1231(a)(6) (stating that certain removable non-citizens “may be detained beyond the removal period” if they are determined “to be a risk to the community or unlikely to comply with the order of removal”); 8 C.F.R. § 241.4 (detailing criteria and procedures for release of individuals detained beyond the removal period who do not pose a threat to the community or a significant flight risk).

47. The ninety-day removal period may be expended if the individual “fails or refuses to make timely application in good faith for travel or other documents necessary to his departure or conspires or acts to prevent his removal.” 8 U.S.C. § 1231(a)(1)(C). In these circumstances, ICE is required to serve the individual with a Notice of Failure to Comply, advising him that the removal period

has been extended and explaining the steps he must take to demonstrate compliance. 8 C.F.R. § 241.4(g)(5)(ii).

48. Under *Zadvydas*, there is a “presumptively reasonable period of detention” of six months, including the ninety-day removal period. 533 U.S. at 801. “After this 6-month period, once the [petitioner] provides good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future, the Government must respond with evidence sufficient to rebut the showing.” *Id.* At that point, the government must release the individual unless it can show some “sufficiently strong special justification” for continuing his detention. *Id.* at 690-91, 701.

49. A habeas petitioner is not required to show that his removal is “impossible,” only unlikely. *Id.* at 702. A mere claim by Respondents that “good faith efforts to effectuate . . . deportation continue” is not sufficient to justify continued detention after six months. *Id.* “[A]s the period of prior postremoval confinement grows, what counts as the ‘reasonably foreseeable future’ conversely would have to shrink.” *Id.* at 701.

50. An individual may state a claim under *Zadvydas* upon a showing “(1) that the six-month period, which commences at the beginning of the statutory removal period, has expired when the § 2241 petition is filed; and (2) ‘evidence of a good reason to believe that there is no significant likelihood of removal in the

reasonably foreseeable future.” *Gozo v. Napolitano*, 309 F. App’x 344, 346 (11th Cir. 2009) (quotation marks omitted). This Court has suggested that the period does not start until the individual’s re-detention.

51. Release is the proper remedy for unconstitutionally prolonged post-removal detention. *See Zadvydas*, 533 U.S. at 699-700 (explaining that supervised release is the appropriate relief when “the detention in question exceeds a period reasonably necessary to secure removal” because at that point, detention is “no longer authorized by statute”).

CLAIMS FOR RELIEF

Count One

Violation of the Fifth Amendment of the U.S. Constitution Substantive Due Process

52. Petitioner realleges all paragraphs above as if fully set forth here.

53. The Due Process Clause of the Fifth Amendment protects against punitive detention and similar restrictions on a person’s liberty.

54. On September 19, 2008, ICE released Mr. Tchamambe on an OSUP.

55. For the past 17 years, Mr. Tchamambe has complied with all terms and conditions of his OSUP.

56. No change in circumstances and no OSUP violation warranted Mr. Tchamambe’s re-detention in August 2025.

57. Mr. Tchamambe's arrest and re-detention, therefore, did not bear a reasonable relationship to the two recognized purposes of immigration detention: preventing danger to the community, or flight prior to removal.

58. Because ICE had no legitimate, non-punitive objective in revoking Mr. Tchamambe's order of supervision, his re-detention violates substantive due process under the Fifth Amendment of the U.S. Constitution.

Count Two
Violation of the Fifth Amendment of the U.S. Constitution
Procedural Due Process

59. Petitioner realleges all paragraphs above as if fully set forth here.

60. The Supreme Court's decision in *Mathews*, 424 U.S. at 333, instructs courts to balance three factors to determine whether procedural due process is satisfied: (1) the private interest at issue; (2) the risk of erroneous deprivation of that interest through the procedures used, and the probable value, if any, of additional procedural safeguards; and (3) the government's interest, including fiscal and administrative burdens that additional or substitute procedural requirements entail.

61. All three factors demonstrate ICE violated Mr. Tchamambe's rights to due process.

62. The first factor, the private interest at issue, favors Mr. Tchamambe. "Freedom from imprisonment—from government custody, detention, or other

forms of physical restraint—lies at the heart of the liberty that [the Due Process] Clause [of the Fifth Amendment] protects.” *Zadvydas*, 533 U.S. at 690.

63. The second factor, the risk of erroneous deprivation of liberty and the probable value of procedural safeguards, favors Mr. Tchamambe.

64. To safeguard against erroneous deprivations of liberty, the statute specifies the limited number of reasons that an order of supervision can be revoked. Regulations specify who may lawfully revoke the order, and the procedures that must be followed when doing so, including giving notice and an opportunity to be heard. 8 U.S.C. § 1231(a)(6); 8 C.F.R. § 241.13(i).

65. Here, ICE detained Mr. Tchamambe in violation of his procedural due process protections under the statute, regulations, and the Fifth Amendment. The failure to follow the requisite regulations and procedural safeguards has led to the deprivation of Mr. Tchamambe’s liberty by Respondents.

66. When the government ignores law that ensures notice and an opportunity to respond to a person at risk of revocation of an order of supervision, it is more likely to waste limited financial and administrative resources on unnecessary detention of people who are neither flight risks nor dangerous to the community, as is the case with Mr. Tchamambe.

67. The re-detention of Mr. Tchamambe, prior to the revocation of his OSUP and without providing him requisite notice and a meaningful opportunity to

respond in compliance with the regulations, violated his procedural due process rights under the Fifth Amendment of the U.S. Constitution.

Count Three
Detention In Violation of Law

68. Petitioner realleges all paragraphs above as if fully set forth here.

69. Under the APA, a court shall “hold unlawful and set aside agency action . . . found to be . . . not in accordance with law” or “contrary to constitutional right, power, privilege, or immunity.” 5 U.S.C. § 706(2)(A), (B).

70. The APA’s reference to “law” in the phrase “not in accordance with law,” “means, of course, *any* law, and not merely those laws that the agency itself is charged with administering.” *FCC v. NextWave Pers. Commc’ns Inc.*, 537 U.S. 293, 300 (2003) (emphasis in original).

71. ICE failed to comply with both 8 C.F.R. § 241.4 and 8 C.F.R. § 241.13 at the time of Mr. Tchamambe’s re-detention.

72. ICE never revoked Mr. Tchamambe’s OSUP prior to taking him into custody nor provided him with the requisite notice or interview at the time of his detention nor an interview.

73. ICE’s re-detention of Mr. Tchamambe and transfer to Respondents’ custody violated the governing regulations.

74. ICE's decision to arrest, re-detain, and transfer Mr. Tchamambe into Respondents' custody was not made in accordance with law and procedure, and thus Respondents must release him from custody.

Count Four
Violation of the Immigration and Nationality Act: Indefinite Detention
Beyond Removal Period

75. Petitioner realleges and all paragraphs above as if fully set forth here.

76. While interpreting 8 U.S.C. § 1231(a)(6), the Supreme Court has held that detention after a final order of removal is permitted only for "a period reasonably necessary to bring about the alien's removal from the United States." *Zadvydas*, 533 U.S. 689, 701.

77. Mr. Tchamambe's removal order has been final for around 20 years, and he has been detained for more than six months before his § 2241 was filed. *Gozo*, 309 F. App'x at 346. Mr. Tchamambe's removal is not reasonably foreseeable. *Id.* Respondents have been unable to remove Mr. Tchamambe in the past due to his lack of identity documents, nor can they now. The only reason given for his detention and supposed removal is the abrupt statement: "You know why." Respondents have not taken the requisite steps to effectuate his removal to Cameroon, nor have they indicated any reason as to why his removal is reasonably foreseeable.

78. Mr. Tchamambe's detention, which now exceeds the six-month reasonable period set forth in *Zadvydas*, is thus unreasonable because his removal is not reasonably foreseeable, and he is not a flight risk nor danger to the community. He should thus be immediately released from detention.

PRAYER FOR RELIEF

WHEREFORE, Petitioner requests that this Court:

- A. Exercise jurisdiction over this matter;
- B. Enjoin Petitioner's removal or transfer outside the jurisdiction of this Court and the United States pending its adjudication of this petition;
- C. Declare that Petitioner's detention violates the Due Process Clause of the Fifth Amendment, the INA and implementing regulations, the APA, and the *Accardi* doctrine;
- D. Order Petitioner's immediate release;
- E. Award Petitioner costs and reasonable attorney's fees; and
- F. Grant such other relief as this Court may deem just and proper.

July 10, 2026

Respectfully Submitted,

/s/ Thomas Evans

Thomas Evans

GA Bar Number: 305649

Kuck Baxter LLC

365 Northridge Road, Suite 300

Atlanta, GA 30350

Phone: 404-949-8176

Fax: 404-816-8615
tevans@immigration.net

Attorney for Petitioner

28 U.S.C. § 2242 VERIFICATION STATEMENT

I am submitting this verification on behalf of the Petitioner because I am the Petitioner's attorney. On the basis of documents, discussions with Petitioner's immigration counsel, and Petitioner's family, I hereby verify that the statements made in this Petition and Complaint are true and correct to the best of my knowledge.

/s/ Thomas Evans

Thomas Evans

GA Bar Number: 305649

Kuck Baxter LLC

365 Northridge Road, Suite 300

Atlanta, GA 30350

Phone: 404-949-8176

Fax: 404-816-8615

tevans@immigration.net

CERTIFICATE OF COMPLIANCE

I hereby certify that the document to which this certificate is attached has been prepared with one of the fonts and point selections approved by the Northern District of Georgia in Local Rule 5.1 for electronic filing.

/s/ Thomas Evans
Thomas Evans
Georgia Bar No. 305649
Kuck Baxter, LLC
365 Northridge Road, Suite 300
Atlanta, Georgia 30350
Tel: (404) 949-8176
Fax: (404) 816-8615
tevens@immigration.net

CERTIFICATE OF SERVICE

I, Thomas Evans, hereby certify that on July 10, 2026, I filed the foregoing with the Clerk of Court using the CM/ECF system. Service has been made of all documents required to be served by Fed.R.Civ.P. 5(a) in a manner authorized by Fed.R.Civ.P. 5(b) and (c). I hereby certify that I have mailed a hard copy of the document to the above individual pursuant to Fed.R.Civ.P. 4 via first-class mail to:

Warden, Robert A Deyton Detention Facility
11866 Hastings Bridge Road
Lovejoy, Georgia 30250

LaDeon Francis
Director of Atlanta ICE Field Office
Office of the General Counsel
245 Murray Lane, SW, Mail Stop 0485
Washington, DC 20528-0485

Todd Lyons
Acting Director
U.S. Immigration and Customs Enforcement
Office of the General Counsel
245 Murray Lane, SW, Mail Stop 0485
Washington, DC 20528-0485

Markwayne Mullin
Secretary, Department of Homeland Security
425 I Street
Washington, D.C. 20536

Todd Blanche
Acting U.S. Attorney General
950 Pennsylvania Avenue, NW

Washington, D.C. 20530

Theodore S. Hertzberg
c/o Civil Process Clerk
Acting U.S. Attorney, Northern District of Georgia
Richard B. Russell Federal Building 75 Ted Turner Dr. SW
Suite 600
Atlanta, GA 30303-3309

Respectfully submitted,

/s/ Thomas Evans

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Jean Sylvain Ngatcham TCHAMAMBE, Case No.

Petitioner,

Warden, Robert A Deyton Detention Facility; LaDeon FRANCIS, Field Office Director, Atlanta Field Office, United States Immigration and Customs Enforcement; Todd M. LYONS, Acting Director, United States Immigration and Customs Enforcement; Markwayne MULLIN, Secretary of Homeland Security; Todd BLANCHE, Acting United States Attorney General, *in their official capacities,*

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**PETITION FOR A WRIT OF
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INJUNCTIVE RELIEF**

LIST OF EXHIBITS

<u>Exhibit A</u>	Copy of Notice to Appear
<u>Exhibit B</u>	January 14, 2026, Order Denying Motion to Reopen
<u>Exhibit C</u>	Family Biographical Documents
<u>Exhibit D</u>	Order of Supervision
<u>Exhibit E</u>	Screenshot of ICE Detainee Locator