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CLERK U S DISTRICT COURT DISTRICT OF ARIZONA	
BY _____	DEPUTY

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

UNITED STATES DISTRICT COURT

for the
District of Arizona

Aleksandr KNIAZEV

Petitioner

v.

Kristopher Kline

Respondent

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

Case No. **CV25-02036-PHX-SPL--JZB**
(Supplied by Clerk of Court)

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

Personal Information

- (a) Your full name: Aleksandr KNIAZEV

(b) Other names you have used: Aleksandr GRIAZEV
- Place of confinement:

(a) Name of institution:

(b) Address: 3250 N. Pinal Parkway
Florence, AZ 85132

(c) Your identification number: A [REDACTED]
- Are you currently being held on orders by:

☒ Federal authorities ☐ State authorities ☐ Other - explain:
- 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 number of criminal case:

(c) Date of sentencing:

☒ Being held on an immigration charge

☐ Other (explain):

Decision or Action You Are Challenging

- 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)

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- ☐ 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: _____

(b) Docket number, case number, or opinion number: Alien number: A 

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

Prolonged detention without any violation. I came to the Port of Entry to seek asylum but have been detained ever since, detained in subhuman conditions in Florence, AZ, sleeping on the concrete floor without pillows or blankets, without access to normal food or medicine. I have had no access to Immigration Court either.

(d) Date of the decision or action: 04/10/2025

Your Earlier Challenges of the Decision or Action7. **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: Immigration and Customs Enforcement

(2) Date of filing: 05/03/2025

(3) Docket number, case number, or opinion number: A 

(4) Result: Denial Without Explanation

(5) Date of result: 05/22/2025

(6) Issues raised: Unlawful detention, no access to the Immigration Court, no credible fear interview, attempt to remove petitioner despite genuine fear of persecution and torture in Russia. Petitioner came to the U.S. Port of Entry to ask for asylum and did not break any laws. His prolonged detention is cruel and unjustified

(b) If you answered "No," explain why you did not appeal: _____

8. **Second appeal**

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

☐ Yes ☒ No

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(a) If "Yes," provide:

(1) Name of the authority, agency, or court: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

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

There is no appellate review of the decision.

9. **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: _____

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

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

There is no appellate review of the decision.

10. **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

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If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

- (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: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

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

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☒ Yes

☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: 04/10/2025

(b) Date of the removal or reinstatement order: _____

(c) Did you file an appeal with the Board of Immigration Appeals?

☐ Yes

☒ No

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If "Yes," provide:

(1) Date of filing: _____

(2) Case number: _____

(3) Result: _____

(4) Date of result: _____

(5) Issues raised: _____

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

☐ Yes

☒ No

If "Yes," provide:

(1) Name of court: _____

(2) Date of filing: _____

(3) Case number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

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: _____

(b) Name of the authority, agency, or court: _____

(c) Date of filing: _____

(d) Docket number, case number, or opinion number: _____

(e) Result: _____

(f) Date of result: _____

(g) Issues raised: _____

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: I came to the U.S. Port of Entry in Otay Mesa, CA to ask for asylum. I did not attempt to enter illegally and did not break any laws. I was taken into detention, initially in Otay Mesa, CA, later to San Luis, AZ and finally to Florence, AZ, where I am being held in subhuman conditions, forced to sleep on the concrete floors in overcrowded quarters without blankets or pillows, without decent food or water.

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

I approached the Otay Mesa Port of Entry on 04/10/2025 and said that I fear returning to Russia. I was taken into detention and interviewed only for fear of torture rather than fear of persecution in general as had been the general rule for years. Even though I clearly described episodes of torture and the fact that political prisoners are tortured and murdered in Russia is common knowledge, I received a negative finding and no Q & A sheet of the interview. It was conducted telephonically, and I have reasons to believe, the officer did not even listen.

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

☒ Yes

☐ No

GROUND TWO: I am being held in torturous conditions and fear for my health and life. I sleep on the concrete floor and have no access to normal food, water or medicine.

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

The detention center in Florence has been a subject of numerous complaints of abusive treatment and poor access to health care. I am screamed at and treated worse than an animal daily. I never thought that I could end up in such abusive conditions simply for asking for political asylum at the Port of Entry.

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

☒ Yes

☐ No

GROUND THREE:

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

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

☐ Yes

☐ No

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GROUND FOUR:

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

(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:

Request for Relief

15. State exactly what you want the court to do: Release me from detention, stay my removal and allow me to present my asylum claim to the Immigration Court.

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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:

06/10/2025

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: 06/08/2025



Signature of Petitioner

Signature of Attorney or other authorized person, if any

Aleksandr Kniazev

Alien #: A 

3250 N. Pinal Pkwy

Florence, AZ 85132

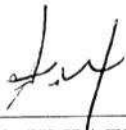
TO THE COURT OF THE UNITED STATES FOR THE DISTRICT OF ARIZONA

Declaration in Support of Habeas Corpus Petition

I, Aleksandr KNIAZEV, a Russian citizen and detainee at the Florence ICE Detention Center in Arizona, A#  declare under penalty of perjury:

1. I am a citizen of Russia. I sought asylum at the Otay Mesa, CA Port of Entry on 04/10/2025. I have been detained ever since.
2. I have not been issued a Notice to Appear.
3. I was interviewed un Convention against Torture (CAT) and had a negative finding despite having described clear episodes of torture in the hands of the law enforcement.
4. I have not had a credible fear of persecution interview or an hearing with an Immigration Judge even though I had a right to such interview per 8 C.F.R. §208.31(g)(f). Per same regulation, a negative finding of the credible fear interview is reviewable by an Immigration Judge.
5. The ICE officers have already tried to remove me twice but returned me to the facility. The denial of all procedural safeguards violates my rights under the Fifth Amendment which guarantees Due Process of Law and Sixth Amendment which guarantees my right to a fair and impartial hearing.
6. I am currently detained in subhuman conditions, have to sleep on the concrete floor without a mattress or a blanket, not provided with adequate food and subjected to constant verbal abuse by the staff and officers.
7. I have genuine fear of persecution, torture or death for my political views in Russia and respectfully seek an opportunity to present my case before the Immigration Court.

I respectfully request that the Court grant my Petition for a Writ of Habeas Corpus and order my hearing.



Aleksandr KNIAZEV

06/08/2025

PROOF OF SERVICE

I certify that true and correct copies of

1) Aleksandr Kniazev's Habeas Corpus Petition and Attachments
were served via USPS Priority Mail on Warden Kristopher Kline, Florence ICE Detention
Facility, 3250 N. Pinal Parkway, Florence, AZ 85132.

 06/10/2025

Alexander Markman, Esq.

Enforcement & Removal Operations

U.S. Department of Homeland Security
880 Front Street, Suite 3200
San Diego, CA 92101



U.S. Immigration
and Customs
Enforcement

Alexander Markman
1901 First Avenue Ste 208
San Diego, CA 92101

Dear Attorney Markman,

This letter is in response to the application for a Stay of Deportation or Removal, Form I-246, you filed on behalf of your client, Kniazev, Aleksandr, A [REDACTED] on May 09, 2025.

Please be aware that pursuant to Title 8 of Code of Federal Regulations (8 CFR) Section 241.6(a): "Neither the request nor failure to receive notice of disposition of the request shall delay removal or relieve the alien from strict compliance with any outstanding notice to surrender for deportation or removal."

After careful consideration of all the factors pertaining to your client, I have determined that a Stay of Removal is not warranted. The request for a Stay of Removal is denied.

Sincerely,

A handwritten signature in black ink, appearing to read "D. Barlow", written over a horizontal line.

Danny R. Barlow
(A) Assistant Field Office Director

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

APPLICATION FOR A STAY OF DEPORTATION OR REMOVAL

A decision in a stay of deportation or removal application is within the sole discretion of the Secretary of Homeland Security or his or her designee, including the Field Office Director. You may not appeal his or her decision.

1. Who may file this application?

Anyone ordered deported or removed from the United States may apply for a stay of deportation or removal under 8 C.F.R. 241.6. Fill out a separate application with required documentation (see item 3) for each family member and others who will also seek a stay of deportation or removal.

2. Where should I submit this application?

Submit this application in person* to your local Enforcement and Removal Operations (ERO) Field Office. You can locate your nearest ERO Field Office at: <http://www.ice.gov/contact/ero/index.htm>

- **If you are detained**, file this application with the ERO Field Office that has jurisdiction over your custody.
- **If you are not detained**, file this application with the ERO Field Office closest to your residence. **If you have a problem delivering the application in person, contact your local ERO Field Office to see if delivery would be permitted by general mail or another delivery service.*

3. What identity documents do you require from me?

Provide documentation from category A, B, or C below. All documents submitted will be retained by ERO pending final disposition in your case.

- (A) **Original passport** - Valid for 6 months past the time period being requested **OR**
- (B) **Copy of passport** - Valid for 6 months past the time period being requested **AND** a copy of birth certificate or other identity documents **OR**
- (C) **If you have no valid passport** - If your country of citizenship requires a passport for entry and you do not have a valid passport or a passport that is valid for 6 months past the time period you requested, you must provide proof that you applied for a passport or similar travel document. A copy of your application, proof of fee being paid and a copy of all documentation you submitted is required. If you receive a response that your application has been received, include a copy of that correspondence.

4. What evidence or documentation should I submit with this application?

- **Medical** - If the basis of your request is due to a medical condition, you must obtain documentation from your doctor regarding your medical condition, treatment, prognosis, and any assistance you need relating to your condition
- **Arrests** - Submit police reports and disposition of all arrests
- **Convictions** - Submit judgment, conviction and sentencing documents for all convictions
- **Summary** - Submit your reasons why you are requesting a stay of deportation or removal. Provide any additional documentation or evidence that would support your basis for a stay.

5. What fees should I submit with this application?

The fee for processing this application is \$155.00. Include the fee with the application. There is no refund, regardless of the action taken. Payments must be made out to, "Department of Homeland Security" or "Immigration and Customs Enforcement". **Accepted methods of payment:** U.S. Cash, Money Order, or Cashier's Check.

6. Why could ICE reject this application?

- Incorrect fee (erroneous fee amounts will not be refunded)
- Application filed at incorrect ERO Field Office
- Multiple applicants listed on same application
- Failure to sign your application
- Failure to submit application in person
- Failure to submit required identity documents. (see item 3)
- Incorrect home (physical) address listed on application
- You are currently categorized as an ICE fugitive or you have made other attempts to hinder your deportation or removal
- When applicable, failure to completely and clearly fill out the section listed as, "Information if form prepared by other than applicant"

7. Why could ICE deny this application?

- Failure to submit medical documentation that supports your reason for this request, if applicable
- Failure to submit your statement or summary that explains why you submitted this request
- Record of criminal activity
- Threat to self or others
- Inaccurate, incomplete or untruthful information
- Not currently under a final order of deportation or removal
- Discretion of the Field Office Director or designee

8. What will happen when I submit this application?

- You may be fingerprinted (if 14 years or older)
- You may be photographed
- Your criminal history (if any) will be reviewed
- Your information will be entered into Department of Homeland Security databases.

9. What if this application is approved?

- You will be issued an Order of Supervision (OSUP) and be required to comply with the conditions listed in the OSUP
- You may have other conditions to comply with set by the Field Office Director or designee
- You may be required to post an OSUP bond (minimum bond amount: \$1,500.00)

10. Why could ICE revoke my stay of deportation or removal after it is approved?

- Arrest by any law enforcement officer
- Conviction of any crime(s)
- A violation of the OSUP
- A violation of the terms of an OSUP bond
- For any reason(s) at the discretion of the Field Office Director or designee

11. What can happen if I submit false information?

All statements made in response to questions in this application are declared to be true and correct under penalty of perjury pursuant to 18 U.S.C. 1546. The knowing placement of false information on the application may subject you, or the preparer of the application, to criminal penalties under 18 U.S.C. 1546, and you and the preparer to civil and criminal penalties pursuant to the Immigration and Nationality Act 274C and 8 U.S.C. 1324c.

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs Enforcement

APPLICATION FOR A STAY OF DEPORTATION OR REMOVAL

PRIVACY NOTICE

Authority: The collection of this information is authorized by 8 U.S.C. § 1231 and 8 CFR § 241.6.

Purpose: The information requested is being collected to enable U.S. Immigration and Customs Enforcement (ICE) to determine your eligibility under the Immigration and Nationality Act for a stay of deportation or removal from the United States.

Agency Disclosure of Information: For United States Citizens, Lawful Permanent Residents, or individuals whose records are covered by the Judicial Redress Act of 2015 (5 U.S.C. § 552a note), your information may be disclosed in accordance with the Privacy Act of 1974, 5 U.S.C. § 552a(b), including pursuant to the routine uses published in the DHS/USCIS-ICE-CBP-001 Alien File (A-File), Index, and National File Tracking Systems of Records Notice (SORN), which can be viewed at www.dhs.gov/privacy.

For all others, as appropriate under United States law and DHS policy, the information you provide may be shared internally within the U.S. Department of Homeland Security (DHS), as well as federal, state, local, tribal, territorial, and foreign law enforcement; other government agencies; and other parties for collection, enforcement, investigatory, litigation, or other purposes.

Providing Information to DHS: Furnishing this information is voluntary. However, requests for stays of deportation or removal will not be considered unless this form is completed.

PUBLIC REPORTING BURDEN

U.S. Immigration and Customs Enforcement is collecting this information as a part of its agency mission under the Department of Homeland Security. The estimated average time to review the instructions, search existing data sources, gather and maintain the data needed and completing and reviewing this collection of information is 30 minutes (0.50 hours) per response. Responses to this collection of information are voluntary for anyone ordered deported or removed from the United States. An agency may not conduct or sponsor, and a person is not required to respond to, an information collection unless it displays a currently valid OMB Control Number. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to:

Office of the Chief Information Officer/Forms Management Officer
U.S. Immigration and Customs Enforcement 500 12th Street, SW,
Washington, DC 20536-5202
(Do not mail your completed application to this address.)

NOTICE - A pending application does not preclude the execution of a final order of deportation or removal. The Field Office Director may at his or her discretion revoke the approval of this application and execute the order of removal at a date and time of his or her choosing. No advance notice is required for the execution of a final order of removal. Additionally, provision of false information could result in the denial of your application.

DEPARTMENT OF HOMELAND SECURITY
U.S. Immigration and Customs EnforcementOMB No. 1653-0021
Expires: 10/31/2027

APPLICATION FOR A STAY OF DEPORTATION OR REMOVAL

Action Block - For ICE Use Only		Fee/Date Stamp
☐ GRANTED ☐ One Year ☐ Six Months ☐ Three Months ☐ Other: _____ ☐ DENIED ☐ Denial letter attached. ☐ REJECTED ☐ Incorrect Fee ☐ Application was not submitted in person ☐ Other: _____ ☐ Additional information attached.		
Date: _____ Decision made by: _____ (Printed Name/Title)		
Deciding Official Signature (Sign in ink): _____		Office: _____

A-File Number:		Date: 05/03/2025	If you are currently detained by ICE, provide the name of the detention facility: Otay Mesa Detention Facility	
Last Name: KNIAZEV		First Name: Aleksandr		Middle Name: _____
Address (Number and Street):		Country of Citizenship: Russia	Passport No:	Expiration Date:
Apartment Number: _____		Length of stay requested: ☒ One year ☐ Six months ☐ Three months ☐ Other: _____		
Town/City: San Diego	State: CA	Zip Code:	Arrested by police or other law enforcement agency (other than for immigration reasons) ☐ Yes - Documents attached ☒ No	
Telephone Number: _____	Cell Telephone Number: _____			

REASON(S) FOR REQUESTING A STAY OF DEPORTATION OR REMOVAL:

I have fear of return to Russia. I was only interviewed for fear of torture and did not get a copy of the Q&A. I am filing an asylum application with USCIS. The case of Raices v. Noem currently pending before U.S. District Court for the District of Columbia may give me a chance to have a day in court.

EVIDENCE SUBMITTED (attached):

☐ Medical ☐ Brief ☐ Other (specify): _____	
I certify under penalty of perjury that the information provided and contained herein is true and correct to the best of my knowledge and belief.	
Aleksandr KNIAZEV (Printed Name)	 (Signature) (Sign in ink)

INFORMATION IF FORM PREPARED BY OTHER THAN APPLICANT:

I declare under penalty of law that this document was prepared by me at the request of the applicant and is based on all information of which I have knowledge. I understand that providing false information on behalf of the applicant could result in criminal prosecution and, upon conviction, a fine or imprisonment or both.				
Alexander Markman (Printed Name)				
 (Signature) (Sign in ink)				
6192323401 (Telephone Number)	1901 First Avenue, Ste. 208 (Street Address)	San Diego (City)	CA (State)	92101 (Zip Code)