FILED
UNITED STATES DISTRICT COURT
DENVER, COLORADO

MAR 18 2026

JEFFREY P. COLWELL
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. _____
(To be supplied by the court)

SARMAD FADHIL MOHAMMED, Applicant,

v. Todd M. Luons (Acting Director ICE)
Robert Guadian (Field Director Denver Office)
Juan Baltazar (Warden)
, Respondent.
(Name of warden, superintendent, jailer, or other custodian)

(Note: If you are attacking the validity of a state conviction or sentence and not the execution of your sentence, you must file an application for a writ of habeas corpus pursuant to 28 U.S.C. § 2254. If you are attacking the validity of a judgment entered in a federal court, you must file a motion pursuant to 28 U.S.C. § 2255 in the federal court that entered the judgment.)

APPLICATION FOR A WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241

NOTICE

Federal Rule of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should not contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include only: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

A. APPLICANT INFORMATION

You must notify the court of any changes to your address where case-related papers may be served by filing a notice of change of address. Failure to keep a current address on file with the court may result in dismissal of your case.

Sarmad Fadhil Mohammed, [redacted] 3130 North Oakland St, Denver, CO 80010
(Applicant's name, prisoner identification number, and complete mailing address)

Indicate whether you are a prisoner or other confined person as follows: (check one)

___ Pretrial detainee
___ Civilly committed detainee
X Immigration detainee
___ Convicted and sentenced state prisoner
___ Convicted and sentenced federal prisoner
___ Other: (*Please explain*) _____

B. RESPONDENT INFORMATION

Sarmad Fadhil Mohammed, 3130 North Oakland St, Denver, CO 80010
(Respondent's name and complete mailing address)

C. STATEMENT OF CLAIMS

State clearly and concisely every claim you are asserting in this action. For each claim, specify the right that allegedly has been violated and all facts that support your claim. If additional space is needed to describe any claim or to assert additional claims, use extra paper to continue that claim or to assert the additional claim(s). Please indicate that additional paper is attached and label the additional pages regarding the statement of claims as "C. STATEMENT OF CLAIMS."

CLAIM ONE: Being held in immigration custody for a long period of time without due process.

Supporting facts:

I, Sarmad Fadhil Mohammed, after working with the United States Army as an Interpretor and an Intelligent Agent, was granted asylum into the United States. I entered the United States on October 30, 2008 as a refugee. I was given a social security card, work permit, Colorado ID, and Colorado driver's license. In July 2012, I committed a felony, which was sexual assault. I was convicted June 14, 2013 and sent to prison. I was released by parole on September 18, 2025. On September 23, 2025, I was picked up by ICE officers from my wife's house. I came into immigration custody on the 23rd and saw an immigration judge on October 20, 2025 who ordered a final order of removal.
-On January 14, 2026, DO Gary Zolock conducted a 90 day review with me and I never received the results of that interview.
-I was not given an interview for a third country screening for asylum.
Risk of flight: I am not a flight risk for I am under extreme supervision with parole and have an ankle monitor. Therefore, all my movements are monitored.
Pose danger to the community: I have worked on myself inside of prison and successfully finished many programs. That is why in August 2025, the parole board members, who was given power by the constitution, deemed me safe to return to society. I am rehabilitated, which is what prisons in the United States are supposed to do.
(Additional paper is attached)

C. STATEMENT OF CLAIMS

A significant likelihood to be deported in a foreseeable future: Due to military actions in Iran by the United States, the war has spilled into Iraq where the Iraqi militias have attacked the United States bases in Iraq. Tensions are still rising as we speak. Airspace over Iraq is closed. Even if ICE has travel documents for me, which they do not, I do not see how it is possible for them to deport me back to Iraq when it is not safe and the airspace is closed. No one knows how long the war will take or how bad it will get.

D. PRIOR APPLICATIONS

Have you ever filed a lawsuit, other than this lawsuit, in any federal court in which you raised or could have raised the claim(s) raised in this action? __Yes X No (*check one*).

If your answer is "Yes," complete this section of the form. If you have filed more than one prior application, use additional paper to provide the requested information for each prior application. Please indicate that additional paper is attached and label the additional pages regarding previous lawsuits as "D. PRIOR APPLICATIONS."

Name and location of court: _____

Case number: _____

Type of proceeding: _____

List the claim(s) raised: _____

Date and result: (Attach a copy of the decision if available) _____

Result on appeal, if appealed: _____

E. ADMINISTRATIVE REMEDIES

WARNING: You must exhaust administrative and/or state remedies before filing an action in federal court pursuant to 28 U.S.C. § 2241. Your case may be dismissed if you have not exhausted administrative and/or state remedies. If additional space is needed to explain exhaustion, use extra paper to do so. Please indicate that additional paper is attached and label the additional pages regarding exhaustion as "E. ADMINISTRATIVE REMEDIES."

Explain the steps you have taken to exhaust administrative and/or state remedies:

I have exhausted all options available to me by this facility. Communication with ICE is very poor. They do not have answers to my questions and it is very hard to get in contact with my deportation officer.

F. REQUEST FOR RELIEF

State the relief you are requesting or what you want the court to do. If additional space is needed to identify the relief you are requesting, use extra paper to request relief. Please indicate that additional paper is attached and label the additional pages regarding relief as "F. REQUEST FOR RELIEF."

Order ICE to show cause as to why the court should not grant this motion to me. To order the respondents to answer in the next 20 days. If respondents fail to do that, I should be granted immediate release. I should not be held longer because I am not responsible for the conflict in the Middle East. I would ask to be released to my wife's house with an ankle monitor and supervision until ICE is ready to deport me.

G. APPLICANT'S SIGNATURE

I declare under penalty of perjury that I am the applicant in this action, that I have read this application, and that the information in this application is true and correct. *See* 28 U.S.C. § 1746; 18 U.S.C. § 1621.

Under Federal Rule of Civil Procedure 11, by signing below, I also certify to the best of my knowledge, information, and belief that this application: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending or modifying existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the application otherwise complies with the requirements of Rule 11.

(Applicant's signature)

3/9/2026
(Date)

(Form Revised December 2017)

[redacted]
3130 N. Oakland St.
Denver, Co 80010





Clerk of the Court
ALFRED A. ARRAJ
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