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UNITED STATES DISTRICT COURT
DISTRICT OF COLORADO

YASSINE FAYCAL [redacted] *Plaintiff/Petitioner,* *v.* **JUAN BALTAZAR, In his official capacity as Warden of the Denver Contract Detention Facility;** **ROBERT HAGAN, Field Office Director, Denver Field Office, U.S. Immigration & Customs Enforcement;** **TODD M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement;** **MARKWAYNE MULLIN, Secretary, U.S. Department of Homeland Security;** **PAM BONDI, Attorney General, U.S. Department of Justice.** *Defendants/Respondents.*	**Case No.** **VERIFIED PETITION FOR WRIT OF HABEAS CORPUS PURSUANT TO 28 U.S.C. § 2241**

PETITION FOR WRIT OF HABEAS CORPUS

1. Petitioner Yassine Faycal ("Mr. Faycal") is a noncitizen who has been detained by the U.S. Immigration and Customs Enforcement ("ICE") for more than twenty (20) months. He is a national and citizen of Chad. *See* Exhibit A, Notice to Appear ("NTA").

2. On August 29, 2025, an immigration judge ("IJ") at the Aurora Immigration Court granted Mr. Faycal "Withholding of Removal" after he demonstrated it was more likely than not he would be persecuted in his home country. As a result, Respondents may not remove him to Chad. 8 U.S.C. § 1231(b)(3)(A).

3. More than six months after the IJ's order became administratively final, Respondents have provided no information as to why he remains in custody and it appears there is "no significant likelihood" of his release "in the reasonably foreseeable future." *Zadvydas v. Davis,* 533 U.S. 678, 701 (2001). Thus, Mr. Faycal, by an through undersigned counsel, hereby files this petition for a writ of habeas corpus to prevent Respondents from continuing his unlawful detention.

4. Mr. Faycal respectfully requests this Court order Respondents to show cause within three days, providing their reasons, if any, why his detention is lawful. 28 U.S.C. § 2243. He further requests that during the pendency of this habeas, Respondents be prohibited from transferring him outside the District of Colorado and enjoin Respondents from denying his mandatory statutory and regulatory due process protections.

JURISDICTION AND VENUE

5. This case arises under the Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*, the regulations implementing the INA.

6. The Court also has jurisdiction under 28 U.S.C. § 1331 (federal question); 28 U.S.C. § 1651 (the All Writs Act); U.S. Const. art. I § 9, cl. 2 (suspension clause); 28 U.S.C. § 2241 (habeas corpus); and 5

U.S.C. § 701 (the Administrative Procedure Act).

7. District courts have jurisdiction under 28 U.S.C. § 2241 to hear habeas claims by noncitizens challenging the lawfulness or constitutionality of their civil immigration detention. *See Jennings v. Rodriguez*, 138 S. Ct. 830, 839–42 (2018); *Demore v. Kim*, 538 U.S. 510, 516–17 (2003); *Zadvydas v. Davis,* 533 U.S. 678, 687 (2001). Indeed, "the essence of habeas corpus is an attack by a person in custody upon the legality of that custody, and that the traditional function of the writ is to secure release from illegal custody." *Preiser v. Rodriguez,* 411 U.S. 475, 484 (1973). Furthermore, "[c]hallenges to immigration detention are properly brought directly through habeas." *Soberanes v. Comfort,* 388 F.3d 1305, 1310 (10th Cir. 2004)(citing *Zadvydas,* 533 U.S. at 687-88).

8. Venue is proper under 28 U.S.C. § 1391(e) because the GEO Denver Contract Detention Center in Aurora, Colorado is located in Arapahoe County, within the District of Colorado. At least one of the Respondents is a resident of this District, and a substantial part of the events giving rise to the claims in this action took place within this District. 28 U.S.C. § 1391(e); *see also Braden v. 30th Judicial Circuit,* 410 U.S. 484, 493-93 (1973).

REQUIREMENTS OF 28 U.S.C. § 2243

9. The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the respondents "forthwith," unless the petitioner is not entitled to relief. 28 U.S.C. § 2243. If an order to show cause is issued, the Court must require respondents to file a return "within *three days* unless for good cause additional time, not exceeding twenty days, is allowed." *Id.* (emphasis added).

10. Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as "perhaps the most

important writ known to the constitutional law of England, affording as it does a *swift* and imperative remedy in all cases of illegal restraint or confinement." *Fay v. Noia*, 372 U.S. 391, 400 (1963)(emphasis added).

PARTIES

11. Mr. Faycal is a twenty-five-year old man from Chad. He arrived to the United States on or about July 11, 2024. Exh. A. He has been in the custody and under the direct control of Respondents and their agents for a total of approximately twenty (20) months.

12. Respondent Juan Baltazar is the warden of the Geo Group, LLC., Denver Contract Detention Facility located in Aurora, Colorado. He is a legal custodian of Mr. Faycal. He is sued in his official capacity.

13. Respondent Robert G. Hagan is the Field Office Director of the Denver Field Office of Immigration and Customs Enforcement ("ICE") Enforcement and Removal Operations ("ERO"). In that capacity, he is charged with overseeing all ICE detention centers in Colorado and has the authority to make custody determinations regarding individuals detained in these facilities. Respondent Hagan is a legal custodian of Petitioner. He brings this action against Respondent Hagan in his official capacity.

14. Respondent Markwayne Mullin is the Secretary of the Department of Homeland Security ("DHS"). DHS oversees ICE, which is responsible for the administration and enforcement of the immigration laws and has supervisory responsibility for, and authority over, the detention and removal of non-citizens throughout the United States. Respondent Mullin is the ultimate legal custodian of Petitioner. He brings this action against Respondent Mullin in his official capacity.

15. Respondent Pamela Bondi is the Attorney General of the United States. As the Attorney

General, she is responsible for the actions of the Department of Justice ("DOJ"). The Executive Office for Immigration Review ("EOIR") is a component agency of the DOJ. Therefore, she oversees the immigration court system, including all Immigration Judges, Immigration Courts, and the Board of Immigration Appeals ("BIA"), and has authority over immigration detention. Respondent Bondi routinely transacts business in the District of Colorado and has custodial authority over Petitioner. He brings this action against Respondent Bondi in her official capacity.

STATEMENT OF FACTS

16. Mr. Faycal, a national and citizen of Chad, has been in continuous immigration detention for more than twenty (20) months. He was part a political opposition party in Chad who spoke out against the government. For this reason, he was arrested and placed into detention where he was repeatedly beaten and shot in the hand. Shortly thereafter, he fled the country.

17. On or about July 11, 2024, Mr. Faycal entered the United States to seek asylum. Exh. A. He remained in detention throughout his removal proceedings. Exhibit B, *Notice of Custody Determination.* On August 29, 2025, the IJ granted him withholding of removal under INA § 241(b)(3). Exhibit C, *Order of the Immigration Judge*. The IJ found it "more likely than not" that Mr. Faycal would be tortured if returned to Chad. *Id.*; *see also* 8 C.F.R. § § 1208.16.

18. Both parties reserved appeal. However, within thirty (30) days after the IJ's order, neither party submitted an appeal. Exhibit D, *Automated Case Information*.

19. Approximately four months (4) passed when Mr. Faycal received an ICE letter stating ICE would continue his detention. The letter appeared to be a generic form explaining Mr. Faycal had *not* demonstrated if released he would *not* pose a danger to the community or a flight risk. Exhibit E, *Decision to Continue Detention*. Then on January 17, 2026, ICE interviewed Mr. Faycal as part

of a custody status review. Exhibit F, *Notice to Alien of Interview for Review of Custody Status.* Thereafter, Mr. Faycal did not receive any information concerning the outcome of the interview.

20. To date, Mr. Faycal continues to be detained in Respondents' custody at the Denver Contract Detention facility in Aurora, Colorado. ICE has not provided any reason for why Mr. Faycal remains in indefinite detention. ICE also has not provided any indication that he will be released in the foreseeable future.

LEGAL FRAMEWORK

A. Relief Under the Immigration and Nationality Act ("INA"): Withholding of Removal.

21. Non-citizens in immigration removal proceedings may seek three main forms of relief based on a fear of returning to their home country of origin: asylum, withholding of removal ("withholding"), and relief under the Convention Against Torture ("CAT"). *See* 8 U.S.C. § 1158; 8 U.S.C. § 1231; 8 C.F.R. § 208.16. Relevant here, under President Biden's "Circumvention of Lawful Pathways" Final Rule, individuals who entered the United States through the southern border without inspection between May 10, 2023 and May 10, 2025 were presumptively ineligible for asylum unless they qualified for a few narrow exceptions. *See* 88 Federal Register 31314, (May 16, 2023); 8 C.F.R. § 208.33(a). However, asylum seekers may still be eligible for withholding or CAT protection. *See also* 8 C.F.R. 208.

22. When an IJ grants a non-citizen withholding, the IJ then issues a removal order and simultaneously "withholds" that order with respect to the country or countries for which the non-citizen demonstrated a sufficient risk of persecution or torture. *See Johnson v. Guzman Chavez*, 594 U.S. 532, 539 (2021).

23. Once withholding is granted, either party has the right to appeal that decision to the BIA within 30 days. *See* 8 C.F.R. § 1003.38(b). If both parties waive appeal or neither party appeals within the 30-day period, the withholding grant and the accompanying removal order become administratively final. 8 C.F.R. § 1241.1. The IJ granted Mr. Faycal withholding on August 29, 2025. Exh. C. Both parties reserved appeal. However, during the 30-day period, neither party appealed. Exh. D.

24. When a non-citizen has a final withholding grant, DHS cannot remove them to the country or countries for which they demonstrated a sufficient likelihood of persecution or torture. *See* 8 U.S.C. § 1231(b)(3)(A); 8 C.F.R. § 1208.17(b)(2). While ICE is authorized to remove non-citizens who were granted withholding to alternative countries, *see* 8 U.S.C. § 1231(b); 8 C.F.R. § 1208.16(f), the removal statute specifies restrictive criteria for identifying appropriate countries. For example, even if an alternative country "accepts" a noncitizen, ICE cannot remove a noncitizen to a country where his life or freedom will be threatened because of his race, religion, nationality, membership in a particular social group, or political opinion, or where it is more likely than not that the noncitizen would be tortured. 8 U.S.C. § 1231(b)(3)(A); 8 C.F.R. § 208.16.

25. Mr. Faycal cannot be removed to Chad, per the IJ's order, because he will be persecuted there. However, he is only a national and citizen of Chad. He has only ever resided in Chad and no other country. ICE has not informed Petitioner of any alternative countries who would accept him where his life would not be threatened.

B. Statutory and Constitutional Framework: Limits to Post-Final Order Detention.

26. 8 U.S.C. § 1231(a)(1)-(2) authorizes detention of noncitizens during "the removal period," which is defined as the 90-day period beginning on "the latest" of either "[t]he date the order of

removal becomes administratively final"; "[i]f the removal order is judicially reviewed and if a court orders a stay of the removal of the [noncitizen], the date of the court's final order"; or "[i]f the [noncitizen] is detained or confined (except under an immigration process), the date the [noncitizen] is released from detention or confinement." 8 U.S.C. § 1231(a)(1)-(2).

27. Although 8 U.S.C. § 1231(a)(6) permits detention "beyond the removal period" for noncitizens who have been ordered removed, the Supreme Court has recognized limits to such continued detention. In *Zadvydas,* the Supreme Court held that "the statute, read in light of the Constitution's demands, limits [a noncitizen's] post-removal-period detention to a period reasonably necessary to bring about that [noncitizen's] removal from the United States." *Zadvydas v. Davis,* 533 U.S. 678, 689 (2001). "[O]nce removal is no longer reasonably foreseeable, continued detention is no longer authorized by statute." *Id.* at 699.

28. In determining the reasonableness of detention, the Supreme Court recognized that, if a noncitizen has been detained for longer than six months following the initiation of their removal period, their detention is presumptively unreasonable unless deportation is reasonably foreseeable; otherwise, it violates that noncitizen's due process right to liberty. *Id.* at 701.

29. The Court's ruling in *Zadvydas* is rooted in due process's requirement that there be "adequate procedural protections" to ensure that the government's asserted justification for a noncitizen's physical confinement "outweighs the 'individual's constitutionally protected interest in avoiding physical restraint.'" *Id.* at 690 (quoting *Kansas v. Hendricks,* 521 U.S. 346, 356 (1997)). Thus, after the six month period of detention elapses, continued detention violates both § 1231(a)(6) and the Due Process Clause of the Fifth Amendment. *See Zadvydas*, 533 U.S. at 699-701.

30. Courts throughout the Tenth Circuit, including in the District of Colorado, have repeatedly relied upon *Zadvydas* in ordering individuals' release from immigration custody. *See e.g.*, *Morales-Fernandez v. INS*, 418 F.3d 1116, 1123 (10th Cir. 2005)(citing *Clark v. Martinez*, 125 S. Ct. 716, 727 (2005)(holding "[t]he Government having brought forward nothing to indicate that a substantial likelihood of removal subsists despite the passage of six months…; and the District Court in each case having determined that removal to Cuba is not reasonably foreseeable; the petitions for habeas corpus should have been granted."); *Nzayikorera v. Fabbricatore*, No. 21-cv-02037, 2021 WL 9385836 (D. Colo. Sep. 9, 2021) (same); *Ahrach v. Baltazar*, No. 25-cv-03195-PAB, 2025 WL 322529, *5 (D. Colo. Nov. 19, 2025) (granting habeas petition and ordering release from post-order detention when the government has not offered evidence that there is progress towards removal and acknowledging that *Zadvydas* courts have found that unsubstantiated assertions that the government will pursue removal are insufficient to satisfy its burden).

31. Mr. Faycal is not required to show that there is *no* significant likelihood of his removal in the reasonably foreseeable future. Instead, he must provide "good reason" to believe that his removal is not significantly likely in the reasonably foreseeable future. *Zadvydas,* 533 U.S. at 701. Furthermore, "*Zadvydas* rejected the proposition that continued detention is permissible 'as long as good faith efforts to effectuate . . . deportation continue.'" *Ahrach,* 2025 WL 3227529, at *4 (quoting *Zadvydas,* 533 U.S. at 702). "Instead, the government must actually make legitimate progress towards removal." *Id.* (citing *Hassoun v. Sessions,* 2019 WL 78984, at *5 (W.D.N.Y. Jan. 2, 2019)).

32. Mr. Faycal's detention has exceeded the six-month period that *Zadvydas* recognized as presumptively reasonable. He was granted withholding on August 29, 2025. Exh. C. He received a

form letter from ICE regarding his custody status on December 17, 2025, which gave no circumstance specific reason for why he remained detained. Exh. E. On January 17, 2026, he received an ICE interview regarding his custody status, but thereafter received no information concerning the result of this interview. Exh. F.

33. Where a petitioner has provided "good reason to believe there is no significant likelihood of removal in the reasonably foreseeable future," the burden shifts to the government to rebut that showing. *Zadvydas,* 533 U.S. at 701. Due deference is owed to the government's assessment of the likelihood of removal and the time it will take to execute removal. *Id.* at 700. However, Respondents have not shown any reasonably foreseeable removal in the future. In particular, they have not offered any concrete information about a timeline for when his indefinite detention will end. Thus, to comport with Mr. Faycal's due process rights, he respectfully asks this Court to order his immediate release.

C. DHS Regulations: Notice, an Opportunity to be Heard, and the Reasonable Foreseeability of Removal to a Third Country.

34. DHS regulations provide that, by the end of the 90-day removal period, the local ICE field office with jurisdiction over the noncitizen's detention must conduct a post-order custody review ("POCR") to determine whether the noncitizen should remain detained or be released pending removal. *See* 8 C.F.R. § 241.4(c)(1), (k)(1)(i)("Prior to the expiration of the removal period, the district director . . . shall conduct a custody review . . .").

35. Three months *after* the lapse of the 90-day removal period, or six months after the issuance of a final order, authority over custody determinations transfers to the Executive Associate Commissioner to conduct an additional custody review on that date or "as soon thereafter as practicable," referred to as the 180-day POCR. *See* 8 C.F.R. § 241.4(k)(1)(ii) and (k)(2)(i)-(ii).

36. To comply with *Zadvydas*, DHS issued additional regulations in 2001 that established "special review procedures" to determine whether detained noncitizens with final removal orders are likely to be removed in the reasonably foreseeable future. *See Continued Detention of Aliens Subject to Final Orders of Removal*, 66 Fed. Reg. 56,967 (Nov. 14, 2001). If ICE Headquarters determines that removal is not reasonably foreseeable but nonetheless seeks to continue detention based on "special circumstances," it must justify the continued detention based on narrow grounds such as national security or public health concerns, 8 C.F.R. § 241.14(b)-(d), or by demonstrating, by clear and convincing evidence before an IJ, that the noncitizen is "specially dangerous." 8 C.F.R. § 241.14(f). As of this date, DHS has offered no such showing.

37. Moreover, under 8 U.S.C. § 1231, DHS has the authority to remove noncitizens granted withholding to a third country. 8 U.S.C. § 1231(b); 8 C.F.R. § 1208.17(b)(2). The term "third country" refers to one not previously designated by an IJ or DHS during the underlying removal proceedings, which generally is the noncitizen's country of nationality or citizenship. *D.V.D. v. Dep't of Homeland Sec.*, No. 25-cv-10676, 2025 WL 942948, at * 1 (D. Mass. Mar. 28, 2025). Although the statutory framework for third country removal has long existed, DHS rarely pursued this option in the past. *See Johnson v. Guzman Chavez*, 594 U.S. at 537 (addressing the contention that "DHS often does not remove [a noncitizen] to an alternative country if withholding relief is granted" and "only 1.6% of [noncitizens] who were granted withholding of removal were actually removed to an alternative country"). Under the current administration, however, third country removals have become part of an aggressive detention and deportation agenda—especially in cases of noncitizens who cannot be deported to their home countries because they have shown they are

likely to be persecuted or tortured there.[1] As a result, individuals who would have been released in the past under 8 C.F.R. § 241.4(e), (f) are now at risk of third country removal with no due process protections, despite having won the merits of their fear-based claims.[2]

38. Nevertheless, if DHS intends to remove Petitioner to a third country, DHS must follow a specific statutory sequence outlined by 8 U.S.C § 1231(b)(2)(D)-(E). Of particular note here, DHS may not remove a noncitizen to a country in which they will be persecuted or tortured. 8 U.S.C. § 1231(b)(3)(A); 8 C.F.R. §§ 208.16(c), 208.17(b)(2), 1208.16(c), 1208.17(b)(2). Pursuant to 8 U.S.C. § 1231(b)(3)(A), noncitizens also cannot be removed to a country that was not properly designated by an immigration judge if they have a fear of persecution or torture in that country. *See e.g. Andriasian v. INS*, 180 F.3d 1033, 1041 (9th Cir. 1999); *Kossov v. INS*, 132 F.3d 405, 408–09 (7th Cir. 1998); *El Himri v. Ashcroft*, 378 F.3d 932, 938 (9th Cir. 2004); *cf. Protsenko v. U.S. Att'y Gen.*, 149 F. App'x 947, 953 (11th Cir. 2005) (per curiam) (permitting designation of third country where individuals received "ample notice and an opportunity to be heard"). Even if ICE identifies an appropriate alternative country of removal, the noncitizen must have adequate notice and a meaningful opportunity to seek fear-based relief from removal to that country. 8 U.S.C. §

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[1] *See* Maria Sacchetti, et al, "ICE memo outlines plan to deport migrants to countries where they are not citizens," THE WASHINGTON POST (July 13, 2025), available at: https://www.washingtonpost.com/immigration/2025/07/12/immigrantsdeportations-trump-ice-memo/; *see also* Ximena Bustillo, "The White House is deporting people to countries they're not from. Why?," NATIONAL PUBLIC RADIO, (June 1, 2025), available at: https://www.npr.org/2025/06/01/g-s1-69780/trump-deportations-south-sudan.

[2] *See also* Memorandum from Kristi Noem, Sec'y of Homeland Sec., to Kika Scott, Senior Official Performing the Duties of the Dir., U.S. Citizenship & Immigr. Servs., Pete R. Flores, Senior Official Performing the Duties of the Comm'r, U.S. Customs & Border Prot., & Todd Lyons, Acting Dir., U.S. Immigr. & Customs Enf't, *Guidance Regarding Third Country Removals* (Mar. 30, 2025), https://immigrationlitigation.org/wp-content/uploads/2025/04/43-1-Exh-A-Guidance.pdf;

1231(b)(3). Petitioner has not been given any such notice. With no travel documents issued or notice of a third country willing to accept Mr. Faycal, additional detention is unreasonable because removal is not imminent.

39. Finally, when ICE detains an individual under 8 U.S.C. § 1231(a)(6), federal regulations dictate an individualized determination be carried out, weighing the following factors:

(1) The nature and number of disciplinary infractions or incident reports received when incarcerated or while in Service custody;

(2) The detainee's criminal conduct and criminal convictions, including consideration of the nature and severity of the alien's convictions, sentences imposed and time actually served, probation and criminal parole history, evidence of recidivism, and other criminal history;

(3) Any available psychiatric and psychological reports pertaining to the detainee's mental health;

(4) Evidence of rehabilitation including institutional progress relating to participation in work, educational, and vocational programs, where available;

(5) Favorable factors, including ties to the United States such as the number of close relatives residing here lawfully;

(6) Prior immigration violations and history;

(7) The likelihood that the alien is a significant flight risk or may abscond to avoid removal, including history of escapes, failures to appear for immigration or other proceedings, absence without leave from any halfway house or sponsorship program, and other defaults; and

(8) Any other information that is probative of whether the alien is likely to:
(i) Adjust to life in a community,
(ii) Engage in future acts of violence,
(iii) Engage in future criminal activity,
(iv) Pose a danger to the safety of himself or herself or to other persons or to property, or
(v) Violate the conditions of his or her release from immigration custody pending removal from the United States.

8 C.F.R. § 241.4(f). In the case of Petitioner, ICE has not conducted any individual assessment. *See* Exhibit D and Exhibit E. Thus, Mr. Faycal's detention is unlawful per DHS regulations.

CLAIMS FOR RELIEF

COUNT I
Violation of 8 U.S.C. Section 1231(a)(6) and *Zadvydas*
(Unlawful Post-Final Order Detention)

40. Mr. Faycal re-alleges and incorporates by reference the paragraphs above.

41. Mr. Faycal's continued detention by Respondents violates 8 U.S.C. § 1231(a)(6), as interpreted by *Zadvydas.* Mr. Faycal's 90-day statutory removal period and six-month presumptively reasonable period for continued removal efforts have passed.

42. Hence, under *Zadvydas,* Mr. Faycal's continued detention is unreasonable and not authorized by 8 U.S.C. § 1231.

COUNT II
Violation of the Due Process Clause of the Fifth Amendment Right to the U.S. Constitution

56. Mr. Faycal realleges and incorporates by reference the paragraphs above.

57. Mr. Faycal's removal order became administratively final on September 29, 2025. The removal period began on that day and thus elapsed on December 29, 2025.

58. Mr. Faycal cannot be removed to Chad, and ICE has offered no reason for his indefinite detention. Hence, there is "good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future." *Zadvydas*, 533 U.S. at 701.

59. Consequently, Mr. Faycal's continued detention is untethered to any legal basis. At this stage, DHS's refusal to release Mr. Faycal is "the exercise of power without any reasonable justification" and a violation of due process principles. *County of Sacramento v. Lewis*, 523 U.S. 833, 845 (1998).

COUNT III
Violation of Regulations

60. Mr. Faycal realleges and incorporates by reference the paragraphs above.

61. Respondents continue to detain Mr. Faycal in violation of 8 C.F.R. § 241.4, having not considered the substantive factors set forth in subsections (e) and (f) of that regulation. Were such factors to be properly weighed, it would be apparent that Mr. Faycal is a candidate for release.

PRAYER FOR RELIEF

WHEREFORE Petitioner respectfully requests that this Court:

a. Assume jurisdiction over this matter;

b. Enjoin Respondents from transferring Mr. Faycal outside of the jurisdiction of the District of Colorado pending the resolution of this petition;

c. Pursuant to 28 U.S.C. § 2243, issue an Order to Show Cause ordering Respondents to show cause within three days of why the writ should not be granted;

d. Declare that Respondents' continued detention of Mr. Faycal violates the INA, 8 U.S.C. § 1231(a)(6), and the Due Process Clause of the Fifth Amendment of the U.S. Constitution;

e. Grant a writ of habeas corpus directing Respondents to immediately release Mr. Faycal;

f. Order Respondents to reimburse him his costs of suit and reasonable attorneys' fees incurred in relation to this petition, under the Equal Access to Justice Act, 28 U.S.C. § 2412; and

g. Grant any further relief as this Court deems just and proper.

Date: March 30, 2026

Respectfully submitted,

/s/Barbara Zalewski-Zaragoza

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VERIFICATION

I, Barbara Zalewski-Zaragoza, declare as follows: I am an attorney admitted to practice law before this Court and in the State of California. I am authorized by Mr. Yassine Faycal to file this Petition for Writ of Habeas Corpus on his behalf. Because many of the allegations of this Petition require a legal knowledge not possessed by Mr. Faycal, I am making this verification on his behalf and with his permission. I have read the foregoing Petition for Writ of habeas Corpus and know the contents thereof to be true to my knowledge, information, or belief. I certify under penalty of perjury that the foregoing is true and correct to the best of my knowledge and that this declaration was executed on March 30, 2026.

/s/Barbara Zalewski-Zaragoza

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CERTIFICATE OF SERVICE

I, Barbara Zalewski-Zaragoza, hereby certify that on March 30, 2026, I filed the foregoing with the Clerk of Court using the CM/ECF system. I, Barbara Zalewski-Zaragoza, hereby certify that I have mailed through USPS a hard copy of the document to the individuals identified below pursuant to Fed.R.Civ.P. 4 via certified mail on March 30, 2026.

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