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UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

FATOU TOURE **A** [redacted] Petitioner, v. **MARKWAYNE MULLIN,** Secretary of the U.S. Department of Homeland Security; TODD M. LYONS, Acting Director, U.S. Immigration and Customs Enforcement; **Christopher McGregor,** Director of Phoenix Field Office, U.S. Immigration and Customs Enforcement; and Respondents.	Case No. _____ **PETITION FOR WRIT OF HABEAS CORPUS**

PETITION FOR WRIT OF HABEAS CORPUS
PURSUANT TO 28 U.S.C. § 2241 AND
COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF

I. INTRODUCTION

1. Petitioner, Fatou Toure, is a native and citizen of Senegal who has resided in the United States since her admission in B-2 visitor status on or about August 8, 1998. She is the mother of U.S. citizen daughters, including at least one child with serious medical needs, for whom she has long provided primary care and support.

2. Ms. Toure has been subject to a final order of removal since December 13, 2017, when the Board of Immigration Appeals ("BIA" or "Board") dismissed her appeal from an Immigration Judge's January 24, 2017 decision denying her applications for asylum, withholding of removal, protection under the Convention Against Torture ("CAT"), and cancellation of removal under 8 U.S.C. § 1229b(b).

3. For years after her removal order became final, the Department of Homeland Security ("DHS") did not remove Ms. Toure and instead allowed her to remain in the community under an Order of Supervision ("OSUP").

4. On or about March 4, 2026, Immigration and Customs Enforcement ("ICE") abruptly arrested Ms. Toure in Baltimore, Maryland, and placed her in civil immigration detention at the Eloy Federal Contract Facility in Eloy, Arizona, purporting to act under 8 U.S.C. § 1231, even though the statutory 90-day "removal period" and the presumptive six-month *Zadvydas* period had long since elapsed.

5. Detention of a noncitizen subject to a final order of removal is constitutionally permissible only insofar as it is reasonably related to the legitimate purpose of effectuating removal and does not become potentially indefinite. *Zadvydas v. Davis*, 533 U.S. 678 (2001). After six months of post-order detention, the government may continue to detain only if it can show a significant likelihood of removal in the reasonably foreseeable future.

6. Because Respondents have failed to comply with 8 U.S.C. § 1231 and applicable regulations, have revoked or disregarded Petitioner's OSUP without lawful procedure or adequate explanation, and have not demonstrated a significant likelihood of removal in the reasonably foreseeable future, Petitioner's ongoing detention violates the immigration statute, the Due Process Clause of the Fifth Amendment, and the Accardi doctrine (requiring agencies to follow their own regulations).

7. Petitioner seeks a writ of habeas corpus ordering her immediate release from ICE custody, declaratory relief that her detention is unlawful, and injunctive relief preventing her re-detention absent compliance with constitutional, statutory, and regulatory requirements and a demonstrated significant likelihood of removal in the reasonably foreseeable future.

II. JURISDICTION

8. This Court has jurisdiction over this Petition pursuant to 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and the Suspension Clause, U.S. Const. art. I, § 9, cl. 2.

9. Petitioner challenges only the legality of her current civil immigration detention and conditions of custody, not the validity of the underlying final order of removal. Accordingly, jurisdiction is not barred by 8 U.S.C. § 1252(a)(5) or § 1252(b)(9). *See Jennings v. Rodriguez*, 583 U.S. 281 (2018); *Demore v. Kim*, 538 U.S. 510 (2003).

10. This Court has authority to grant declaratory and injunctive relief under 28 U.S.C. §§ 2201–2202 and its inherent equitable powers.

III. VENUE

11. Venue is proper in this District under 28 U.S.C. § 1391 and 28 U.S.C. § 2241 because Petitioner is detained within this District at the Eloy Federal Contract Facility in Eloy,

Arizona, and at least one Respondent with immediate custody over Petitioner—the Warden—and the relevant ICE Field Office Director, Christopher McGregor, are located within this District.

IV. REQUIREMENTS OF 28 U.S.C. § 2243

12. Petitioner is "in custody" within the meaning of 28 U.S.C. § 2241 because she is detained by ICE at the Eloy Federal Contract Facility under color of federal immigration law.

13. There is no plain, speedy, and adequate remedy at law other than habeas corpus. A petition for review in the court of appeals cannot redress the unlawful nature of her current detention, as such proceedings are confined to review of the removal order itself.

14. Under 28 U.S.C. § 2243, the Court must "forthwith award the writ or issue an order directing the respondent to show cause why the writ should not be granted, unless it appears from the application that the applicant or person is not entitled thereto."

15. Petitioner has exhausted, or is excused from exhausting, any administrative custody review procedures. Respondents have failed to provide meaningful, timely, or regulation-compliant post-order custody reviews or decisions explaining the basis for her re-detention and continued confinement.

V. PARTIES

16. Petitioner, Fatou Toure, is a native and citizen of Senegal, A-Number [redacted] She has lived in the United States since August 8, 1998. She is the mother of U.S. citizen daughters, including at least one child with significant medical needs. She is currently detained at the Eloy Federal Contract Facility in Eloy, Arizona.

17. Respondent Markwayne Mullin is the Secretary of the U.S. Department of Homeland Security and is responsible for the administration and enforcement of the immigration laws, including the detention and removal of noncitizens. He is sued in his official capacity.

18. Respondent Todd M. Lyons is the Acting Director of U.S. Immigration and Customs Enforcement, the component of DHS responsible for civil immigration detention and removal. He is sued in his official capacity.

19. Respondent Christopher McGregor is the Director of the ICE Phoenix Field Office. He is responsible for ICE operations, including decisions to detain, release, or remove noncitizens, within this jurisdiction. He is sued in his official capacity.

VI. STATEMENT OF FACTS

20. Petitioner entered the United States lawfully on or about August 8, 1998, in B-2 nonimmigrant visitor status.

21. She remained in the United States, established her life here, and gave birth to U.S. citizen daughters. One of her children suffers from serious medical conditions requiring regular treatment and ongoing parental care.

22. DHS placed Petitioner in removal proceedings under section 240 of the Immigration and Nationality Act (INA).

23. In Immigration Court, Petitioner sought asylum, withholding of removal, CAT protection, and cancellation of removal for certain nonpermanent residents, premised in substantial part on:

a. Her fear that her U.S. citizen daughters [redacted] and

b. The exceptional and extremely unusual hardship that her removal would impose on her U.S. citizen children, including the child with serious medical conditions, who rely on her for physical, emotional, and financial support.

24. On January 24, 2017, an Immigration Judge denied all relief and ordered Petitioner removed to Senegal.

25. Petitioner timely appealed the IJ's decision to the BIA.

26. On December 13, 2017, the BIA dismissed Petitioner's appeal and affirmed the IJ's decision. The BIA's decision constituted the final administrative order of removal. See 8 U.S.C. § 1101(a)(47)(B)(i).

27. Petitioner's order of removal thus became administratively final on December 13, 2017, and the 90-day "removal period" under 8 U.S.C. § 1231(a)(1) began on that date.

28. The 90-day removal period expired in or about March 2018. The six-month period recognized by *Zadvydas* as presumptively reasonable for post-order detention expired in or about June 2018.

29. During the pendency of Petitioner's appeal and for a substantial period thereafter, DHS did not detain her. After the order became final, DHS permitted Petitioner to remain in the community and ultimately placed her under an Order of Supervision pursuant to 8 U.S.C. § 1231(a)(3).

30. Petitioner complied with her OSUP conditions, including reporting requirements, and cooperated with ICE. Despite having full legal authority to execute her removal, DHS did not remove her in the years that followed the final order.

31. On or about March 4, 2026, more than eight years after the order became final and long after the statutory removal period and *Zadvydas* presumptive period had elapsed, ICE arrested Petitioner and placed her in custody at the Eloy Federal Contract Facility.

32. There is no evidence that DHS properly terminated Petitioner's OSUP pursuant to applicable regulations. Respondents did not provide Petitioner with written notice of any alleged violation of supervision conditions, any individualized determination that she posed a danger or flight risk, or any explanation of why less restrictive alternatives were inadequate.

33. Petitioner's sudden re-detention caused severe disruption and hardship to her U.S. citizen family, particularly her medically fragile child, who relies on Petitioner as a primary caregiver.

34. On or about April 13–14, 2026, Petitioner, through counsel, filed with the BIA a Motion to Reopen her removal proceedings *sua sponte* based on public-interest and humanitarian grounds, including the approval of a family-based immigrant visa petition on her behalf, the continued and possibly worsened medical condition of her U.S. citizen child, and updated evidence of [redacted]

35. At the same time, Petitioner filed with the BIA an Emergency Motion for Stay of Removal Pending Adjudication of the Motion to Reopen. Filing receipts and stamped submissions from the BIA Clerk's Office confirm these filings.

36. These motions remain pending before the BIA. Their pendency constitutes a significant legal and practical impediment to Petitioner's removal and further undermines any assertion that her removal is significantly likely in the reasonably foreseeable future.

37. Upon information and belief, Respondents have not demonstrated concrete progress in obtaining travel documents from Senegal, scheduling a removal, or otherwise effectuating Petitioner's removal in the many years since her order became final.

38. Petitioner has fully cooperated with ICE, has not obstructed removal, and has presented herself for all required proceedings and check-ins.

39. Since her re-detention, Petitioner has not received a meaningful, individualized custody review compliant with 8 U.S.C. § 1231 and implementing regulations. She has not been provided written custody decisions, notice of the evidence on which any detention decisions were based, or an opportunity to contest the basis for continued detention.

40. There are readily available, less restrictive alternatives to detention—such as reinstatement of her OSUP with reasonable reporting requirements, electronic monitoring, or other conditions—that would address any legitimate governmental interests while avoiding the serious constitutional concerns posed by her current confinement.

VII. PROCEDURAL HISTORY

41. Petitioner entered the United States lawfully on August 8, 1998, in B-2 visitor status.

42. DHS subsequently initiated removal proceedings under INA § 240.

43. In those proceedings, Petitioner applied for asylum, withholding of removal, CAT protection, and cancellation of removal under 8 U.S.C. § 1229b(b), principally on the basis of:

a. The grave risk that her U.S. citizen daughters [redacted] and

b. The exceptional and extremely unusual hardship her removal would cause her U.S. citizen children, including one child with serious medical needs.

44. On January 24, 2017, the Immigration Judge denied all relief and ordered Petitioner removed to Senegal.

45. Petitioner timely appealed to the BIA.

46. On December 13, 2017, the BIA dismissed Petitioner's appeal and affirmed the IJ's decision, thereby making the removal order administratively final. See 8 U.S.C. § 1101(a)(47)(B)(i).

47. The statutory 90-day removal period under 8 U.S.C. § 1231(a)(1) began on or about December 13, 2017, and expired in or about March 2018. The presumptively reasonable six-month period for post-order detention described in *Zadvydas* expired in or about June 2018.

48. During and after these periods, DHS did not remove Petitioner. Instead, DHS released her under an OSUP under 8 U.S.C. § 1231(a)(3). Petitioner complied with the conditions of supervision and maintained consistent contact with ICE.

49. On March 4, 2026, ICE arrested Petitioner and placed her in detention at the Eloy Federal Contract Facility. No contemporaneous written decision terminating her OSUP or explaining the justification for her re-detention was provided.

50. On or about April 13–14, 2026, Petitioner filed a Motion to Reopen her removal proceedings and an Emergency Motion for Stay of Removal with the BIA. Those motions remain pending.

51. Petitioner now files this Petition for Writ of Habeas Corpus and Complaint for Declaratory and Injunctive Relief in this Court, challenging only the legality of her current detention and the procedures by which Respondents revoked or disregarded her OSUP, while leaving

intact the underlying removal order, which remains within the jurisdiction of the BIA and, if appealed, the appropriate court of appeals.

VIII. LEGAL FRAMEWORK

A. Statutory Framework – 8 U.S.C. § 1231

52. 8 U.S.C. § 1231 governs the detention and removal of noncitizens subject to final orders of removal.

53. Under 8 U.S.C. § 1231(a)(1), following the entry of a final order of removal, DHS "shall remove the alien from the United States within a period of 90 days" (the "removal period"). During this period, detention is generally mandatory. 8 U.S.C. § 1231(a)(2).

54. The "removal period" typically begins on "the date the order of removal becomes administratively final." 8 U.S.C. § 1231(a)(1)(B)(i). No statutory provision authorizes DHS to restart the removal period years later by re-detaining a person whose order has long been final.

55. After the 90-day removal period has elapsed, 8 U.S.C. § 1231(a)(6) provides that certain categories of noncitizens "may be detained beyond the removal period" or released under conditions of supervision. This provision is permissive and must be construed to avoid unconstitutional indefinite detention.

56. In *Zadvydas v. Davis,* 533 U.S. 678 (2001), the Supreme Court interpreted § 1231(a)(6) to permit detention only "for a period reasonably necessary to secure removal," not indefinite or potentially permanent detention. Id. at 699–700.

57. Zadvydas established a presumptively reasonable period of six months of post-order detention. After six months, once a noncitizen shows "good reason to believe that there is

no significant likelihood of removal in the reasonably foreseeable future," the burden shifts to the Government to "respond with evidence sufficient to rebut that showing." Id. at 701.

58. Here, Petitioner's removal period began when her order became administratively final on December 13, 2017. The 90-day statutory period and the six-month *Zadvydas* presumptive period expired years before her re-detention in March 2026. Respondents cannot legitimately restart those clocks by re-arresting her long after the order became final.

B. Standard of Review

59. A petition for writ of habeas corpus under 28 U.S.C. § 2241 is the appropriate vehicle to challenge the legality of civil immigration detention. *See Demore v. Kim,* 538 U.S. 510 (2003); *Jennings v. Rodriguez*, 583 U.S. 281 (2018).

60. This Court reviews de novo Petitioner's legal challenges to her detention, including the interpretation of 8 U.S.C. § 1231(a)(1) and (a)(6) and their interaction with the Due Process Clause as construed in *Zadvydas.*

61. The Court also reviews de novo whether Respondents complied with mandatory statutory and regulatory procedures governing OSUPs, termination of supervised release, and post-order custody reviews, as required by the Accardi doctrine.

62. To the extent there are disputed jurisdictional or material facts necessary to resolve the legality of Petitioner's detention, the Court may consider evidence beyond the pleadings and, if appropriate, hold an evidentiary hearing. See 28 U.S.C. § 2243 (the court shall "summarily hear and determine the facts, and dispose of the matter as law and justice require").

63. Under *Zadvydas,* once a noncitizen detained under § 1231(a)(6) presents good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable

future, the burden shifts to the Government to rebut that showing with evidence. 533 U.S. at 701.

64. In assessing whether the Government has met its burden, courts consider the totality of circumstances, including:

a. The length of time since the removal order became administratively final;

b. The duration and history of detention and/or supervised release;

c. The Government's efforts or lack of efforts to secure travel documents and execute removal;

d. Legal impediments to removal, such as pending motions to reopen or stays of removal; and

e. Evidence regarding the receiving country's actual practice in accepting or refusing repatriation of the person at issue.

65. Due process and Accardi-based claims are also reviewed de novo. The Court determines whether Respondents' actions were arbitrary, capricious, or contrary to law, and whether they complied with 8 U.S.C. §§ 1231 and 1232, 8 C.F.R. §§ 241.4, 241.5, 241.13, and 1208.31(g), and the Constitution.

66. In considering Petitioner's requests for declaratory and injunctive relief ancillary to habeas, the Court exercises its equitable authority consistent with 28 U.S.C. §§ 2201–2202, guided by the irreparable harm arising from unlawful detention and the public interest in lawful, non-arbitrary immigration detention practices.

IX. CLAIM ONE – UNLAWFUL DETENTION UNDER 8 U.S.C. § 1231 AND ZADVYDAS

67. Petitioner realleges and incorporates by reference paragraphs 1 through 67 as though fully set forth herein.

68. Petitioner is subject to a final order of removal that became administratively final on December 13, 2017. The statutory 90-day removal period under 8 U.S.C. § 1231(a)(1) expired in March 2018, and the six-month presumptively reasonable *Zadvydas* period expired in June 2018.

69. Detention after the 90-day removal period is governed by 8 U.S.C. § 1231(a)(6) and is constitutionally permissible only as long as it is reasonably necessary to effectuate removal. *Zadvydas*, 533 U.S. at 699–700.

70. Petitioner's re-detention in March 2026 occurred long after these periods had elapsed. Respondents cannot lawfully restart either the statutory removal period or the *Zadvydas* presumption simply by re-detaining her many years after the order became final.

71. Given the extensive passage of time since her order became final, DHS's failure to remove her during those years, the pendency of a Motion to Reopen and Emergency Motion for Stay of Removal before the BIA, and the absence of evidence of concrete removal efforts, Petitioner has shown good reason to believe that there is no significant likelihood of her removal in the reasonably foreseeable future.

72. The Government may argue that Petitioner's habeas claim is premature because her current period of physical custody began less than 90 days ago (on March 4, 2026), and that § 1231(a)(2) requires detention during a 90-day removal period. This position is legally flawed because:

a. The "removal period" is defined by statute as beginning when the order becomes administratively final. 8 U.S.C. § 1231(a)(1)(B)(i). That occurred in December 2017.

b. There is no statutory support for resetting the removal period based on later re-detention. To allow such a reset would permit the very indefinite detention that Zadvydas construes § 1231(a)(6) to avoid.

c. *Zadvydas's* six-month presumption is not a jurisdictional bar to judicial review but a guideline tied to the overall reasonableness of post-order detention. In light of the years elapsed since the final order and the Government's failure to effect removal, Petitioner's challenge is ripe notwithstanding the relatively recent date of her re-detention.

73. The Government may also contend that removal is reasonably foreseeable because Senegal generally accepts its nationals and ICE has "shown" that removal is likely. That contention fails because:

a. Any presumption that removal is reasonably foreseeable is rebuttable. Here, more than eight years of non-removal despite a final order, combined with the pending motion to reopen and stay, rebut such a presumption.

b. If removal to Senegal were truly straightforward, DHS could have executed the order years ago during the period Petitioner was under supervision.

c. Respondents have not produced evidence of concrete steps toward removal, such as confirmed travel document issuance, scheduled removal flights, or a firm removal date.

74. Because Respondents have not met their burden under *Zadvydas* to prove that there is a significant likelihood of Petitioner's removal in the reasonably foreseeable future, her continued detention is not reasonably related to the legitimate purpose of effectuating removal and is unlawful under § 1231(a)(6) as construed by *Zadvydas*.

75. Petitioner is therefore entitled to immediate release from custody under reasonable conditions of supervision or other appropriate terms.

X. CLAIM TWO – DUE PROCESS, 8 U.S.C. § 1231 AND § 1232, AND THE ACCARDI DOCTRINE (UNLAWFUL REVOCATION OF ORDER OF SUPERVISION AND CONTINUED DETENTION)

76. Petitioner realleges and incorporates by reference paragraphs 1 through 75 as though fully set forth herein.

77. The Due Process Clause of the Fifth Amendment protects all persons in the United States, including noncitizens, from arbitrary deprivation of liberty and requires that detention be accompanied by fair procedures, including notice and an opportunity to be heard.

78. Under 8 U.S.C. § 1231(a)(3), DHS may release a noncitizen subject to a final order under conditions of supervision. DHS's regulations— including 8 C.F.R. §§ 241.4, 241.5, and 241.13—set forth procedures governing supervision, custody review, and revocation of supervised release.

79. Under the Accardi doctrine, agencies must follow their own binding regulations, particularly those designed to protect the interests of individuals subject to their authority. *United States ex rel. Accardi v. Shaughnessy*, 347 U.S. 260 (1954).

80. DHS placed Petitioner under an OSUP after the 90-day removal period expired, thereby subjecting decisions about her continued liberty and potential re-detention to the procedures and standards set forth in its regulations.

81. Respondents revoked, or effectively disregarded, Petitioner's OSUP and re-detained her without following these required procedures. Specifically, upon information and belief, Respondents:

a. Failed to provide Petitioner with written notice of any alleged violations of supervision conditions or other grounds for revoking her OSUP;

b. Failed to conduct a meaningful, individualized custody review addressing public-safety and flight-risk factors in light of her long residence, deep family ties, medical hardship in the family, and history of compliance;

c. Failed to consider whether less restrictive alternatives to detention, such as continued supervision, reporting requirements, or monitoring, could adequately protect any legitimate government interests; and

d. Failed to provide Petitioner with written decisions explaining the basis for her re-detention and continued confinement, or to give her an opportunity to respond.

82. By failing to follow their own regulations governing supervision and custody review, Respondents violated the Accardi doctrine and acted arbitrarily and capriciously.

83. In addition, 8 U.S.C. § 1232 and regulations such as 8 C.F.R. § 1208.31(g) reflect Congress's and the Executive's obligation to consider the safety and best interests of children, including U.S. citizen children, and to ensure that individuals who fear persecution or torture in a third country receive appropriate screening. Respondents have not demonstrated compliance with these obligations in connection with Petitioner's detention and potential removal, despite the serious risk of [redacted] U.S. citizen daughters.

84. Respondents' revocation of Petitioner's OSUP and her continued detention, without adequate process and in disregard of mandatory regulations, violate both substantive and procedural due process.

85. As a result of these violations, Petitioner is entitled to immediate release, as well as declaratory and injunctive relief ensuring that Respondents may not again detain her under § 1231(a)(6) without: (a) full compliance with statutory and regulatory procedures governing custody decisions; and (b) a showing, supported by evidence, that there is a significant likelihood of removal in the reasonably foreseeable future.

XI. PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Assume jurisdiction over this action;
2. Issue a writ of habeas corpus under 28 U.S.C. § 2241 ordering Respondents to immediately release Petitioner from ICE custody under reasonable conditions of supervision or such other terms as the Court deems appropriate;
3. Declare that Respondents' continued detention of Petitioner under 8 U.S.C. § 1231(a)(6), in light of *Zadvydas,* violates the Due Process Clause of the Fifth Amendment because Respondents have failed to demonstrate a significant likelihood of removal in the reasonably foreseeable future;
4. Declare that Respondents violated 8 U.S.C. § 1231, 8 U.S.C. § 1232, and their implementing regulations, including but not limited to 8 C.F.R. §§ 241.4, 241.5, 241.13, and 1208.31(g), and the Accardi doctrine, by revoking or disregarding Petitioner's OSUP and detaining her without following the required procedures;
5. Enter a permanent injunction preventing Respondents from detaining Petitioner again under 8 U.S.C. § 1231(a)(6) unless and until they can:

a. Demonstrate to this Court a significant likelihood of Petitioner's removal in the reasonably foreseeable future; and

b. Show full compliance with all statutory and regulatory requirements governing custody, supervision, and any attempt to remove her, including to any third country;

6. Order Respondents to provide to the Court and to Petitioner's counsel, within a time specified by the Court:

a. A complete copy of Petitioner's order of removal and any subsequent decisions affecting that order;

b. The dates and results of all post-order custody reviews, including any written decisions, risk assessments, and explanations for continued detention or revocation of supervision;

c. The dates on which ICE has requested travel documents for Petitioner since the final order of removal, all correspondence with the Senegalese government or any other country regarding such requests, and any responses received, including any denials or failures to respond;

7. Order Respondents to certify and demonstrate their compliance with 8 U.S.C. § 1232 and 8 C.F.R. § 1208.31(g), as applicable, including any steps taken to assess and protect the interests of Petitioner's U.S. citizen daughters and to mitigate the risk that they will be exposed to FGM or other serious harm;

8. Award Petitioner reasonable attorneys' fees and costs under the Equal Access to Justice Act, 28 U.S.C. § 2412, and any other applicable authority, if appropriate; and

9. Grant such other and further relief as the Court deems just and proper.

Respectfully submitted,

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Attorney for Petitioner

Dated: April 23, 2026

VERIFICATION PURSUANT TO 28 U.S.C. § 2242

I represent Petitioner, Ms. Fatou Toure, and submit this verification on his behalf. I hereby verify that the factual statements made in the foregoing Petition for Writ of Habeas Corpus are true and correct to the best of my knowledge.

Dated this 23rd day of April, 2026.

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