

FILED

APR 28 2026

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY 003 DEPUTY

Patrick Abien Ozeji

NAME

PRISON NUMBER

Imperial Regional Detention Facility

PLACE OF CONFINEMENT

1572 Gateway Rd

ADDRESS

Calexico, California 92231

**United States District Court
Southern District Of California**

Patrick Abien Ozeji

(FULL NAME OF PETITIONER)

Petitioner

Civil No. '26CV2698 JO JLB

(TO BE FILLED IN BY CLERK OF U.S. DISTRICT COURT)

v.
Warden Jeremy Casey

(NAME OF WARDEN, SUPERINTENDENT, JAILOR, OR AUTHORIZED
PERSON HAVING CUSTODY OF PETITIONER, E.G. PAROLE OFFICER)

Respondent

PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

and
The Attorney General of the State of
California, Additional Respondent.

1. 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 or case number (if you know): _____

(c) Date of sentencing: _____

☒ Being held on immigration charge

☐ Other (explain): _____

2. Are you currently being held on orders by:

☒ Federal authorities ☐ State authorities ☐ Other - explain:
Immigration Detention

3. What are you challenging in this petition:

- ☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities
☐ Pretrial detention
☐ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed
☐ Disciplinary proceedings
☐ Other (specify): _____

4. Provide more information about the decision or action you are challenging:

(a) Name and location of the court or agency: Imperial Immigration Court
2409 La Brucherie road, Imperial, Ca 92251

(b) Case number, docket number or opinion number (if you know): _____

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

(d) Date of the decision or action: 1/23/2026 (see Exhibit A)

5. Did you **appeal** the decision, file a grievance or seek an administrative remedy?

☐ Yes ☒ No

(a) If your answer to 5 was "Yes," give the following information:

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

(2) Date of filing: _____

(3) Case number, docket number or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If your answer to 5 was "No," explain why you did not appeal:

I am challenging the constitutionality of my detention therefore I am entitled to a judicial review in a habeas court.

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

☐ Yes ☒ No

(a) If your answer to 6 was "Yes," give the following information:

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

(2) Date of filing: _____

(3) Case number, docket number or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If your answer to 5 was "No," explain why you did not appeal:

The Judge did not have jurisdiction because it states that on the order. It would be futile

7. After the second appeal, did you file a **third appeal** to a higher authority, agency or court?

☐ Yes ☒ No

(a) If your answer to 7 was "Yes," give the following information:

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

(2) Date of filing: _____

(3) Case number, docket number or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If your answer to 7 was "No," explain why you did not appeal:

I am challenging
the constitutionality of my detention, therefore
I am entitled to judicial review in a habeas court

8. State *concisely* every ground on which you claim that you are being held in violation of the constitution, law or treaties of the United States. Summarize *briefly* the facts supporting each ground. If necessary, you may attach pages stating additional grounds and facts supporting same.

CAUTION: In order to proceed in the federal court, you must ordinarily first exhaust your
available court remedies as to each ground on which you request action by the
federal court. Moreover, if you fail to set forth all grounds in this petition, you may
be barred from presenting additional grounds at a later date.

You should raise in this petition *all* available grounds on which you base your allegations that you are being held in custody unlawfully.

GROUND ONE: I have been detained for over
12 months

(a) Supporting FACTS (state *briefly* without citing cases or law)

The approach adopted by the United States
Court of Appeals for the Ninth Circuit is
to apply a bright-line rule to cases of
mandatory detention authority which is
limited to a 6-months period, subject to
a finding of flight risk or dangerousness.

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

☐ Yes ☒ No

GROUND TWO: I am not a flight risk or danger to
the Society

(a) Supporting FACTS (state *briefly* without citing cases or law):

I have a sponsor who will ensure that
I will attend all my Immigration Court
hearings and is a lawfully abiding
person who has been here for a long
time in the United States

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

☐ Yes ☒ No

GROUND THREE: The Conditions of Confinement
resemble penal confinement

(a) Supporting FACTS (state *briefly* without citing cases or law):

I have had a cruel and inhumane
experience while being detained here at
Imperial detention. I have been unable to
communicate with my family. We are
restricted to confined areas during
recreation outdoors and most of the
days locked up in dorms

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

☐ Yes ☒ No

GROUND FOUR: There is no significant likelihood
of my removal in the future

(a) **Supporting FACTS** (state *briefly* without citing cases or law): I currently
have an appeal pending. In the event
of an adverse decision I will seek
appellate review in the Ninth Circuit. All
told this process might take two years
or longer causing further prolonged
detention. I was arrested and detained
at the border of Calexico on 1/11/2025.
I have been detained in Imperial detention
facility for over 15 months now. I received
a final hearing on November 19th 2026
where my Asylum, CAT & withholding
applications were denied. I filed an appeal
on April 19th December 19th 2026. My
appeal is currently pending and no
briefing schedule has been issued. I
anticipate a ruling perhaps in a year or
so and I intend to appeal to the Ninth Circuit
if the decision is adverse. In total I anticipate
this process will take 2 years.

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

☐ Yes ☒ No

9. If any of the grounds listed in 4A, B, C, and D were not previously presented in any other court, state or federal, state briefly what grounds were not presented, and give your reasons for not presenting

them:

There has been no reason for presenting
these grounds in federal or state court

10. Do you have any petition or appeal now pending in any court, either state or federal, as to the execution of sentence under attack?

☐ Yes ☒ No

11. Give the name and address, if known, of each attorney who represented you in the following stages of the execution of sentence attacked herein:

(a) In any post-conviction proceeding

N/A

(b) On appeal from any adverse ruling in a post-conviction proceeding

N/A

Wherefore, petitioner prays that the Court grant petitioner relief to which he may be entitled in this proceeding.

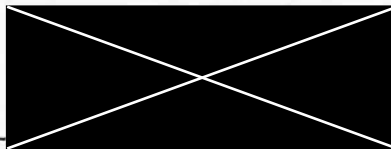
I am seeking immediate release or a bond in front of an immigration judge.

SIGNATURE OF ATTORNEY (IF ANY)

I declare under penalty of perjury that the foregoing is true and correct. Executed on

4/23/2026

(DATE)



SIGNATURE OF PETITIONER