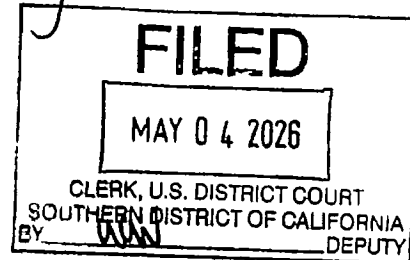


Abdoul Rahimy Bah
NAME Imperial Regional Detention Facility
PRISON NUMBER [REDACTED]
1572 Gateway Rd
PLACE OF CONFINEMENT
Calveras, Ca 92231
ADDRESS



United States District Court
Southern District Of California

Abdoul Rahimy Bah
(FULL NAME OF PETITIONER)
Petitioner

Civil No. '26CV2894 JLS BJW
(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:

DHS

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:

Immigration Court in Imperial
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:

March 23, 2026

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: _____

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: _____

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 filed a motion to enforce with the 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 being detained for over six months. Courts in the Ninth Circuits have recognized the six-month bright line rule

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

I have been currently detained for over 15 months with no bond hearing. Courts in this circuit have recognized a six-month "presumptively reasonable period of detention" after which the alien is eligible for conditional release if he can demonstrate that there is no significant likelihood of removal in the reasonable foreseeable future.
Clark v. Martinez, 543 U.S. 371, 378, 125 S.Ct. 716, 160 L.Ed. 2d 734 (2005) (quoting Zadvydas, 533 U.S. at 701)

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

☐ Yes ☒ No

GROUND TWO: The Conditions of Confinement

(a) Supporting FACTS (state briefly without citing cases or law): The Condition
Of my Confinement has been affecting
me mentally, emotionally and psychologically.
Most times, I am deeply depressed as I
have been unable to communicate with
my family back home. I experience
Shoulder pains and the doctor says I
need to undergo surgery. I was shot by
the police in Guinea in my arm hence
the excruciating pain that I am currently
experiencing. I am indoors for most of the
day and the only time I go outside for
recreation, we are confined within a
barbed-wired restricted zone and being
watched by Correctional officers. My
detention here resembles penal custody.

(See Exhibit A) - medical records for
my shoulder

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

☐ Yes ☒ No

GROUND THREE: My detention has become unconstitutionally prolonged and violates the fifth amendment of the Constitution

(a) **Supporting FACTS** (state briefly without citing cases or law): My detention is unconstitutionally prolonged. It is well-settled that the fifth Amendment entitles aliens to due process in deportation proceedings. The due process Clause applies to all persons within the United States, including aliens whether their presence here, lawful, unlawful, temporary or permanent. Justice Kennedy explained in *Demore* that, were there to be an unreasonable delay by the Immigration and Naturalization Service in pursuing and completing deportation proceedings, it could become necessary then to inquire whether the detention is not to facilitate deportation or to protect against risk of flight or dangerousness but to incarcerate for other reasons.

(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 release from detention in the
near future.

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

After over 16 months and several court
proceedings, the Immigration Judge ordered
my removal on 8/19/2025. I am currently
awaiting a decision on my appeal which
has been fully briefed. In the event that
I receive an adverse decision, I can appeal
to the Ninth Circuit which could result in
further prolonged detention that could stretch
to over a year or more.

(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:

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 _____

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

Wherefore, petitioner prays that the Court grant petitioner relief to which he may be entitled in this proceeding. I pray that this Court grant my release or

in the alternative provide me with a bond hearing.

SIGNATURE OF ATTORNEY (IF ANY)

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

05-01-2026
(DATE)



SIGNATURE OF PETITIONER