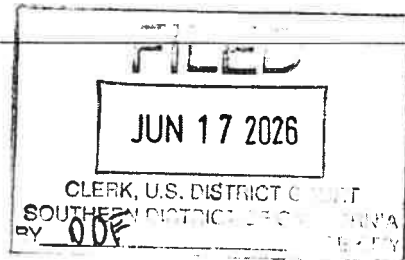


Ayouba Camara
NAME

PRISON NUMBER

Imperial Regional Detention Facility
PLACE OF CONFINEMENT

1572 Gateway Rd, Calexico, CA 92231
ADDRESS



United States District Court
Southern District Of California

Ayouba Camara
(FULL NAME OF PETITIONER)

Petitioner

v.

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

Respondent

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

Civil No. '26CV3603 LL MMP
(TO BE FILLED IN BY CLERK OF U.S. DISTRICT COURT)

PETITION FOR WRIT OF HABEAS CORPUS

UNDER 28 U.S.C. § 2241

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 / 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 Rd, 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): ICE Redetermination Custody

(d) Date of the decision or action:

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: Neither the Immigration Court nor the BIA can consider constitutional questions, therefore appealing my detention when they do not have jurisdiction will be futile

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 6 was "No," explain why you did not appeal: I did not appeal because the Judge ruled that he did not have jurisdiction

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:

because the Immigration Judge ruled that he did not. I did not appeal

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 six (6) months. The presumed limit for unlawful detention in this circuit. In total, I have been detained for over 16 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 where the Government's statutory mandatory detention authority is limited to a six month period, subject to a finding of flight risk or dangerousness.

I have been detained for over 16 months as I crossed the border near Calexico on 12/20/2024 and I have been detained since then.

I have also sent a request of release to the Warden and the Immigration Custody on 4/9/2026 but no responses since then (see attached Exhibit A)

(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 a 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 of my Immigration Court hearings and is lawfully abiding citizen of the United States. She is my aunt who has been here for a long time. She is willing to accomodate me throughout my Immigration Court proceedings. She will take care of me, support me and provide all necessities if I have been released from custody.

(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 United States Constitution

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

It is well-settled that the fifth Amendment entitles aliens to due process in deportation proceedings. The due process clause applies to all person within the United States, including aliens whether their presence here is lawful, unlawful, temporary or permanent. More than a decade ago, in the *Zadvydas* decision the United States Supreme Court signaled its concerns about the constitutionality of a statutory scheme that ostensibly authorized indefinite detention of non-citizens. Two years later, when the court upheld the constitutionality of 8 U.S.C. § 1226(d) in the *Demore* decision it emphasized that, for detention under the statute to be reasonable, it must be for a brief period of time. Justice Kennedy explained in his concurrence in the *Demore* decision 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): The duration of my current detention has been unreasonably prolonged and there is a reason to anticipate significant future detention during my Immigration proceedings. I have been detained for over 16 months. While I did receive an adverse decision from the BIA, I have filed an appeal with the 9th Circuit. I will subsequently send proof of these documents to this Court for filing in conjunction with this instant petition. The process in the Ninth Circuit will likely take a year or more before this process comes to an end. During this period prolonged detention will have adverse effect on my health, psychological and my mental wellbeing. Most times I get depressed because I have been separated from my loved ones. We are restricted to outdoor spaces, forbidden to use internet and cannot connect with my family. I could not even sleep and I have been caught off from the rest of the world. Suffice it to say, my detention here resembles penal confinement.

(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:

None of these grounds were presented to any State or federal Court. Petitioner is presenting these grounds for the first time.

GROUND FIVE (Petitioner is not subject to mandatory detention pursuant to 8 U.S.C. 1231(a)(2)(B))

Petitioner respectfully through the foregoing advances new arguments in support of his habeas petition. The initial habeas action Case No. 26-cv-02782-RSH-MSB (S.D. Cal. filed April.30,2026 was denied on May 22,2026. The order explained that Petitioner's order of removal became final on May 4,2026 when the Board of Immigration Appeals dismissed Petitioner's appeal.

Therefore, the order noted that Petitioner is currently within the 90-day 'removal period', following the date his order of removal became administratively final, and as such he is subject to mandatory detention pursuant to 8 U.S.C. 1231 (a)(2)(b)". id Shortly after this order was issued, Petitioner filed another action which was summarily dismissed, See Case no 26-cv-3419-BAS-GC, decided on June 9,2026. On 06/01/2026,

Petitioner signed and mailed this second habeas petitioner to the Southern District of California. Petitioner also sent a petition to the Ninth Circuit Court of Appeals to challenge the adverse decision of the BIA. Petitioner had anticipated a situation where upon filing a petition in the Ninth circuit, Petitioner would receive a receipt and then subsequently send the receipt as proof to this Court in respect to the second habeas. However, as events played out, an order was already issued on 06/09/2026 and so Petitioner is submitting this

to this 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.

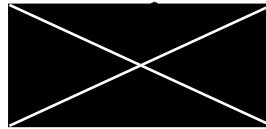
Specifically, petitioner seeks release from the Court or alternatively a bond hearing in front of the Immigration Judge

SIGNATURE OF ATTORNEY (IF ANY)

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

6/9/2026

(DATE)



SIGNATURE OF PETITIONER