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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
ALBANY DIVISION

LOUKENS JEUNE, Petitioner, v. WARDEN, Irwin County Detention Center; FIELD OFFICE DIRECTOR, Atlanta Field Office, U.S. Immigration and Customs Enforcement; MARKWAYNE MULLIN, Secretary of the U.S. Department of Homeland Security; and TODD BLANCHE, Acting Attorney General of the United States, in their official capacities, Respondents.	)))Case No.: _____))PETITION FOR WRIT OF)HABEAS CORPUS))28 U.S.C. § 2241))))))))

PETITION FOR WRIT OF HABEAS CORPUS

INTRODUCTION

1. Petitioner LOUKENS JEUNE, a native and citizen of Haiti, brings this Petition for Writ of Habeas Corpus under 28 U.S.C. § 2241 to challenge his unlawful civil immigration detention at the Irwin County Detention Center in Ocilla, Georgia. Petitioner was lawfully paroled into the United States on February 25, 2023, resided peacefully in Orlando, Florida for over three years, and filed a timely application for asylum on September 11, 2023. On March 7, 2026 — three years after his lawful parole — U.S. Immigration and Customs Enforcement ("ICE") arrested Petitioner in the interior of the United States and transferred him to the Stewart

Detention Center in Lumpkin, Georgia. On June 18, 2026, ICE transferred Petitioner a second time, to the Irwin County Detention Center in Ocilla, Georgia, where he remains in custody as of the date of this Petition. Petitioner has now been held continuously by ICE for more than 110 days, across two transfers between detention facilities, without ever being afforded a bond hearing, a custody review, or any individualized determination of whether his confinement is justified by flight risk or danger. ICE asserts authority over Petitioner under 8 U.S.C. § 1225(b)(2)(A), which mandates the detention of certain "applicants for admission" without the possibility of bond.

2. ICE has misclassified Petitioner. Binding Eleventh Circuit precedent — issued just weeks ago in Hernandez Alvarez v. Warden, Federal Detention Center Miami, Nos. 25-14065/14075, 2026 WL 1243395 (11th Cir. May 6, 2026) — holds that 8 U.S.C. § 1225(b)(2)(A) applies to arriving aliens seeking entry at the border, whereas 8 U.S.C. § 1226 applies to aliens unlawfully in the interior of the United States. Petitioner is not seeking entry at the border. He is not at a port of entry. He has not been at a port of entry since February 25, 2023. He was arrested by ICE in the interior, more than three years after his lawful parole, while he was in the middle of pursuing his asylum claim before the Lumpkin Immigration Court. He is, as a matter of binding Eleventh Circuit law, detained pursuant to 8 U.S.C. § 1226(a).

3. Under 8 U.S.C. § 1226(a), Petitioner is entitled to a bond hearing before an immigration judge. ICE has refused to provide one because it asserts that 8 U.S.C. § 1225(b)(2)(A) applies. That position is foreclosed by binding precedent. Hernandez Alvarez, 2026 WL 1243395, at *14. The Immigration Court at Lumpkin lacks jurisdiction to set bond under existing administrative rules so long as ICE classifies Petitioner under § 1225(b)(2)(A). See 8 C.F.R. § 1003.19(h)(2)(i)(B). The only forum in which Petitioner can correct ICE's

statutory misclassification and obtain the bond hearing to which he is legally entitled is this Court.

4. Petitioner does not seek immediate release from this Court. He asks this Court to declare that he is detained pursuant to 8 U.S.C. § 1226(a) — not 8 U.S.C. § 1225(b)(2)(A) — and to order Respondents either to provide him with an individualized bond hearing before an immigration judge within fourteen days, or to release him from custody. This is the precise remedy other federal district courts in this Circuit have granted in materially identical cases following Hernandez Alvarez. See, e.g., Batista Perez v. Venturella, No. 3:26-cv-00543-JEP-SJH (M.D. Fla. May 22, 2026) (granting habeas, ordering Respondents either to provide a § 1226(a) bond hearing within seven days or release the petitioner).

JURISDICTION

5. This action arises under the Constitution of the United States and the Immigration and Nationality Act, 8 U.S.C. § 1101 et seq.

6. This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United States Constitution (Suspension Clause). The jurisdiction-stripping provisions of 8 U.S.C. § 1252 do not bar this Petition because Petitioner challenges the statutory authority for his detention, not his order of removal. See Demore v. Kim, 538 U.S. 510, 516–17 (2003); Zadvydas v. Davis, 533 U.S. 678, 687–88 (2001); Hernandez Alvarez, 2026 WL 1243395, at *5–6 (confirming district court habeas jurisdiction over statutory classification challenges to immigration detention).

7. This Court may grant relief under the habeas corpus statutes, 28 U.S.C. § 2241 et seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All Writs Act, 28 U.S.C. § 1651.

VENUE

8. Venue is proper in the Middle District of Georgia, Albany Division, because Petitioner is detained at the Irwin County Detention Center, 132 Cotton Drive, Ocilla, Georgia 31774, which is within the territorial jurisdiction of this District and Division. See M.D. Ga. L.R. 3.4 (Albany Division covers Irwin County). The Warden of the Irwin County Detention Center, as Petitioner's immediate physical custodian, is the proper primary respondent under Rumsfeld v. Padilla, 542 U.S. 426, 434–47 (2004).

9. Venue is also proper because Respondents are officers, employees, or agencies of the United States, Respondent Warden of the Irwin County Detention Center resides in this District, a substantial part of the events and omissions giving rise to Petitioner's claims occurred in this District, and no real property is involved in this action. 28 U.S.C. § 1391(e).

REQUIREMENTS OF 28 U.S.C. § 2243

10. The Court must grant the petition for writ of habeas corpus or issue an order to show cause to 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.

11. Courts have long recognized the urgency of habeas review. The Great Writ is "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). Where, as here, a person is held in civil detention pursuant to a statutory provision binding Circuit precedent has held does not authorize his confinement, the urgency of habeas review is at its zenith.

PARTIES

12. Petitioner LOUKENS JEUNE is a 37-year-old native and citizen of Haiti who is currently detained by ICE at the Irwin County Detention Center in Ocilla, Georgia. He was originally detained by ICE on March 7, 2026, at the Stewart Detention Center in Lumpkin, Georgia, and was transferred to the Irwin County Detention Center on June 18, 2026. He has remained in continuous ICE custody throughout this period. He is the father of four children, including a United States citizen child born during his time in the United States. He has a pending application for asylum, withholding of removal, and protection under the Convention Against Torture that has been on file with the Lumpkin Immigration Court since September 11, 2023, and was amended on May 5, 2026. He has no criminal history of any kind in the United States or in any other country.

13. Respondent Warden of the Irwin County Detention Center is sued in his or her official capacity. The Warden has immediate physical custody of Petitioner pursuant to the facility's contract with U.S. Immigration and Customs Enforcement to detain noncitizens, and is a legal custodian of Petitioner. The Warden is the proper primary respondent under Rumsfeld v. Padilla, 542 U.S. 426 (2004).

14. Respondent Field Office Director, Atlanta Field Office, U.S. Immigration and Customs Enforcement, is sued in his or her official capacity. The Field Office Director has

authority over the detention and release of noncitizens at the Irwin County Detention Center and is a legal custodian of Petitioner with authority to release him.

15. Respondent Markwayne Mullin is sued in his official capacity as the Secretary of the U.S. Department of Homeland Security. In this capacity, Respondent Mullin is responsible for the implementation and enforcement of the Immigration and Nationality Act and oversees U.S. Immigration and Customs Enforcement, the component agency responsible for Petitioner's detention. Respondent Mullin is a legal custodian of Petitioner.

16. Respondent Todd Blanche is sued in his official capacity as the Acting Attorney General of the United States and the senior official of the U.S. Department of Justice. In that capacity, Respondent Blanche has the authority to adjudicate removal cases and to oversee the Executive Office for Immigration Review, which administers the immigration courts and the Board of Immigration Appeals. Respondent Blanche is a legal custodian of Petitioner.

STATEMENT OF FACTS

A. Petitioner's Lawful Parole into the United States

17. Petitioner Loukens Jeune was born on [redacted], in Marchand-Dessalines, Artibonite Department, Haiti. He is a native and citizen of Haiti. His native language is Haitian Creole.

18. On February 25, 2023, Petitioner was lawfully paroled into the United States by U.S. Customs and Border Protection at the San Ysidro, California port of entry. Petitioner was paroled on humanitarian grounds pursuant to INA § 212(d)(5)(A), 8 U.S.C. § 1182(d)(5)(A), and was released into the United States with affirmative authorization to remain pending adjudication of his immigration status.

19. Petitioner traveled from California to Orlando, Florida, where he established his residence at [redacted]. He has lived at this address continuously since 2023. He has not departed the United States since his parole in February 2023.

20. On September 11, 2023 — within seven months of his lawful parole, and well within the one-year asylum filing deadline of INA § 208(a)(2)(B) — Petitioner filed a Form I-589, Application for Asylum and for Withholding of Removal. His application has been pending before EOIR continuously since that date.

B. Petitioner's Three Years of Lawful and Compliant Residence in the Interior

21. From February 25, 2023 until March 7, 2026 — a period of over three years — Petitioner resided continuously in the interior of the United States. He lived openly at the same address in Orlando. He worked to support himself and his family. He fathered a United States citizen child. He paid taxes. He complied with every reporting obligation imposed on him by the federal government.

22. During this three-year period, Petitioner did not depart the United States. He did not attempt to depart the United States. He did not present himself at any port of entry, attempt to apply for any visa or admission document, or take any action that could be characterized as "seeking admission" to the United States. He simply lived in Orlando, raised his family, worked, and waited for his asylum claim to be adjudicated.

23. Petitioner has no criminal history of any kind. He has never been arrested, charged, convicted, or sentenced for any offense in the United States, in Haiti, in Chile, or in any other country. He has never failed to appear at any required immigration appointment, hearing, or interview.

C. ICE's Interior Arrest and Mandatory-Detention Misclassification

24. On December 8, 2025 — nearly three years after Petitioner had been paroled into the United States — the Department of Homeland Security issued a Notice to Appear ("NTA") charging Petitioner with inadmissibility under INA § 212(a)(7)(A)(i)(I), on the theory that his parole had terminated and he no longer possessed a valid entry document. The NTA designated Petitioner as an "arriving alien."

25. On March 7, 2026, ICE took Petitioner into custody from the interior of the United States and transferred him to the Stewart Detention Center in Lumpkin, Georgia. On June 18, 2026, ICE transferred Petitioner from the Stewart Detention Center to the Irwin County Detention Center in Ocilla, Georgia, where he is currently detained. He has remained in continuous ICE custody throughout this period. ICE did not apprehend Petitioner at the border. ICE did not apprehend Petitioner at a port of entry. ICE did not apprehend Petitioner while he was seeking lawful entry. ICE apprehended Petitioner from his community in Orlando, Florida, where he had resided for over three years.

26. ICE has classified Petitioner as subject to mandatory detention without bond under 8 U.S.C. § 1225(b)(2)(A) and the Board of Immigration Appeals' decisions in Matter of Yajure Hurtado, 29 I&N Dec. 216 (BIA 2025), and Matter of Oseiwusu, 22 I&N Dec. 19 (BIA 1998). As a result, Petitioner has not been afforded any bond hearing, any custody review, or any individualized determination of whether his continued detention is justified by flight risk or danger to the community. Counsel for Petitioner has been informed by ICE and EOIR that no such hearing is available because Petitioner is classified under § 1225(b)(2)(A). See 8 C.F.R. § 1003.19(h)(2)(i)(B).

27. On May 19, 2026, the Department of Homeland Security filed a Motion to Pretermit Petitioner's protection applications based on the U.S.-Belize Asylum Cooperative Agreement. On June 3, 2026, the Department orally withdrew that motion. Petitioner's protection applications remain pending. The next master calendar hearing in Petitioner's removal proceedings is set for June 26, 2026, before Immigration Judge George Ward, via internet-based hearing. The individual merits hearing on Petitioner's protection applications has not yet been scheduled.

D. Petitioner Is Not a Flight Risk or a Danger.

28. Petitioner has substantial ties to the United States. He has resided continuously in Orlando, Florida, for more than three years. He is the father of a United States citizen child. He has worked steadily, paid taxes, and maintained the same residential address for the entirety of his time in the United States. He has substantial community ties through the Haitian community in Central Florida. He has retained counsel and is actively pursuing a substantial and well-documented application for asylum.

29. In the more than three years between Petitioner's lawful parole into the United States in February 2023 and his detention by ICE in March 2026, Petitioner complied with every condition of his parole. He never failed to appear at a hearing, an interview, or any other required appointment. He never changed his address without proper notice. His track record speaks for itself: he is not a flight risk and he is not a danger to the community.

LEGAL FRAMEWORK

A. Section 1225 Governs Arriving Aliens at the Border; Section 1226 Governs Aliens in the Interior.

30. The Immigration and Nationality Act establishes two distinct civil immigration detention regimes. Section 1225 of Title 8 governs the inspection, screening, and detention of arriving aliens at U.S. ports of entry and at the border. Section 1226 of Title 8 governs the detention of aliens already present in the interior of the United States, pending a decision on their removal.

31. The Supreme Court has long described this distinction. See Jennings v. Rodriguez, 583 U.S. 281, 287–88 (2018) (describing § 1225 as governing aliens "who arrive at our shores" and § 1226 as governing aliens "already in the country"). Section 1225 "mandate[s] detention of applicants for admission until certain proceedings have concluded," id. at 296, while § 1226(a) authorizes detention of aliens "pending a decision on whether the alien is to be removed," with bond and release "on conditional parole" available. 8 U.S.C. § 1226(a). For aliens detained under § 1226(a), federal regulations confer on immigration judges the authority to redetermine custody and set bond. 8 C.F.R. §§ 1003.19(a), 1236.1(d). For aliens detained under § 1225(b)(2)(A), regulations bar immigration judges from setting bond. 8 C.F.R. § 1003.19(h)(2)(i)(B).

B. Binding Eleventh Circuit Precedent Holds That § 1225(b)(2)(A) Does Not Apply to Aliens in the Interior.

32. On May 6, 2026, the Eleventh Circuit decided Hernandez Alvarez v. Warden, Federal Detention Center Miami, Nos. 25-14065/14075, 2026 WL 1243395 (11th Cir. May 6, 2026). The Court of Appeals affirmed the Southern District of Florida's grant of habeas relief to two petitioners arrested by ICE in the interior of the United States and detained without bond hearings under § 1225(b)(2)(A). The Eleventh Circuit held that the Government's reading of § 1225(b)(2)(A) — under which all unadmitted aliens are subject to mandatory detention

regardless of where they are arrested or how long they have lived in the United States — is foreclosed by the statute's text, structure, and history. Id. at *14.

33. The Eleventh Circuit's holding is unambiguous: "§ 1225 applies to arriving aliens seeking entry at the border, whereas § 1226 applies to aliens unlawfully in the interior." Id. The Court reasoned that § 1225(b)(2)(A) imposes mandatory detention only on persons who are both (1) an "applicant for admission" within the statutory definition AND (2) "seeking admission" — that is, "actively pursuing lawful entry through inspection." Id. at *11–13. A person who was lawfully paroled into the United States years earlier and is now residing in the interior is not "seeking admission" in any active or ongoing sense and is therefore not subject to § 1225(b)(2)(A)'s mandatory detention provisions. Id. at *14.

34. The Eleventh Circuit's decision is binding precedent on this Court. Although the mandate has not yet issued, the Eleventh Circuit's published opinion has immediate precedential effect. See Martin v. Singletary, 965 F.2d 944, 945 n.1 (11th Cir. 1992) (a published opinion "is the law in this circuit unless and until it is reversed, overruled, vacated, or otherwise modified by the Supreme Court of the United States or by [the Eleventh Circuit] sitting en banc").

C. Petitioner's Case Is on All Fours With — and in Fact Stronger Than — Hernandez Alvarez.

35. The petitioners in Hernandez Alvarez entered the United States without inspection, resided in the interior for several years, and were arrested by ICE following traffic stops in Florida. 2026 WL 1243395, at *2. They had no formal authorization to be in the United States. They had simply lived here. The Eleventh Circuit held that even those petitioners — who entered without inspection — were not "seeking admission" within the meaning of §

1225(b)(2)(A) when they were arrested in the interior, and were therefore detained, if at all, under § 1226(a). Id. at *14.

36. Petitioner's position is materially stronger than that of the Hernandez Alvarez petitioners. Petitioner did not enter without inspection. He was *lawfully paroled* into the United States by Customs and Border Protection at San Ysidro on February 25, 2023, pursuant to INA § 212(d)(5)(A). His residence in the United States since that date has been affirmatively authorized by the federal government. He filed a timely application for asylum. He complied with every condition of his parole for more than three years. Whatever marginal force the Government's reading of § 1225(b)(2)(A) might retain against an entrant without inspection — and after Hernandez Alvarez it retains none in this Circuit — that reading has no purchase whatsoever against a long-term lawful parolee.

D. Under 8 U.S.C. § 1226(a), Petitioner Is Entitled to a Bond Hearing.

37. An alien detained under 8 U.S.C. § 1226(a) is entitled to seek release on bond or conditional parole, and to a custody redetermination (bond hearing) before an immigration judge. See 8 C.F.R. §§ 1003.19(a), 1236.1(d); Jennings, 583 U.S. at 288 (describing § 1226 detainees as eligible for release on bond). The Eleventh Circuit in Hernandez Alvarez expressly held that the petitioners in that case were *"eligible for bond"* upon the district court's determination that § 1226(a) governed their detention. 2026 WL 1243395, at *3.

38. Because ICE has classified Petitioner under § 1225(b)(2)(A), Petitioner has not received — and under existing administrative procedures cannot receive — a bond hearing. See 8 C.F.R. § 1003.19(h)(2)(i)(B). The remedy is straightforward and has been applied by federal district courts within the Eleventh Circuit following Hernandez Alvarez: this Court should

declare that Petitioner is detained under 8 U.S.C. § 1226(a) and order Respondents either to provide him with a bond hearing before an immigration judge or to release him from custody. See Batista Perez v. Venturella, No. 3:26-cv-00543-JEP-SJH (M.D. Fla. May 22, 2026); see also Guerrero Orellana v. Moniz, Case No. 1:25-cv-12664-PBS (D. Mass.) (granting class-wide preliminary injunction on identical statutory misclassification theory).

E. Sister Circuits Have Reached the Same Conclusion.

39. The Second and Sixth Circuits have reached the same conclusion as the Eleventh. See Barbosa da Cunha v. Freden, No. 25-3141-pr, 2026 WL 1146044 (2d Cir. Apr. 28, 2026); Lopez-Campos v. Raycraft, Nos. 25-1965/1969/1978/1982, 2026 WL 1283891 (6th Cir. May 11, 2026). A consistent body of federal district court authority has likewise rejected the Government's expansive reading of § 1225(b)(2)(A) and held that interior-arrested aliens are governed by § 1226(a). See, e.g., Mosqueda v. Noem, 2025 WL 2591530 (C.D. Cal. Sept. 8, 2025); Vazquez v. Feeley, 2025 WL 2676082 (D. Nev. Sept. 17, 2025); Rodriguez v. Bostock, 2025 WL 2782499 (W.D. Wash. Sept. 30, 2025); Sampiao v. Hyde, 2025 WL 2607924 (D. Mass. Sept. 9, 2025).

40. The Fifth and Eighth Circuits have reached the opposite conclusion. See Buenrostro-Mendez v. Bondi, 166 F.4th 494 (5th Cir. 2026); Avila v. Bondi, 170 F.4th 1128 (8th Cir. 2026). Those decisions are not binding in this Circuit and are foreclosed by Hernandez Alvarez.

CLAIMS FOR RELIEF

COUNT ONE

Statutory Misclassification — Petitioner Is Detained Pursuant to 8 U.S.C. § 1226(a), Not 8 U.S.C. § 1225(b)(2)(A), and Is Entitled to an Individualized Bond Hearing

41. The allegations in the preceding paragraphs are realleged and incorporated herein.

42. Section 1225(b)(2)(A) of Title 8 does not apply to noncitizens arrested in the interior of the United States. Hernandez Alvarez v. Warden, Federal Detention Center Miami, Nos. 25-14065/14075, 2026 WL 1243395, at *14 (11th Cir. May 6, 2026). It applies only to noncitizens who are both (a) statutorily deemed "applicants for admission" and (b) actively "seeking admission" through inspection at the border or at a port of entry. Id. at *11–14.

43. Petitioner was lawfully paroled into the United States on February 25, 2023. He resided continuously in the interior of the United States for more than three years before his arrest by ICE on March 7, 2026. At the time of his arrest, Petitioner was not at a port of entry, was not at the border, was not present at any immigration inspection point, and was not actively seeking lawful entry or admission to the United States. He was at home in Orlando, Florida, where he had lived for over three years.

44. Petitioner is therefore not subject to 8 U.S.C. § 1225(b)(2)(A). Hernandez Alvarez, 2026 WL 1243395, at *14. He is subject, instead, to 8 U.S.C. § 1226(a), which governs the detention of "alien[s] . . . pending a decision on whether the alien is to be removed from the United States." 8 U.S.C. § 1226(a).

45. Under 8 U.S.C. § 1226(a) and its implementing regulations, Petitioner is entitled to seek release on bond and to an individualized custody redetermination hearing before an immigration judge. 8 C.F.R. §§ 1003.19(a), 1236.1(d); Jennings, 583 U.S. at 288.

46. Respondents' classification of Petitioner under 8 U.S.C. § 1225(b)(2)(A), and Respondents' refusal to afford Petitioner a bond hearing on the basis of that classification, is

contrary to binding Eleventh Circuit precedent in Hernandez Alvarez and constitutes unlawful detention in violation of 8 U.S.C. § 1226(a) and its implementing regulations.

47. Petitioner is entitled to a declaration that he is detained under 8 U.S.C. § 1226(a), and to an order directing Respondents either to provide him with an individualized bond hearing before an immigration judge or to release him from custody.

COUNT TWO

Violation of Fifth Amendment Right to Due Process (Preserved)

48. The allegations in the preceding paragraphs are realleged and incorporated herein.

49. In the alternative, and in the event that this Court does not grant relief on Count One, Petitioner respectfully preserves the argument that his continued civil immigration detention without an individualized bond hearing violates the Due Process Clause of the Fifth Amendment to the United States Constitution. Zadvydas v. Davis, 533 U.S. 678, 690 (2001) ("Freedom from imprisonment — from government custody, detention, or other forms of physical restraint — lies at the heart of the liberty that [the Due Process] Clause protects."); Demore v. Kim, 538 U.S. 510, 523 (2003) (aliens "generally are entitled to the right to due process of law as their detention proceeds").

50. The protection against arbitrary and prolonged civil detention applies to all persons subject to United States law, including parolees who have lived in the interior of the United States for years. Even if 8 U.S.C. § 1225(b)(2)(A) were construed to authorize Petitioner's detention without a bond hearing — and as set forth in Count One, it cannot be so construed consistent with Hernandez Alvarez — such a construction would raise serious constitutional concerns. See Jennings v. Rodriguez, 583 U.S. 281, 314 (2018) (remanding

constitutional question); Edward J. DeBartolo Corp. v. Florida Gulf Coast Bldg. & Constr. Trades Council, 485 U.S. 568, 575 (1988) (constitutional avoidance canon).

51. Petitioner preserves this constitutional claim for review and asserts it as an alternative basis for the relief requested herein.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court grant the following relief:

A. Assume jurisdiction over this matter;

B. Issue an Order to Show Cause ordering Respondents to show cause within three days why this Petition should not be granted, pursuant to 28 U.S.C. § 2243;

C. Declare that Petitioner is detained pursuant to 8 U.S.C. § 1226(a), not 8 U.S.C. § 1225(b)(2)(A);

D. Issue a Writ of Habeas Corpus ordering Respondents, within fourteen days of the entry of this Court's order, either (i) to afford Petitioner an individualized bond hearing before an immigration judge of the Executive Office for Immigration Review, consistent with 8 U.S.C. § 1226(a) and its implementing regulations; or (ii) to release Petitioner from custody;

E. Declare that Respondents' classification of Petitioner under 8 U.S.C. § 1225(b)(2)(A) is contrary to binding Eleventh Circuit precedent and unlawful under the Immigration and Nationality Act;

F. Award Petitioner attorney's fees and costs under the Equal Access to Justice Act, 28 U.S.C. § 2412, and on any other basis justified under law; and

G. Grant any further relief this Court deems just and proper.

Respectfully submitted,

/s/ Wide M. Thomas

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Dated: June 25, 2026

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

I represent Petitioner Loukens Jeune (A 241-012-172) 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 27th day of June, 2026.

/s/ Wide M. Thomas

WIDE M. THOMAS, ESQ.
Counsel for Petitioner