FILED
JUL 06 2026
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT

for the

Southern District of Illinois

ELSHAD SULEYMANOV
Petitioner
(the name under which you were convicted)

v.

CHRISTOFER J.LAROSE SENIOR WARDEN, OTAY MESA DETENTION CENTER
Respondent
(authorized person having custody of Petitioner)

Case Number: '26CV3878 JO SBC

PETITION FOR A WRIT OF HABEAS CORPUS UNDER 28 U.S.C. § 2241

Personal Information

1. (a) Your full name: ELSHAD SULEYMANOV

   (b) Other names you have used: _____

2. Place of confinement:

   (a) Name of institution: OTAY MESA DETENTION CENTER

   (b) Address: 7488 CALZADA DE LA FUENTE
   SAN DIEGO,CA,92154

   (c) Your identification number: [redacted]

3. Are you currently being held on orders by:

   ☑ Federal authorities ☐ State authorities ☐ Other - explain:

   _____

4. 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 _____

   _____

   (b) Docket number of criminal case: _____

   (c) Date of sentencing: _____

   ☑ Being held on an immigration charge

   ☐ Other *(explain)*: _____

   _____

   _____

Decision or Action You Are Challenging

5. What are you challenging in this petition:

   ☐ How your sentence is being carried out, calculated, or credited by prison or parole authorities (for example, revocation or calculation of good time credits)

☐ Pretrial detention
☑ Immigration detention
☐ Detainer
☐ The validity of your conviction or sentence as imposed (for example, sentence beyond the statutory maximum or improperly calculated under the sentencing guidelines)
☐ Disciplinary proceedings
☐ Other *(explain)*: _____

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

(a) Name and location of the agency or court: U.S. Immigration and customs enforcement(ICE) OTAY MESA DETENTION CENTER SAN DIEGO,CA

(b) Docket number, case number, or opinion number: _____

(c) Decision or action you are challenging *(for disciplinary proceedings, specify the penalties imposed)*: Petitioner is challenging his prolonged and excessive detention without an individualized bond hearing. Petitioner is requesting his immediate release from the custody or an alternative bond hearing.

(d) Date of the decision or action: _____

Your Earlier Challenges of the Decision or Action

7. **First appeal**

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

☐ Yes ☑ No

(a) If "Yes," provide:

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

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not _____

8. **Second appeal**

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

☐ Yes ☑ No

(a) If "Yes," provide:

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

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a second appeal: _____

9. **Third appeal**

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

☐ Yes ☑ No

(a) If "Yes," provide:

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

(2) Date of filing: _____

(3) Docket number, case number, or opinion number: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) If you answered "No," explain why you did not file a third appeal: _____

10. **Motion under 28 U.S.C. § 2255**

In this petition, are you challenging the validity of your conviction or sentence as imposed?

☐ Yes ☑ No

If "Yes," answer the following:

(a) Have you already filed a motion under 28 U.S.C. § 2255 that challenged this conviction or sentence?

☐ Yes ☑ No

If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(b) Have you ever filed a motion in a United States Court of Appeals under 28 U.S.C. § 2244(b)(3)(A), seeking permission to file a second or successive Section 2255 motion to challenge this conviction or sentence?

☐ Yes ☑ No

If "Yes," provide:

(1) Name of court: _____

(2) Case number: _____

(3) Date of filing: _____

(4) Result: _____

(5) Date of result: _____

(6) Issues raised: _____

(c) Explain why the remedy under 28 U.S.C. § 2255 is inadequate or ineffective to challenge your conviction or sentence: _____

11. **Appeals of immigration proceedings**

Does this case concern immigration proceedings?

☑ Yes ☐ No

If "Yes," provide:

(a) Date you were taken into immigration custody: 06/19/2025

(b) Date of the removal or reinstatement order:

(c) Did you file an appeal with the Board of Immigration Appeals?

☑ Yes ☐ No

If "Yes," provide:

(1) Date of filing: 06/18/2026

(2) Case number: [redacted]

(3) Result:

(4) Date of result:

(5) Issues raised:

(d) Did you appeal the decision to the United States Court of Appeals?

☐ Yes ☑ No

If "Yes," provide:

(1) Name of court:

(2) Date of filing:

(3) Case number:

(4) Result:

(5) Date of result:

(6) Issues raised:

12. **Other appeals**

Other than the appeals you listed above, have you filed any other petition, application, or motion about the issues raised in this petition?

☐ Yes ☑ No

If "Yes," provide:

(a) Kind of petition, motion, or application: _____

(b) Name of the authority, agency, or court: _____

(c) Date of filing: _____

(d) Docket number, case number, or opinion number: _____

(e) Result: _____

(f) Date of result: _____

(g) Issues raised: _____

Grounds for Your Challenge in This Petition

13. State every ground (reason) that supports your claim that you are being held in violation of the Constitution, laws, or treaties of the United States. Attach additional pages if you have more than four grounds. State the facts supporting each ground.

GROUND ONE: PROLONGED AND EXCESSIVE DETENTION IN VIOLATION OF DUE PROCESS

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

I have been subjected to prolonged and excessive immigration detention in violation of the due process clause of United States Constitution. Although immigration detention is civil and not intended to be punitive. My detention has far exceeded any reasonable purpose. As a result ,my detention has become excessive, arbitrary and unconstitutional.

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

☐ Yes ☑ No

GROUND TWO: I DO NOT POSE DANGER TO THE COMMUNITY AND CONTINUED DETENTION IS UNJUSTIFIED.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

Please see attached continuation of ground two.

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

☐ Yes ☑ No

GROUND THREE: MY CONTINUED DETENTION IS PUNITIVE,EXCESSIVE AND NO LONGER SERVES A LEGITIMATE CIVIL IMMIGRATION PURPOSE.

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

Please see attached continuation of ground three.

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

☐ Yes ☐ No

GROUND FOUR:

(a) Supporting facts *(Be brief. Do not cite cases or law.)*:

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

☐ Yes ☑ No

14. If there are any grounds that you did not present in all appeals that were available to you, explain why you did not: I did not previously present these grounds because i was detained,unrepresented and lacked meaningful access to legal resources. I was unable to adequately understand or raise these constitutional claims earlier.

Request for Relief

15. State exactly what you want the court to do: I respectfully request that the court order my immediate release or a bond hearing from immigration detention .As my Continued Detention is Excessive and no longer serves a legitimate civil immigration purpose. Petitioner is requesting the court to give him Federal Defenders lawyer since he have been detained for long time and petitioner does not have funds to pay to the lawyer. Petitioner is requesting for his immediate release from the custody or an alternative bond hearing.

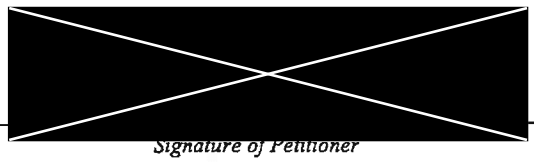
Declaration Under Penalty Of Perjury

If you are incarcerated, on what date did you place this petition in the prison mail system:

_____

I declare under penalty of perjury that I am the petitioner, I have read this petition or had it read to me, and the information in this petition is true and correct. I understand that a false statement of a material fact may serve as the basis for prosecution for perjury.

Date: 06-29-2026



Signature of Petitioner

_____

Signature of Attorney or other authorized person, if any

CERTIFICATE OF SERVICE

I, ELSHAD SULEYMANOV hereby certify that on 06-29-2026 I served a true and correct copy of the Petition for Writ of Habeas Corpus under 28 U.S.C § 2241, together with all attachments, on Respondent by depositing the same in United States Mail,postage prepaid,
addressed to:

Office of the Chief Counsel
U.S. Immigration and Customs Enforcement(ICE)
880 Front Street,Suite 2246
San Diego, CA 92101

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

Dated: 06-29-2026

[redacted]
Petitioner, Pro Se