

**UNITED STATES DISTRICT COURT
WESTERN OF WASHINGTON
TACOMA DIVISION**

TAREQ ZIAD FOUAD ZAKARNEH

Petitioner,

V.

**IMMIGRATION CUSTOM ENFORCEMENT
ET AL,**

Respondent,

Case No . 2:25-cv00707-DGE – GJL

**REPLY TO THE GOVERNMENT RESPOND
OF MOTION TO DISMISS**

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WESTERN DISTRICT OF WASHINGTON AT TACOMA	
BY	DEPUTY

I.RESPOND TO THE INTRODUCTION

In a violation of federal rule 5.2(b)(2) the government redacted a statement of petitioner I-213 report of the immigration custom enforcement on May,22,2025 the respondent redact statement **“Subject stated has fear or torture if removed from the united states to Palestinian territories ”** *see EX.A*, while the statement is not subject for redaction to bar Zakarneh from any relief .

1|REPLY TO THE GOVERNMENT RESPOND OF MOTION TO DISMISS

On May ,29,2025 the respondent respond to the petitioner to dismiss his habeas claim , the respondent state that the petitioner has final removal order from the ninth circuit on April,28,2025 and did not state that the petitioner still in litigation of another appeal from the Board immigration of appeal of denial of his motion to reopen with and asylum application based on country change conditions August ,12,2025 , a motion to stay motion to reopen still pending at the the ninth circuit after the BIA denied he motion to reopen based on redacted reports from the FBI and the HSI see Dkt.1 which the petitioner filed a discovery request for it in August,2025 see *EX.B BIA decision August,12,2025*, the respondent denied the petitioner NIW application without adjudication accusing him that he is not admissible to the United States without giving him the chance to argue it at the court, his attorney was not able to locate him after the respondent tried to deport him illegally on June,6,2025 with a violation of the 24 hour inadequate notice see *A.A.R.P v. Trump* 145 Ct., as the respondent alleged that he has final order from the ninth circuit as he is subject to 90 days review which its a lies from the respondent, as never ever that has been happened or has their officers communicate with him to inform him any results for review or deportation, the petitioner still in custody since May.22.2024 , the waiting time period of 90 day already is gone, the petitioner has 460 days in custody of the Department of Homeland Security without any relief that the respondent offered him while he had an order for no removal under citation No.89 FED R.G.S 12743 for the native Palestinian , as after the BIA denied his motion to reopen on August,12,2025 see *EX.B* , the petitioner filed his asylum application with the USCIS directly on August,13,2025 before the expiration of the Deferred Enforcement Departure order for Palestinian, The Petitioner Motion to reopen has been denied based on the redacted reports from the FBI and

the HSI with defamation between the DOJ and the DHS against Zakarneh, now it comes to the record that DHS alleging with the DOJ that Zakarneh green card has been revoked because of his marriage separation with his wife which it comes to the record its not true , the government with prejudice thinks without any approval that Zakarneh is a member of  organization without any evidence or charge versus him and they keep him in detention as grudge *see Padilla v. Rumsfeld* ,the respondent is holding the petitioner at their custody since May,22,2024 to punish him with a violation of his first amendment and the fifth amendment because of his legal act versus the respondent , the respondent holds the petitioner as a grudge because the petitioner law sues against the respondent case 3:25-cv-00448-SB and other cases before *see 3:22-cv-1812-SI* that has been filed before which it blocked the sued agencies from their bonuses by the congress, the supported documents of the respondent motion's build on invalidity judgment the respondent mislead the court system when they refuse to release the petitioner evidence that approve the respondent is lying in their litigation and did not comply and cooperate with the petitioner requests to release his green card video and audio interviews of September ,2016 and March,2019 and almost 233 whited out pages has been held with its a violation of 5 USC 552 act , as the respondent provide a declaration for officer Enrique Rodriquez under oath lying about the petitioner that he is a Jordanian citizen which he is not *see Tareq Zakarneh Declaration EX.C* , as the status report by officer Rodriquez that has been provided by the respondent alleging that petitioner was transferred to Elpaso service processing center was not true as the petitioner never ever was in Elpaso processing center, the petitioner has been moved around the god's creation for almost ten days from June,6,2025 to June,14,2025 to obstruct his legal work with the district court in Tacoma,WA divi-

sion and with his lawyer at the Board of immigration of Appeal as in the district court of Oregon to dismantle his efforts to achieve his freedom and his residency and citizenship right at the USA see *Tareq Zakarneh declaration EX,C* as the petitioner was never ever has been told or his immigration lawyer that he will be removed from the country before they start moving him around the country as the immigration custom enforcement did not communicate with the board Of Immigration of Appeals to get an answer to approve or deny his motion to stay and motion to reopen which they must do it, the petitioner filed a motion to advance with the board of immigration to appeal on April,2025, the respondent is trying to keep him in detention under 8 U.S.C 1231 without specifying what paragraph under the statute of the immigration law as using *Zadvada v. Davis* , 533 U.S 678,700-01(2001) case which it does not apply on him , Mr.Zakarneh does not have any criminal history or violence charges as he has been in detention since May,22,2024 which it passed the 90 days review of another 460 days and more , as the government refused to renew his green card on 2022 and 2023 while his motion to stay was granted and he is originally a green card holder and the statute of the immigration law 8 C.F.R 264.5 (g) apply on him .

II. Respond to Factual and Procedural Background

A. Detention Authorities and Removal Procedures

The respondent alleged that he petitioner has a final order on April,28,202025, that's mean the respondent was detaining the petitioner illegally since

May,22,2024 , as the respondent did not declare to the court what was the main reason to detain him until his motion to release hearing on Feb,4,2025 when the respondent present a redacted reports from the FBI and HSI (Dkt.1 complaint) alleging that the petitioner is a part of terrorist organization without a valid evidence as unfortunately the immigration judge with prejudice accept the redacted reports from HSI and FBI as a valid evidence and refuse to release him, the petitioner filed a claim at the district court of Oregon and the state of Washington, the petitioner who has no criminal record and he is still in litigation for his ten years Green card and his citizenship, the respondent alleged that under 12319(a)(1) they have the right to keep the petitioner with removal period does not apply on Mr. Zakarneh because Mr.Zakarneh was and still protected under the deferred enforcement departure 89FED R.E.G 123743 which its prejudice to detain him or keep him in detention while he is still in litigation and its an obstruction of justice and his liberty under the fifth amendment to distract his legal work with his lawyer to gather the evidence and the information to approve his litigation and his rights of the US citizenship and residency as a free person. The respondent argued under title 8 U.S.SC 1231(a)(6) that Mr.zakarneh is inadmissible and Mr.Zakarneh has a criminal history which it does not apply on Mr.Zakarneh the attorney general has their own discretion to decide who is admissible or inadmissible which it does not mandate on Mr.Zakarneh while the attorney general in a conflict of interest represent the respondent in another case versus Mr.Zakarneh see case 3:25-cv-00448-SB Oregon district court *see EX.D* what brings his detention under a retaliation action *see docket records EX.D*, which the respondent did not comply with Mr.Zakarneh request since 2019 under the federal law of freedom of Information act 5 USCS 552 & 28 USC 1331 , as Mr.Zakarneh did not violate any non immigrant

visa status since his first entry on September,2011 on student visa and he left on January,2012 for emergency circumstances of his family or in his second entry on student visa on March ,20,2013 as he went to visit his family on October,2015 and had been admitted on his return on November ,2015 as a US resident, the respondent with prejudice try to show to the court that Mr.Zakarneh is a criminal person without any evidence under many statues of law under section 1227(a)(2) which it does not apply to Mr.Zakarneh to keep him in detention as a grudge and punishment for his freedom of speech and freedom of act of the government violation and his claims at the district court of the state of Oregon and the state of Washington or his comments on google about the USCIS office of Portland, Oregon which it is protected by the first amendment see *Mahadawi v. Trump* 136.F.4th fifth amendment clause , as the respondent alleging that they want to remove the petitioner under section 1227(a)(4)(B) and under 1182(a)(3)(B) which it does not apply on Mr.Zakarneh at all , Mr. Zakarneh does not have any criminal offense or security and related grounds or terrorist activity charges as the respondent is trying to reform a litigation without bases on the ground which its full of lies and it does not match any evidence or has any ground of facts and convictions, or under the 1182(a)(2) that Mr.Zakarneh has a criminal or related ground which its not related and was not built on any factual evidence or related grounds which it comes under grudges and a racial hate against Mr.Zakarneh, the case versus him was built on grudge and no factual evidence versus him the respondent is lying in their respond that has been provided by the attorney general at the immigration court of Tacoma ,Wa on Feb,4,2025 see *DK.1 attached evidence of his habeas case as at the BIA on Feb,7,2025 EX.E (respondent respond to Mr.Zakarneh motion on Jan,28,2025)*. The respondent is trying to start new period of removal under

8.U.S.C 1231(a)(1)(B)(ii) while they have been detaining Mr.Zakarneh since May,22,2025 which it pass any removal period that the respondent alleging versus the petitioner which it prejudice based on his original citizenship and nationality as a native Palestinian citizen as the respondent refuse to release him when he renewed his motion to stay on December,5,2024 which it was the cause to arrest as he has been told by officer Jose Arroyo on July,16.2025 , it was the main reason why he has been arrested , in contrary the immigration law is clear and obvious while the alien who is holding a temporary green card consider a green card holder with his rights till he stop proceeding at the immigration court and any court has jurisdiction on his immigration status see 8 C.F.R 264.5 (g) , this mean the respondent detained Mr.Zakarneh for almost a year and four months illegally with prejudice while he should be protected under Biden administration Deferred Enforcement Departure 89 FED REG 12743 order which it has been continued at Trump administration's , as the respondent did not provide any evidence under section 1227(a)(1)(C) that Mr.Zakarneh violate his non immigrant visa status since 2011 of his first entry to the state, as the attorney general alleging that Mr.Zakarneh Marriage was not in good faith or he is inadmissible does not apply because the attorney general office at their respond on February.4.2025 admit that Mr.Zakarneh marriage was legit not as the government alleged to get a deportation order against them with the department of justice by not objecting on his attorney statement that his marriage is legit *see the declaration or Mr.Eric Welsh see EX.C on February,4,2025* , at the motion to release hearing the petitioner tried with his attorney to get the recorded hearing for his motion on bond to release to translate it on transcripts the clerk office announce him is not founded for bond hearing *see Mr.Eric Welsh hearing EX.C , after this admission of DHS attorney and refuse to*

respond back to the petitioner attorney , DHS attorneys mislead the immigration courts and the BIA and Finally they mislead the appellate court of the ninth circuit to get judgmental based on invalid evidence which it violations of Due process and the constitutional rights of Zakarneh as it goes under the civil law of false claims Act.

B. Petitioner Tareq Zakarneh

The respondent erred when they mention that Mr.Zakarneh first entry and stay was 2011 , the petitioner left the state on Jan,2012 for emergency circumstances as he report that to his school , then the petitioner renew his visa on 2012-2013 and came back to United States on March,20,2013 the petitioner was married to US citizen on 09,2013 and he got his green card on June ,18,2014,if his married was fraudulent how he got his green cad on time without and obstruction while he intends the interview with his wife and did a separate interview at that date at the USCIS office in Portland Oregon , the petitioner married at 2013 and has been divorced on March,2017 how is his marriage less than two years , the USCIS has been informed in person by the petitioner between November,15,2016 and November,16,2016 that the petitioner annulment settlement conference with his wife failed and he is going to a final divorce trial and the the case worker Pamela Mark for meeting to inform her to stop any proceeding until h finalize his divorce by security officer David Wadell at the front desk , the officer Pamela Mark refused to meet the petitioner (Security CAMERA of the USCIS office can show that), denial of his I 751 was with prejudice based on and HSI and FBI redacted reports Dkt.1 of filing that the petitioner belongs for terrorist organization , as if the petitioner

marriage was not in good faith it raise a question of the immigration law how the petitioner got his first green card on June,18,2014 if his marriage was not in good faith , , as the petitioner has a verbal agreement tat has been recorded onhis green card interview on September,2016 that the government intend to give him his green card based on him with collaboration with the federal officers in case they asked him for help , the case of 3:25-cv-00448-SB *see EX.D* which its related to an older case 3:22-cv-1812-SI is to approve these conversation between him and his case worker Pamela Mark as he asked he about this conversation between him and his case worker Pamela Mark as he asked her about this conversation on his third green card interview on March,2018 , the government still alleging that the petitioner had a sham marriage which it is not true, the government refuse to release a discovery which it show they are lying in their litigation and the respondent mislead the immigration courts as the Ninth circuit with a violation of due process , the immigration judge rely on Mr.zakarneh wife's statement's and her friends without giving the chance to Mr.zakarneh to examine them, the petitioner challenge the respondent to produce one witness from the immigration office or his X-wife and her friends while the respondent did not produce one witness to testify versus Zakarneh (records of the immigration courts on December, 2109 and July,2019 , Portland, Oregon) *see Ching,725 F.3d at 1158*

Its prejudice to relay on divorce order to decide on a federal litigation without exhausting all of the due process remedies , its a violation of Zakarneh constitutional rights while the divorce Judge violate Mr.Zakarneh rights when he denied his CR60 motion while he approved to the court with the new evidence when his wife alleged in two different statement with her attorney under perjury that the separation hap-

pened in July,2016 then she changed her statement at the divorce trial of November,2014, until the ninth circuit on their order of Zakarneh v. Bondi No.22-1604 admit that they lack jurisdiction to review agency's factual determination related to the marriage evidence , which it makes Zakarneh to file a motion to reopen with his attorney between October,2024 and January,28,2025 with an asylum application under the DED order of 89 FED REG 12743 for Palestinian before they go to an oral argument at the ninth circuit of February .13.2025 , while Zakarneh advised his attorney Eric Welsh to file a motion to remand with the new evidence that they got from the respondent on his motion hearing to release on bond on Feb.4.2025, after the release has been rejected by the judge John Odell with prjudice at the immigration court based on redacted reports from the HSI and the FBI see EX.E with a violation of the due process to examine the officers and their anonymous witness in Jerusalem as the government did not produce any witness to testify against Mr.Zakarneh to examine them which it was a violation of due process at the immigration court proceeding on December,2018 and June,2019 in front of the IJ Zafarrdinho or at the release hearing on bond by Judge Odell, the government alleged that Zakarneh has been contacted by the immigration custom enforcement on September,2023 to ask for assistant to obtain of travel document it was weird action from the government if they did while Zakarneh does not have a final order until August,12,2025 and he already appeal it to the ninth circuit on September,9,2025 case No. 25-5806 and the district court according to their motion to dismiss on May,29,2025 , the respondent has inconsistency in their litigation they alleged the final order on August,29 ,2022 then they alleged the final order on April,2025 then they alleged to Senate Strickland office the final order on August,12,025 , the government has Mr.Zakarneh Po Box and Mailing address they can mail him their request with a cer-

tified mail but they did not do, the government should not call Zakarneh while they have their attorney in contact with him through the district court of Portland, Oregon Mr. Josh Killer for the FOIA case 3:22-cv-1812-Si and their attorney from OIL Mr. Drew Brinkman at the ninth circuit, Zakarneh was in the immigration of custom enforcement office on October, 2022 and November 2022 at their address in down town Portland, Oregon, asking their attorney at the front desk to release the evidence that he is entitled to from the USCIS and ICE as the final resort to extract the legal documents under the freedom of Information act, ICE police asked Mr. Zakarneh not to come back to their office or he will be arrested (Security Camera can approve it) then Zakarneh on November, 18, 2022 file claim versus the DHS agencies at the district court of Oregon which it continue proceeding under 3:25-cv-00448-SB *see EX.D*, when a legal permanent resident are in litigation of immigration proceeding he still entitled to renew his residency under 8 C.F.R 264.5(g), Zakarneh tried twice to renew his green card with the USCIS at their office in Portland Oregon and the director Mrs Margret Rosenset refused to do it on February, 2023 and August, 2023 in grudge while Zakarneh show the director the law that it was provided by his consultation attorney Mr. John Marandas form Marandas Law group, as in grudge for his FOIA complaint at the district court 3:22-cv-1812- SI which it is now 3:25-cv-00448-SB, Zakarneh is not obligated to comply with ICE for any request because ICE and the other government agencies is trying to stop Zakarneh in his litigation in retaliation of his complaints versus the government at the district court of the state of Oregon and the state of Washington, the respondent is trying to say that the 90 days review starts on April, 28, 2025 under 8 USC 1231(a)(2) which it is not true the supreme court was clear in *Zadyvdas v. Davis*, 533 U.S he has criminal background without stating what their criminal charges while this does not apply on Zakarneh, Zakarneh has been

in detention since May,22,2024 which it is unlawful detention under the first amendment and the Fifth Amendment, the government is trying to keep Zakarneh in detention the longest time that they can in retaliation from him and to dismantle his civil cases versus them and to make him sign for deportation and give up all of his rights and leave the country after they denied his motion to reopen base on an asylum application at the BIA and they accused him of terrorism and support of a palestinian militant  based on a redacted reports of the HSI and the FBI see Dkt.1 as the res[ondent acting generously by granting him a volunteer departure for unknown destination or they will start charging him 998 dollar per day under 274D of the immigration and Nationality act , 8 U.S.C , 1324 D ; 8 C.F.R 280.53(b)(14) , the government is trying to keep Zakarneh in detention the longest time that they can in retaliation from him and to cause for him the largest damage of his life and his family and they were successful with that his company collapsed his bank account has been locked and credit cards ,as they moved him around the god's creation between June 6,2025 to July,1 2025 to two location on 14 flights back and forth cuffed and restraint under and extreme and hard circumstances when they tried to deport him illegally while he was still in litigation at the BIA and the district court , as he has been asked to sign an agreement to be deported to Mexico with a violation of the DED REG89 for Palestinian and he is well known holds a stateless nationality as a residence and native from Palestine qualify for CAT and asylum , as ICE and DHS got a travel document from Zakarneh under an extreme duress when he was on a hunger strike by his friend Hicham Ayach , as ICE state for Zakarneh and Ayach after handing the passport to officer Santiago and Arroyo that Zakarneh will leave on August ,22,2024 , ICE kept Zakrneh in custody and they lied to him *see Tareq Zakarneh declaration EX.C*, DHS is trying to deport him anonymously as they tried on June,8,2025 and

June,12,2025 through Arizona Florence detention center and Alvarado Texas through Dallas airport , and they fail sympathetically , as they lied to the court when they file a status report indicating that Zakarneh located in El Paso Texas *see Tareq Zakarneh declaration, EX.C*, Zakarneh never ever was in El Paso processing center at the state of Texas , officer Rodriquez lied under oath with his lawyer in his status report to the court on June,17,2025, as the government has a lot of violations of the medical constitutional rights under 6.3 Franklin Ramirez v. Ice at el 3:25-cv-05426- Lk -SKV, Zakarneh testify in favor of Farnklin Ramirez when his medical rights has been violated in front of him at the NWIPC in Tacoma, WA from the respondent.

III. Respond to the respondent argument and authority

The respondent argue under 8 U.S.C 1231(a)(2) that Zakarneh detention must be a post order detention to be mandated, the respondent argue under a generic law of 1231(a)(2) without noting what they have versus Zakarneh and the relation of Zakarneh and the litigation that he has versus the respondent to dismantle his federal case 3:25-cv-00448-SB versus the respondent which judge Beckerman mentioned that his FOIA case is related to his habeas case 3:25-cv-00394-Sb before considering his complaint as a habeas case and transfer it to the district court of western of Washington at this claim 2:25-cv-00707-DGE-GJL , the respondent argue that the beginning period of time is based on 1231(a)(1)(B)(ii) as a constitutional question to the respondent what was the petitioner doing in their custody since May,22,2024 ,which the government must answer it in evidentiary hearing, as to

keep US citizen or an alien and subject him to mandate detention the government should show to the interest of public why he should not be released, if he is a danger person to the community or danger to the national security with evidence and facts in a factual hearing in federal litigation Or he is not in proceeding and waived his rights to be deported as he exhausted all of the administrative remedies and waiting to be deported and he agreed to be deported based on that he is not asking for any relief under other statues, but Zakarneh is still in litigation and still proceeding at the Ninth circuit and the district court as he has the right to file a new motion to reopen his case with the BIA to examine the HSI and the FBI agents who brought these redacted reports with their alleged witness and persecuted them which it was prejudice by the BIA and the IJ to consider these redacted doctorate reports as a valid evidence , as denying the petitioner motion to reopen and motion to release was prejudice by the immigration court and the Board of Immigration of appeals .

2. Respond to the respondent argument of Post -Order detention authorized by statue and limited to a deadline period does not raise a constitutional claim

The respondent respond that Zakarneh was not able to state a claim for habeas relief was not true , the court state on June .11.2025 state that Zakarneh was able to articulate his constitutional claim for a habeas relief , based on the supplemental information that he submitted versus the respondent and the department of Justice when the immigration Judge Mr.John Odell with the respondent accept a redacted doctorate reports from the DHS and the FBI by the state department that he is a danger person and he belongs to terrorist organization without producing the name

of the witness at the immigration court and allow due process to examine them, it was prejudice to accept the doctorate reports as a valid evidence with a violation of the constitutional right for Zakarneh , *See EX.E* as in a violation of the fifth amendment *see Mahdawi V. Trump* , case 136.F4th 443 which its a violation of the fifth amendment to keep Zakarnmeh in detention as the respondent held the petitioner in custody for almost more than 460 days since May,22,2024 which its a violation of the constitutional rights of liberty, the respondent for the government agencies interest kept Zakarneh in excessive detention period to make him suffer to retaliate from him while Zakarneh is Palestinian citizen and not deportable too.

3. Reply to the Respondent an Alien interest in liberty does not raise a serious constitutional question until his detention has become indefinite or permanent .

Zakarneh originally should not be detained because this claim comes versus him while he is still in litigation and he should be protected under the statue of his litigation and the deferred Enforcement Departure order 89FED R.E.G 12743 order for the Palestinian ,as the government admit on Feb,4,2025 that Mr.Zakarneh marriage was real *see Declaration of Eric Welsh EX.C* at the court hearing on Feb,4,2025 .

The affirm of six months detention by the supreme court comes under statues of release for an alien who is danger to the community or he is asking to be removed while this does not apply on Zakarneh , Zakarneh still seeking a relief under the change of country conditions through the BIA and through the USCIS based on the NIW program which he qualified for as the respondent is putting a heavy weight effort to deny any relief for Zakarneh, based on identifying Zakarneh as an inadmissible for any relief as the USCIS with DHS intend to deny his EB2 application and they did on July.25.2025 and Zakarneh is proceeding to refile it again after his private lawyer suggest it with no cost

on him, after they put Zakarneh on their flight around the god's creation to prevent his lawyer to communicate with him and prepare the proper reply for their intention to deny and lied to his immigration lawyer where he is located in intention of obstruction of justice, as to the interest of the department of Justice and the DHS to deport Zakarneh for unknown destination with grudge and retaliation for his act under the first amendment .

The respondent is trying to match Jama v. ICE it does not apply because Zakarneh still in immigration proceeding .

Zakarneh should be released as soon as possible for the interest of justice , as ICE tried to deport Zakarneh him illegally with grudge and falsely doctorate acquisition with an obstruction of Justice to dismantle his litigation at the federal district court and at the BIA *see the status report of officer Enrique Rodriguez on June,17,2025 EX.F* twice without approving that they contact the Board Immigration of Appeal to get judgment on his motion to stay which its an imminent as they were in proceeding to violate the Deferred Enforcement Departure for Palestinian and violate the supreme court adequate notice ,Zakarneh due process was not exhausted and still proceeding at the moment of the DHS intention to deport Zakarneh see the BIA decision EX.B based on the redacted reports from the HSI and the FBI .

The respondent violate Zakarneh constitutional rights and due process when they tried to deport him without of 24 hours notice *see AARP v. Trump , 145 S.Ct,1364* , while his motion to stay was pending and his motion to reopen based on country change conditions.

Conclusion

For the forgoing reasons the petitioner asking the court to grant his release him immediately with a Preliminary injunction under Rule 65 from the pain and suffer at the detention facility , Zakarneh is entitled for with preliminary injunction with Rule .65 *see Leqaa Kordia v. Kristi Noem ,2025 U.S dist lexis 136346 .*

This is dated Of September ,17,2025

/s/ Tareq Zakarneh

Tareq Zakarneh, Petitioner

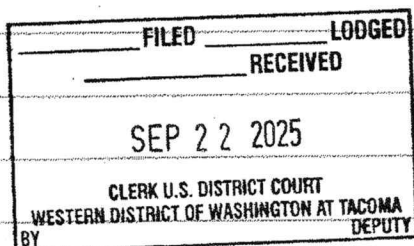
Certificate of Service
Case No 2:25-cv-00707-DGE-GJL

I Tareq Zakarneh certify that I served the respondent
on September, 18, 2025 a copy of the Reply
to the government respond of Motion to Dismiss
at the Address below by the First Class

Mail:

US States Attorney
1201 Pacific Ave, Ste 700
Tacoma, WA 98402

This is dated on September, 18, 2025



/s/ Tareq Zakarneh
Tareq Zakarneh, Petitioner

Exhibit F is missing
because of library over-
crowding 8.4 and schedule
As the lieutenant in charge
of swing shift refused
to do it Mr. Stock, it
will be add it in
supplemental declaration
of exhibit's testimony
from A to F of the
petitioner. Tareq2025