

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
Abilene Division**

Reza Yaghoubi Yeganeh,

Petitioner,

v.

Warden, *Bluebonnet Detention Facility;*

Field Office Director, *ICE Dallas*
Field Office;

Kristi Noem, *Secretary of Homeland*
Security,

Todd Lyons, *Acting Director, U.S.*
Immigration and Customs Enforcement,

Pamela Bondi, *Attorney General,*

Respondents.

Civ. Action No. _____

PETITION FOR WRIT OF HABEAS CORPUS

1. Petitioner Reza Yaghoubi Yeganeh ("Mr. Yaghoubi Yeganeh") is a noncitizen who was ordered removed to his native Iran on December 9, 2014. A federal statute, 8 U.S.C. § 1231(a)(6), gives the government 180 days to effectuate such removal; yet over ten years later, the government has failed to do so, and cannot provide a date certain or even an estimate of when such removal can reasonably be expected. On March 18, 2025, the government inexplicably and without forewarning arrested and re-detained Mr. Yaghoubi Yeganeh, notwithstanding the lack of any articulable facts that removal would now suddenly become possible. Meanwhile, the government of Iran and that country's airports are completely closed off to the United States, which recently bombed that country. Under such circumstances, continued detention violates the statute as interpreted by the Supreme Court in *Zadvydas v.*

Davis, 533 U.S. 678 (2001), and Mr. Yaghoubi Yeganeh must be released from custody on an Order of Supervision until there exists a significant likelihood of removal in the reasonably foreseeable future.

JURISDICTION AND VENUE

2. This action arises under the Immigration and Nationality Act of 1952 (“INA”), as amended, 8 U.S.C. § 1101 *et seq.*, and the Due Process Clause of the Fifth Amendment to the United States Constitution. This Court has jurisdiction pursuant to Art. I, § 9, cl. 2 of the United States Constitution; 28 U.S.C. § 2241 (general grant of habeas authority to the district courts); 28 U.S.C. § 1331 (federal question jurisdiction); 28 U.S.C. §§2201, 2202 (Declaratory Judgment Act); and 28 U.S.C. § 1651 (All Writs Act).

3. Venue is proper under 28 U.S.C. § 1391(e) because Petitioner is detained at the Bluebonnet Detention Facility in Jones County, within the Northern District of Texas. *See Braden v. 30th Judicial Circuit Court of Kentucky*, 410 U.S. 484, 494–95 (1973).

PARTIES

4. Reza Yaghoubi Yeganeh, the Petitioner, is a citizen and native of Iran and has lived in United States since 1994. He has a final order of removal to Iran, and is currently detained by Respondents at the Bluebonnet Detention Center in Anson, Texas.

5. The Warden of the Bluebonnet Detention Center is the immediate physical custodian of Petitioner for purposes of a federal habeas petition. *Braden*, 410 U.S. at 494–95.

6. The Field Office Director of the Immigration and Customs Enforcement (“ICE”) Dallas Field Office is responsible for overseeing ICE operations pertaining to noncitizens within its territorial jurisdiction, such as Mr. Yaghoubi Yeganeh, including detentions, enforcement, and removal operations. He is the immediate legal custodian of Petitioner for purposes of a federal habeas petition. *Braden*, 410 U.S. at 494–95.

7. Respondent Kristi Noem is the Secretary of the Department of Homeland Security (“DHS”). She is the cabinet-level secretary responsible for all immigration enforcement in the United States.

8. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement (“ICE”). He is the head of the federal agency responsible for all immigration enforcement in the United States.

9. Respondent Pamela Bondi is the Attorney General of the United States. The Immigration Judges who decide removal cases and applications for relief from removal do so as her designees.

FACTUAL ALLEGATIONS

10. Mr. Yaghoubi Yeganeh was born in 1974. He is a native and citizen of Iran.

11. Mr. Yaghoubi Yeganeh entered the United States as a refugee in 1994. He later adjusted status as a lawful permanent resident in 2009.

12. Mr. Yaghoubi Yeganeh’s entire immediate family are U.S. citizens and reside in the United States, including nieces and nephews born in the country. His parents and one of his brothers passed away as U.S. citizens.

13. In 2008, Mr. Yaghoubi Yeganeh was convicted of a financial crime, and thereafter was detained by ICE and received a Notice to Appear in immigration court.

14. Mr. Yaghoubi Yeganeh was ordered removed to Iran by an Immigration Judge (“IJ”) in Aurora, Co. on December 9, 2014.¹ Mr. Yaghoubi Yeganeh did not appeal to the Board of Immigration Appeals (“BIA”).

15. Pursuant to 8 U.S.C. § 1231(a)(1), the government then sought to remove Mr. Yaghoubi Yeganeh to Iran, or to any other country on earth that would accept him from removal.

¹ Ex. A, EOIR Automated Case Information System.

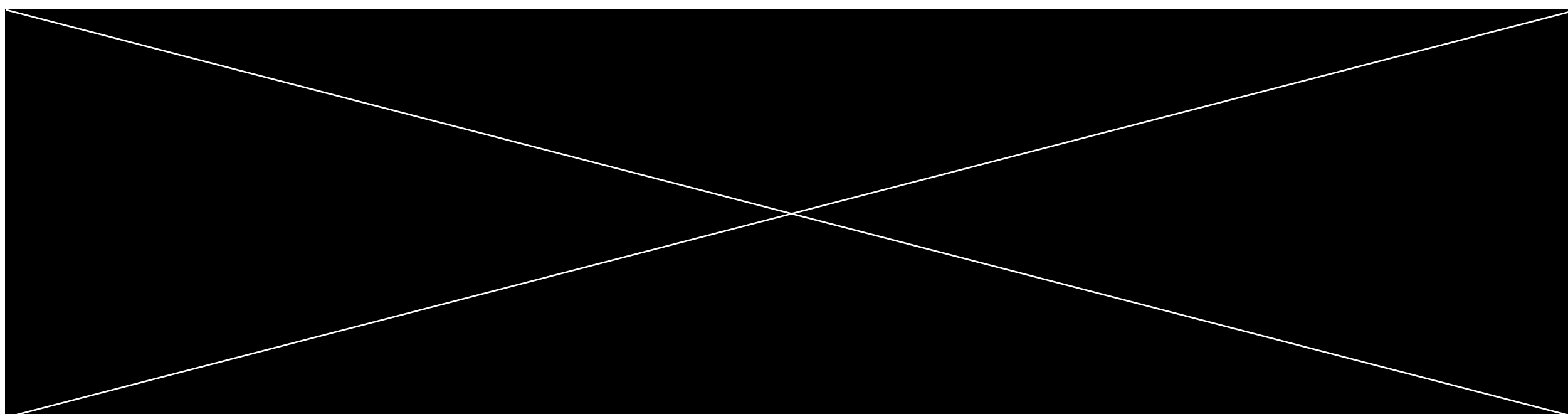
Finding no country on earth to which it could remove Mr. Yaghoubi Yeganeh, the government released him from custody on an Order of Supervision on March 10, 2015.²

16. Mr. Yaghoubi Yeganeh's Order of Supervision placed strict conditions on his supervised release and required periodical check-ins with ICE. For the next decade, he faithfully abided by the conditions of his supervised release.³

17. On March 18, 2025, when Mr. Yaghoubi Yeganeh sought permission from his ICE Officer to visit his older brother diagnosed with cancer, in compliance with the terms of his Order of Supervision, Respondents arrested and re-detained him without any forewarning. At that time, Respondents lacked (and, to this day, still lack) any articulable basis to believe that Iran, or any other country on earth, will accept Mr. Yaghoubi Yeganeh for removal.

18. Currently, Mr. Yaghoubi Yeganeh is located at Bluebonnet Detention Facility, where he remains detained today.⁴

19. For over a decade, Mr. Yaghoubi Yeganeh has received ongoing medical treatment and therapy for a wide range of physical and mental health conditions, including:



² Ex. B, Form I-220B Order of Supervision and personal report record.

³ Mr. Yaghoubi Yeganeh has consistently complied with the conditions of his supervised release. Over the years, he was issued multiple Forms I-220B, as prior versions were occasionally collected and replaced by ICE officers. On several occasions, he was instead provided with a Form G-56, which outlined the date and time of his next required check-in. At one point, Mr. Huynh misplaced his Form I-220B and was subsequently issued a replacement. The most recent Form I-220B in his possession was confiscated upon his most recent apprehension by ICE.

⁴ Ex. C, ICE Online Detainee Locator System.

 He has been treated at various medical institutions, including the Oklahoma Heart Hospital,⁵ HOPE Community Services, Inc.⁶ and SSM Health Medical Group.⁷ Although Mr. Yaghoubi Yeganeh has received medication and has accessed psychiatric and mental health services while detained, the care provided is inadequate for someone with his complex medical history and traumatic background. As a former political prisoner in Iran who endured extreme cruelty and torture, his current treatment conditions are insufficient and may seriously hinder his long-term recovery.

20. Additionally, since December, Mr. Yaghoubi Yeganeh Reza has been awaiting surgery on his left knee; however, he has been unable to undergo the procedure due to his current detention. He also underwent a Magnetic Resonance Imaging (MRI) scan for his back, but the medical staff at the detention facility were unable to interpret the results due to a lack of proper reading or evaluation. Moreover, during his detention, Mr. Yaghoubi Yeganeh has reported needing a wheelchair and assistance to get around in the last two months, and he has developed new medical issues, including allergies, folliculitis, persistent constipation, chest pain, unhealed injuries and wounds, elevated blood sugar levels, and an anxiety attack triggered by distressing family news, specifically, the execution of one of his relatives in Iran.⁸ Prior to his detention, Mr. Yaghoubi Yeganeh received consistent treatment from qualified professionals and specialized programs that deeply understood and addressed his complex medical and psychological conditions. Since being detained, he has been forced to discontinue this care. As a result, his overall health has significantly deteriorated, placing him at serious risk of long-term harm to his physical and mental well-being. Respondents are fully aware of his medical conditions and the

⁵ Ex. D, Mr. Yaghoubi Yeganeh's medical records, Oklahoma Heart Hospital.

⁶ Ex. E, Letters from Mr. Yaghoubi Yeganeh Doctors, HOPE Community Services.

⁷ Ex. F, Mr. Yaghoubi Yeganeh's medical records, SSM Health Medical Group.

⁸ Ex. G, Mr. Yaghoubi Yeganeh medical records, Bluebonnet Detention Facility.

impact of his continued detention.

21. On June 19, 2025, ICE issued a Decision to Continue Detention.⁹ ICE declined to release Mr. Yaghoubi Yeganeh from detention, citing two reasons:^[REDACTED]

22. Since the issuance of his removal order in 2014, Mr. Yaghoubi Yeganeh has not committed any criminal offenses, nor has he been charged with any. Regarding his past convictions for financial crimes, he fully complied with all the terms and conditions of the supervised probation imposed by the criminal court. As outlined below, Mr. Yaghoubi Yeganeh has since strictly followed his Order of Supervision and participated in various programs aimed at addressing his mental health challenges and reintegrating as a productive and law-abiding member of society. His commitment to these programs has led to significant improvement, and he has not engaged in any further misconduct. He has also finished every program he started towards recovery and mental health. Furthermore, Mr. Yaghoubi Yeganeh's Employment Authorization Document was renewed just a month prior to his arrest. Therefore, the statement that he is "deemed a threat to public safety" is unfounded and lacks a factual basis.

23. ICE's "ongoing efforts to effect [Petitioner's] removal" consist solely of a "pending Travel Document request with the Iranian Embassy." Respondents have no articulable basis to believe that the Iranian Embassy will respond favorably to such request and issue a travel document to Mr. Yaghoubi Yeganeh, however.

24. Mr. Yaghoubi Yeganeh remains in immigration custody, and ICE has so far not been able to secure a travel document or remove Mr. Yaghoubi Yeganeh to Iran. Furthermore, ICE has not provided a date by which it believes it can deport Mr. Yaghoubi Yeganeh, or any other indication that it believes removal is significantly likely to occur within the reasonably foreseeable future.

⁹ Ex. H, ICE Decision to Continue Detention.

25. ICE has not made any efforts to remove Mr. Yaghoubi Yeganeh to any country other than Iran, because there are no articulable facts that would cause ICE to believe that he is removable to any country other than Iran. He possesses no claim to citizenship or residence in any other country, and there is no third country on earth generally willing to accept Iranian nationals with felony convictions.

LEGAL BACKGROUND

26. 8 U.S.C. §1231(a) permits DHS-ICE to detain noncitizens during the “removal period,” which is defined as the 90-day period during which “the Attorney General shall remove the alien from the United States.” 8 U.S.C. §1231(a)(1)(A). In this case, pursuant to 8 U.S.C. § 1231(a)(2)(B)(i), the removal period began when Mr. Yaghoubi Yeganeh’s removal order became administratively final, December 9, 2014. The “removal period” therefore expired on March 9, 2015.

27. After the expiration of the removal period, 8 U.S.C. § 1231(a)(3) provides that ICE shall release unremovable noncitizens on an order of supervision (the immigration equivalent of supervised release, with strict reporting and other requirements). Pursuant to 8 U.S.C. § 1231(a)(6), even noncitizens with aggravated felony convictions may be “released” if “subject to the terms of supervision” set forth in 8 U.S.C. § 1231(a)(3).

28. Constitutional limits on detention beyond the removal period are well established. Government detention violates due process unless it is reasonably related to a legitimate government purpose. *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001). “[W]here detention’s goal is no longer practically attainable, detention no longer ‘bear[s][a] reasonable relation to the purpose for which the individual [was] committed.’” *Id.* at 690 (quoting *Jackson v. Indiana*, 406 U.S. 715, 738 (1972)). Additionally, cursory or pro forma findings of dangerousness do not suffice to justify prolonged or indefinite detention. *Zadvydas*, 533 U.S. at 691 (“But we have upheld

preventative detention based on dangerousness only when limited to especially dangerous individuals [like suspected terrorists] and subject to strong procedural protections.”)

29. The purpose of detention during and beyond the removal period is to “secure[] the alien’s removal.” *Zadvydas*, 533 U.S. at 682. In *Zadvydas*, the Supreme Court “read § 1231 to authorize continued detention of an alien following the 90-day removal period for only such time as is reasonably necessary to secure the alien’s removal.” *Demore v. Kim*, 538 U.S. 510, 527 (2003) (citing *Zadvydas*, 533 U.S. at 699).

30. As the Supreme Court explained, where there is no possibility of removal, immigration detention presents substantive due process concerns because “the need to detain the noncitizen to ensure the noncitizen’s availability for future removal proceedings is “weak or nonexistent.” *Zadvydas*, 533 U.S. at 690-92. Detention is lawful only when “necessary to bring about that alien’s removal.” *See id.* at 689.

31. To balance these competing interests, the *Zadvydas* Court established a rebuttable presumption regarding what constitutes a “reasonable period of detention” for noncitizens after a removal order. *Id.* at 700-01. The Court determined that six months detention could be deemed a “presumptively reasonable period of detention,” after which the burden shifts to the government to justify continued detention if the noncitizen provides a “good reason to believe that there is not significant likelihood of removal in the reasonably foreseeable future.” *Id.* at 701.

32. Where a petitioner has provided “good reason to believe there is no significant likelihood of removal in the reasonably foreseeable future,” the burden shifts to the government to rebut that showing. *Zadvydas*, 533 U.S. at 701. Due deference is owed to the government’s assessment of the likelihood of removal and the time it will take to execute removal. *Id.* at 700. However, just as pro forma findings of dangerousness do not suffice to justify indefinite detention, pro forma statements that removal is likely should not satisfy the government’s

burden.

33. The government may only rebut a detainee's showing that there is no significant likelihood of removal in the reasonably foreseeable future with "evidence of progress...in negotiating a petitioner's repatriation." *Gebrelibanos v. Wolf*, No. 20-cv-1575-WQH-RBB, 2020 U.S. Dist. LEXIS 185302, at *9 (S.D. Cal., Oct. 6, 2020) (citing *Kim v. Ashcroft*, 02cv1524-J(LAB) (S.D. Cal., June 2, 2003), ECF No. 25 at 8 (citing *Khan v. Fasano*, 194 F. Supp. 2d 1134, 1136 (S.D. Cal. 2001); *Fahim v. Ashcroft*, 227 F. Supp. 2d 1359, 1366 (N.D. Ga. 2002)); *see also Carreno v. Gillis*, No. 5:20-cv-44-KS-MTP, 2020 U.S. Dist. LEXIS 248926, at *5 (S.D. Miss., Dec. 16, 2020) (granting petitioner's habeas claim because the government failed to show that removal would be imminent after obtaining a travel document and failing to remove petitioner within the document's validity period) (emphasis added).

34. Factors courts consider in analyzing the likelihood of removal include "the existence of repatriation agreements with the target country, the target country's prior record of accepting removed aliens, and specific assurances from the target country regarding its willingness to accept an alien." *Hassoun v. Sessions*, 2019 WL 78984 at *4 (W.D.N.Y., Jan. 2, 2019) (citing *Callender v. Shanahan*, 281 F. Supp. 3d 428, 436-37 (S.D.N.Y. 2017)); *see also Nma v. Ridge*, 286 F. Supp. 2d 469, 475 (E.D. Pa. 2003).

35. Other courts have denied habeas petitions primarily where the U.S. government has already procured petitioner's travel documents and only travel arrangements are outstanding, which is not the case here. *See Berhe*, 2019 WL 3734110 at *4 (denying Petitioner's habeas petition because "Eritrea has issued a travel document and Petitioner has presented no evidence to suggest there are other barriers to his removal"); *Tekleweini-Weldemichael v. Book*, No. 1:20-CV-660-P, 2020 WL 5988894, at *5 (W.D. La., Sept. 9, 2020), *report and recommendation adopted*, No. 1:20-CV-660-P, 2020 WL 5985923 (W.D. La., Oct. 8, 2020) (denying without

prejudice Petitioner's habeas petition because he possessed a travel document valid through December 19, 2020, and noting that he is not precluded from filing a new petition upon the expiration or cancellation of his travel document).

36. In this case, ICE has not provided Mr. Yaghoubi Yeganeh with any information regarding efforts to obtain a travel document from Iran. Moreover, ICE has not shown any meaningful progress in doing so. This is insufficient evidence for the government to meet its burden that there is a significant likelihood of removal in the reasonably foreseeable future. *See Gebrelibanos*, 2020 WL 5929487, at *3; *Tekleweini-Weldemichael*, 2020 WL 5988894 (finding significant likelihood of removal in reasonably foreseeable future *only because* government had already obtained a valid travel document).

37. Mr. Yaghoubi Yeganeh's removal period pursuant to 8 U.S.C. § 1231(a)(1)(A), and his presumptively reasonable post-removal period pursuant to 8 U.S.C. § 1231(a)(6), expired a decade ago. With neither a travel document nor an indication from Iran that one is soon to be forthcoming, detention is unreasonable, as removal is not imminent.

38. In addition, federal regulations dictate that where ICE detains an individual under 8 U.S.C. § 1231(a)(6), an individualized determination must be carried out, with the following criteria taken into account:

- (1) The nature and number of disciplinary infractions or incident reports received when incarcerated or while in Service custody;
- (2) The detainee's criminal conduct and criminal convictions, including consideration of the nature and severity of the alien's convictions, sentences imposed and time actually served, probation and criminal parole history, evidence of recidivism, and other criminal history;
- (3) Any available psychiatric and psychological reports pertaining to the detainee's mental health;
- (4) Evidence of rehabilitation including institutional progress relating to participation in work, educational, and vocational programs, where available;
- (5) Favorable factors, including ties to the United States such as the number

of close relatives residing here lawfully;

(6) Prior immigration violations and history;

(7) The likelihood that the alien is a significant flight risk or may abscond to avoid removal, including history of escapes, failures to appear for immigration or other proceedings, absence without leave from any halfway house or sponsorship program, and other defaults; and

(8) Any other information that is probative of whether the alien is likely to—

(i) Adjust to life in a community,

(ii) Engage in future acts of violence,

(iii) Engage in future criminal activity,

(iv) Pose a danger to the safety of himself or herself or to other persons or to property, or

(v) Violate the conditions of his or her release from immigration custody pending removal from the United States.

8 C.F.R. § 241.4(f).

39. In this case, DHS-ICE's Post-Order Custody Review decision denying release did not take these factors into account, and instead issued a pro forma, rubber-stamp decision justifying Petitioner's continued detention.

**FIRST CLAIM FOR RELIEF:
Violation of 8 U.S.C. § 1231(a)(6)**

40. Mr. Yaghoubi Yeganeh re-alleges and incorporates by reference the preceding paragraphs 1-39.

41. Mr. Yaghoubi Yeganeh's continued detention by the Respondents violates 8 U.S.C. § 1231(a)(6), as interpreted by *Zadvydas*. Mr. Yaghoubi Yeganeh's 90-day statutory removal period and six-month presumptively reasonable period for continued removal efforts have passed one decade ago, and no significant likelihood of removal exists in the reasonably foreseeable future.

42. Under *Zadvydas*, the continued detention of someone like Mr. Yaghoubi Yeganeh

is unreasonable and not authorized by 8 U.S.C. § 1231.

SECOND CLAIM FOR RELIEF:

Violation of the Due Process Clause of the Fifth Amendment to the U.S. Constitution

43. Mr. Yaghoubi Yeganeh re-alleges and incorporates by reference the preceding paragraphs 1-39.

44. Mr. Yaghoubi Yeganeh's detention during the removal period is only constitutionally permissible when there is a significant likelihood of removal in the reasonably foreseeable future. In Mr. Yaghoubi Yeganeh's case, Iran has not issued any travel documents for his removal; he has also not been recognized as a national of any other country. These factors lend support to the conclusion that there is no likelihood of Mr. Yaghoubi Yeganeh's removal in the reasonably foreseeable future. Respondents continue to detain Mr. Yaghoubi Yeganeh without evidence that Iran will ultimately issue a travel document and with no reason to believe that they will obtain a travel document within a reasonable amount of time. No significant likelihood of removal exists in the reasonably foreseeable future.

45. Respondents' detention of Mr. Yaghoubi Yeganeh no longer bears any reasonable relation to a legitimate government purpose, and thus violates the Due Process Clause.

THIRD CLAIM FOR RELIEF:

Violation of Regulations

46. Mr. Yaghoubi Yeganeh re-alleges and incorporates by reference the preceding paragraphs 1-39.

47. As set forth above, Respondents continue to detain Mr. Yaghoubi Yeganeh in violation of 8 C.F.R. § 241.4, having not considered the substantive factors set forth in subsections (e) and (f) of that regulation. Were such factors to be properly weighed, it would be apparent that Mr. Yaghoubi Yeganeh is a candidate for release on an Order of Supervision pending removal.

48. Likewise, Respondents continue to detain Mr. Yaghoubi Yeganeh in violation of 8 C.F.R. §§ 241.4 and 241.13, since the proper procedures set forth in those regulations have not been carried out.

49. Finally, Respondents' actions in revoking Petitioner's Order of Supervision and re-arresting Petitioner without any advance or contemporaneous explanation of the legal or factual basis for re-detention violated 8 C.F.R. § 241.4(*l*), a regulation designed to protect the due process rights of noncitizens like Petitioner and – as this regulation pertains to continued detention, conditions for release, and revocation of release – directly impacting Petitioner's individual liberty interest. Respondents had no legal basis under the regulations to revoke Petitioner's Order of Supervision or re-arrest Petitioner, and such action was taken by an official who lacked authority to do so under 8 C.F.R. § 241.4(*l*)(2). Respondents failed to comply with their own rules when they revoked Petitioner's Order of Supervision and re-detained him. The Notice of Revocation should be vacated, and the Order of Supervision restored.

PRAYER FOR RELIEF

50. Mr. Yaghoubi Yeganeh respectfully requests that this Court assume jurisdiction over this matter and enter an order:

- a) Declaring that Mr. Yaghoubi Yeganeh's arrest and continued detention violated federal law and his due process rights;
- b) Granting the writ of habeas corpus and ordering Respondents to release Mr. Yaghoubi Yeganeh from detention forthwith, on an Order of Supervision pursuant to 8 U.S.C. § 1231(a)(3);
- c) Restoring Mr. Yaghoubi Yeganeh's former Order of Supervision; and
- d) Granting any other relief that this Court deems just and proper.

Respectfully submitted,

Date: July 21, 2025

//s//

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Certificate of Service

I, Simon Sandoval-Moshenberg, hereby certify that on this 21th day of July, 2025, I uploaded the foregoing, with all attachments thereto, to this court's CM/ECF system, which will send a Notice of Electronic Filing (NEF) to all case participants. I furthermore will send a copy by certified U.S. mail, return receipt requested, to:

Bluebonnet Detention Facility
400 2nd Street
Anson, TX 79501

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List of exhibits

- Ex. A) EOIR Automated Case Information System.
- Ex. B) Form I-220B Order of Supervision and personal report record.
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- Ex. G) Mr. Yaghoubi Yeganeh medical records, Bluebonnet Detention Facility.
- Ex. H) ICE Decision to Continue Detention.