

Sabrina Damast (CA SBN #305710 and NY SBN #5005251)
Amy Lenhert (CA Bar #227717)
Rocio La Rosa (CA Bar #314831)
Law Office of Sabrina Damast, Inc.
510 West 6th Street, Suite 330
Los Angeles, CA 90014
Telephone: (323) 475-8716
Emails: sabrina@sabrinadamast.com
amy@sabrinadamast.com
rocio@sabrinadamast.com

Counsel for Petitioner
Ovanes Gazazyan

UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA

Ovanes Gazazyan, A 

Petitioner,
v.

No. 5:25-cv-02599-SRM-DTB

PAMELA BONDI, in her official capacity as
Attorney General,

**DECLARATION OF
SABRINA DAMAST**

KRISTI NOEM, in her official capacity as
Secretary of the Department of Homeland
Security,

U.S. DEPARTMENT OF HOMELAND
SECURITY,

F. SEMAIA, in his official capacity as Warden of
Adelanto Detention Facility,

ERNESTO SANTACRUZ, JR., in his official
capacity as Acting ICE Field Office Director,
Respondents.

1. I make the following statement under penalty of perjury.

- 1 2. My name is Sabrina Damast. I am counsel for Petitioner Ovanes Gazazyan.
- 2 3. In my conversations with both the Petitioner and his family, I have been told
- 3 that Mr. Gazazyan was in immigration custody at the time he was ordered
- 4 removed and remained in custody for some period of time thereafter.
- 5 4. I am representing a noncitizen in a separate habeas petition who, like Mr.
- 6 Gazazyan, was born in the USSR in what is presently Armenia.
- 7 5. During the course of that separate litigation, I have spoken directly to the
- 8 Consul General for Armenia in Glendale, California, Ms. Anna Poghosyan,
- 9 regarding travel documents and recognition of citizenship for those born in
- 10 the former USSR in what is presently Armenia.
- 11 6. On July 31, 2025, Ms. Poghosyan informed me that it would not be lawful
- 12 for the consulate to issue a certificate of return (the official title for a travel
- 13 document) to an individual who is not an Armenian citizen.
- 14 7. On September 10, 2025, Ms. Poghosyan reiterated that travel documents are
- 15 only issued to citizens of Armenia.
- 16 8. In terms of the process for recognizing Armenian citizenship, Ms. Poghosyan
- 17 explained to me that recognition of citizenship of those born in the territory
- 18 of the USSR that now constitutes the Republic of Armenia is not automatic.
- 19 Moreover, she stated it can take potentially take months to adjudicate such an
- 20 application – there is no definitive timeline for a decision.
- 21

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21

Dated: October 3, 2025

Signed: s/ Sabrina Damast