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UNITED STATES DISTRICT COURT FOR THE  
CENTRAL DISTRICT OF CALIFORNIA  
EASTERN DIVISION

Kazem Majd

Petitioner,  
v.

Mark Bowen, Warden, Adelanto Detention  
Facility,

Respondents.

**PETITION FOR WRIT OF  
HABEAS CORPUS**

A No. 

**INTRODUCTION**

Petitioner is 77 years old and originally from Iran. Petitioner has lived in the United States for nearly sixty years. He suffers from serious and life-threatening medical issues. On December 11, 2025, he was detained at his ICE check-in and is now detained at the Adelanto Detention Facility.

1 In 2004, Petitioner was ordered removed then placed on an Order of  
2 Supervision (OSUP). Petitioner never violated his OSUP and has no criminal  
3 arrests or convictions since his removal order. Despite this, Petitioner was  
4 detained on December 11, 2025, at his ICE check-in.  
5

6 This habeas petition is based upon the fact that (1) the 90 day removal period  
7 has long since passed; (2) that Petitioner is able to rebut the presumption articulated  
8 under *Zadvydas v. Davis*, 533 U.S. 678 (2001) because his removal to Iran is not  
9 likely; (3) that ICE failed to follow procedure when it detained him, in violation of  
10 his Due Process rights; that (4) the decision to detain Petitioner was improper,  
11 given that there is no significant likelihood of removal to Iran; and that (5) the  
12 decision to detain Petitioner is in violation of his rights, because he is medically  
13 disabled and the government can reach the same aims through reasonable  
14 accommodations not requiring physical detention.

15 Accordingly, Petitioner respectfully petitions this Court for a writ of habeas  
16 corpus ordering his immediate release under appropriate conditions of supervision,  
17 or any other appropriate order.  
18

### 19 JURISDICTION

20 This action arises under the Constitution of the United States and the  
21 Immigration and Nationality Act (INA), 8 U.S.C. § 1101 *et seq.*

1 This Court has subject matter jurisdiction under 28 U.S.C. § 2241 (habeas  
2 corpus), 28 U.S.C. § 1331 (federal question), and Article I, § 9, cl. 2 of the United  
3 States Constitution (Suspension Clause). Jurisdiction is proper because Petitioner  
4 challenges the legality of his continued civil immigration detention under 8 U.S.C.  
5 § 1231(a) and the Constitution, and no statute strips this Court of jurisdiction to  
6 review such claims.

7  
8 This Court may grant relief under the habeas corpus statutes, 28 U.S.C. §  
9 2241 et. seq., the Declaratory Judgment Act, 28 U.S.C. § 2201 et seq., and the All  
10 Writs Act, 28 U.S.C. § 16.

### 11 VENUE

12  
13 Venue is proper in the United States District Court for the Central District of  
14 California pursuant to 28 U.S.C. § 1391(e) and 28 U.S.C. § 2241 because Petitioner  
15 is currently detained at the Adelanto Detention Facility, located in Adelanto,  
16 California, which lies within the jurisdiction of this District.

17 In addition, venue is proper because a substantial part of the events and  
18 omissions giving rise to the claims occurred in this District, including Petitioner's  
19 current and ongoing detention. Respondents is an officer or agent of the United  
20 States, and no real property is involved in this action.

**REQUIREMENTS OF 28 U.S.C. § 2243**

The Court must grant the petition for writ of habeas corpus or issue an order to show cause (OSC) to the 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.* (emphasis added).

Courts have long recognized the significance of the habeas statute in protecting individuals from unlawful detention. The Great Writ has been referred to as “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) (emphasis added). Given that Petitioner is currently physically detained, an expedited timeline for briefing and adjudication is appropriate under the statute.

**PARTIES**

Petitioner is a noncitizen from Iran and is detained at the Adelanto Detention Facility in Adelanto, California. He is in custody and under the direct control of Respondent.

Respondent Mark Bowen is the Warden of Adelanto Detention Facility in Adelanto, CA, has immediate physical custody of Petitioner pursuant to the facility’s contract with U.S. Immigration and Customs Enforcement to detain

1 noncitizens. Respondent, Warden of Adelanto Detention Facility, is a legal  
2 custodian of Petitioner.

3 **STATEMENT OF FACTS**

4  
5 Petitioner Kazem Majd is a 77-year-old male born on [REDACTED] in Iran.

6 Petitioner has lived in the United States since approximately the 1960's and became  
7 a lawful permanent resident of the United States around 1973.

8 Petitioner has not returned to Iran since 1976, and fears persecution because his

9 [REDACTED]  
10 Counsel is informed and believes that as the result of a fraud-related conviction, he  
11 was placed in removal proceedings.

12  
13 Petitioner never filed for asylum or any relief while in removal proceedings.  
14 During that time, he could not afford an attorney. In July 2004, Petitioner was  
15 ordered removed to Iran. In August 2004, he filed a motion to reopen his removal  
16 matter, but that motion was denied. No appeals were filed and no motion to reopen  
17 is pending challenging the removal order at this time. Because he thought he was  
18 allowed to remain in the United States, he sought no other legal action challenging  
19 his removal order.  
20  
21

1 As a result of the lack of diplomatic relations between the United States and  
2 Iran, Petitioner's removal could not be executed. Petitioner was placed on an Order  
3 of Supervision in 2004 and has dutifully reported each year. Petitioner has never  
4 missed a check-in. Nor has Petitioner ever violated any terms or conditions of his  
5 Order of Supervision.

6  
7 The political and diplomatic situation vis-à-vis Iran and the United States  
8 remains unchanged. The United States and Iran have had no diplomatic relations  
9 since 1980. There is no Iranian embassy in the United States and no U.S. embassy  
10 in Iran. Both countries view one another as hostile.

11 Petitioner holds no valid Iranian passport and has never applied for, or was ever  
12 issued, an Iranian passport under the Islamic Republic. He holds no travel  
13 documents. Petitioner has misplaced his original Iranian birth certificate, which  
14 was issued by the ancien régime when Iran was ruled by the Shah.

15 Even if Petitioner were to locate his original Iranian birth certificate, the Islamic  
16 Republic of Iran does not recognize old birth certificates issued under the  
17 monarchy, and a special process is required to obtain a new *shennasnameh*  
18 (identification document / birth certificate) from Iran, which requires giving  
19 someone power of attorney in Iran to obtain such a document from Iran's National  
20 Organization of Civil Registration.

1 The United States Department of State visa reciprocity schedule for Iran notes  
2 “Renewals of old birth certificates or replacements of lost birth certificates are  
3 available by applying *in person* at the registry office.” *See*  
4 [https://travel.state.gov/content/travel/en/us-visas/Visa-Reciprocity-and-Civil-](https://travel.state.gov/content/travel/en/us-visas/Visa-Reciprocity-and-Civil-Documents-by-Country/IranIslamicRepublicof.html)  
5 [Documents-by-Country/IranIslamicRepublicof.html](https://travel.state.gov/content/travel/en/us-visas/Visa-Reciprocity-and-Civil-Documents-by-Country/IranIslamicRepublicof.html).  
6

7 Obtaining an Iranian passport is predicated upon a valid birth certificate. Given  
8 this, it is unlikely that Petitioner or Respondent will be able to obtain any travel  
9 documents or passport for Petitioner. The Iranian Interest Section also notes that  
10 an original Iranian birth certificate is needed for passport issuance. *See* Exhibit A.  
11 It also requires an original National ID card, proof of military service or exemption,  
12 and recent photographs. *Id.* Petitioner has none of these.

13 Petitioner appeared for a pre-scheduled ICE check-in on November 13, 2025.  
14 During that check-in, Petitioner provided ICE with medical letters. ICE asked  
15 Petitioner for a list of medications he was taking and noted them. ICE then  
16 instructed Petitioner to pick-up a monitoring device in lieu of detention, which he  
17 did. The ankle monitoring device was kept on Petitioner for about two weeks, but  
18 then it was removed with permission from ICE due to Petitioner’s regular MRI and  
19 MRCP scans, which are done every month to monitor his liver.  
20  
21

1 ICE concluded that they would not detain Petitioner due to medical reasons  
2 because they could not treat him while in detention. Petitioner was then instructed  
3 to return on December 11, 2025 where he would be given a new reporting schedule.  
4

5 On December 11, 2025 Petitioner appeared at the Santa Ana ICE location as  
6 instructed. Petitioner did not bring any medications because he was informed he  
7 would not be detained. However, Petitioner was detained during that check-in.

8 Petitioner was given no reason for his detention, nor an opportunity to  
9 respond, or formal or informal interview. In fact, Petitioner's detention was in  
10 contradiction to what he was told in November, in that he would not be detained as  
11 a result of his medical condition.

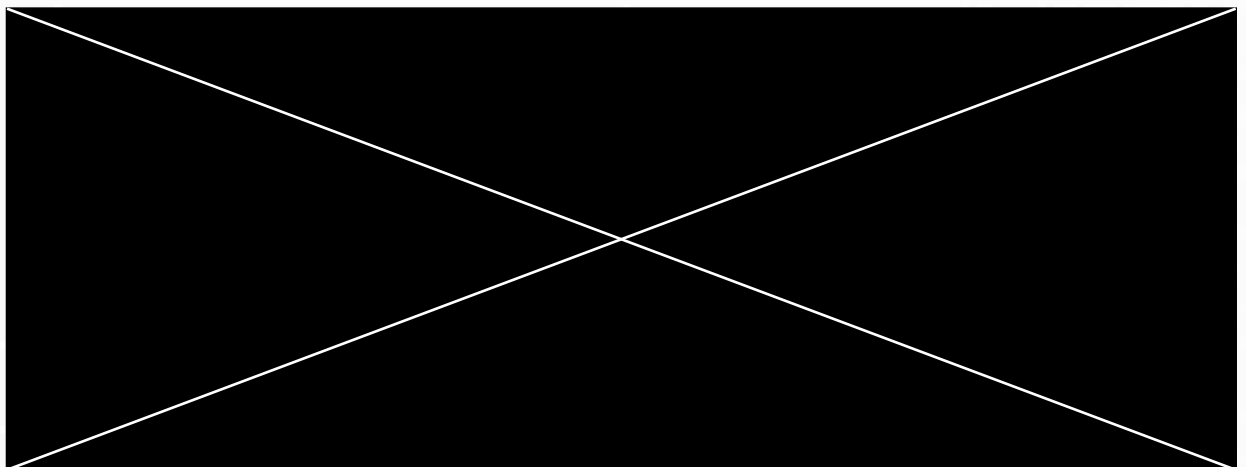
12  
13 **A. Serious Medical Conditions and Advanced Age**

14 Petitioner suffers from complex, chronic, and progressive medical conditions  
15 that require specialized medical oversight not available in a detention setting.  
16 Specifically, Petitioner was diagnosed with Primary Sclerosing Cholangitis (PSC)  
17 in 2021, a rare and life-threatening liver disease characterized by inflammation and  
18 scarring of the bile ducts. According to his liver specialist, Dr. Paul J. Pockros, this  
19 condition can advance unpredictably, leading to cirrhosis, liver failure, and death  
20 without consistent, specialized surveillance. Dr. Pockros explicitly states that PSC  
21

1 “is not a condition that can be managed casually or without specialized medical  
2 oversight,” and it is medically necessary for Petitioner to remain under the care of a  
3 liver specialist. *See* Exhibit B.

4  
5 In addition to his liver condition, Petitioner suffers from severe, advanced  
6 Diabetes Mellitus requiring intensive daily management, including insulin therapy  
7 and weekly GLP-1 injections. *Id.* He also requires the nightly use of a C-PAP  
8 machine for Chronic Obstructive Sleep Apnea to prevent dangerous sequelae such  
9 as cardiovascular strain. Furthermore, due to a history of emergent gallbladder  
10 removal, he requires a special diet to avoid gastrointestinal distress, which is  
11 difficult to maintain in a detention facility. His primary care physician, Dr. David  
12 Miller, has warned that these conditions are “potentially life-threatening if not  
13 carefully managed.” *See* Exhibit C.

14 Petitioner also regularly takes the following medications:



1           Petitioner has requested but has yet to receive the necessary medical care or  
2 medicine as a result of his serious and life-threatening medical conditions.  
3           Petitioner's condition is also specialized, in that the doctors within the detention  
4 facility are unable to treat them. Since he was detained, Petitioner has not been  
5 able to see a doctor, has only been provided generic diabetes medication, with no  
6 treatment or medication related to his PSC. Petitioner's medical care prior to  
7 detention involved almost weekly doctor's visits, monthly laboratory tests and  
8 other medical diagnosing scans such as MRIs.

9  
10           Continued detention at the Adelanto Detention Facility poses a grave risk to his  
11 health and life.

12           **B. Petitioner is Not a Flight Risk or a Danger to the Community**

13  
14           Petitioner has a documented history of exemplary compliance with his Order  
15 of Supervision spanning over two decades. Records indicate he has consistently  
16 reported to immigration officials since at least 2004, with check-ins occurring on a  
17 regular basis through 2025. *See* Exhibit E.

18           His November 6, 2024 check-in explicitly notes that system checks showed “  
19 “no new/derogatory information,” “no wants,” and “no warrants.” *Id.* Petitioner  
20 has lived at the same address in California for many years. Given his advanced age  
21

1 of 77, his severe medical fragility, and his twenty-year history of compliant  
2 reporting, Petitioner presents absolutely no risk of flight or danger to the  
3 community.

4  
5 **C. Procedural Violations of 8 C.F.R. §§ 241.4 and 241.13**

6 Despite his compliance, Petitioner was taken into custody on December 11,  
7 2025, during a routine check-in. ICE failed to provide Petitioner with a specific  
8 reason for the revocation of his release or an opportunity to be heard regarding his  
9 detention. The agency did not conduct a formal or informal interview to assess his  
10 suitability for release in violation of the procedures outlined in 8 C.F.R. §§ 241.4  
11 and 241.13. Nor was Petitioner given an opportunity to respond to the decision to  
12 detain him. His detention occurred without advance notice and came as a surprise  
13 to himself and his family, who were previously told by ICE he would not be  
14 detained due to his medical condition.

15 Furthermore, given that there is no significant likelihood of his removal in  
16 the reasonably foreseeable future due the lack of a passport, travel documents, or  
17 birth certificate and the difficulty in obtaining these, his detention violates the due  
18 process protections codified in 8 C.F.R. § 241.13.  
19  
20  
21

**D. Irreparable Harm to U.S. Citizen Partner and Daughter**

Petitioner's detention does not stand in isolation and causes irreparable harm to his U.S. citizen partner, Carolyn Majd. Mrs. Majd is 74 years old, disabled, and relies solely on Petitioner for her daily care. She recently underwent spinal fusion surgery in July 2024, utilizes a walker, and has a history of falls. Following a serious auto accident in 2023, she no longer drives and depends entirely on Petitioner for transportation to medical appointments, the pharmacy, and the grocery store. *See* Exhibit F.

Mrs. Majd also suffers from Ulcerative Colitis, which requires stress management to prevent intestinal blockages; the stress of her partner's detention exacerbates her condition, evidenced by her multiple hospitalizations in early 2024. Petitioner is her only support system, and his continued detention leaves a vulnerable U.S. citizen without essential care. *Id.*

Petitioner's US citizen daughter also suffers as a result of her father's detention. She notes that her 77-year-old father serves as the primary source of physical and financial support for his partner, a handicapped United States citizen who relies on him for daily assistance. *See* Exhibit G. Ms. Majd declares that his detention has stripped this vulnerable family member of her essential caregiver, forcing Ms. Majd to assume these heavy responsibilities herself. *Id.* She notes that

1 this sudden shift in caretaking duties has created significant hardship on her and  
2 effectively destabilized their family unit. *Id*

3  
4 **Petitioner's liberty has been restrained since he was ordered removed**  
5 **and placed on an Order of Supervision in 2004**

6 Petitioner has been under an Order of Supervision (OSUP) since 2004. That  
7 supervision included regular check-ins, movement restrictions, and ongoing  
8 compliance obligations that significantly restrained his liberty. As such, he was in  
9 “custody” for purposes of habeas jurisdiction and constitutional review. The  
10 Supreme Court has long recognized that habeas “custody” includes legal restraints  
11 short of incarceration. Similarly, in *Rumsfeld v. Padilla*, 542 U.S. 426, 437 (2004),  
12 the Court reiterated that “[o]ur understanding of custody has broadened to include  
13 restraints short of physical confinement.” *Id*.

14 In this case, the government has had over two decades to effectuate his  
15 removal. Despite that time, it has failed to obtain travel documents, identify a  
16 receiving country, or present any evidence that removal is likely. This failure,  
17 especially in light of the government’s continued exercise of civil custody,  
18 constitutes not merely a practical obstacle but a violation of the constitutional limits  
19 set forth in *Zadvydas*.  
20

Petitioner has shown good reason to believe that removal is not significantly likely in the reasonably foreseeable future.

## **LEGAL FRAMEWORK**

### **Post-Removal Order and Detention**

Under the Immigration and Nationality Act (INA), a noncitizen subject to a final order of removal is generally detained during a 90-day “removal period.” *See* 8 U.S.C. § 1231(a)(1)(A). Detention during this period is typically mandatory. *See* § 1231(a)(2). However, if removal is not effectuated during the removal period, continued detention is permissible only while removal remains reasonably foreseeable. *See* § 1231(a)(6).

In *Zadvydas v. Davis*, 533 U.S. 678 (2001), the Supreme Court held that 8 U.S.C. § 1231(a)(6) does not authorize indefinite detention. Instead, the Court interpreted the statute in light of constitutional due process and established a presumptive six-month limit on post-order detention. After that period, if the noncitizen shows “good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future,” the burden shifts to the government to rebut that showing. *Id.* at 701.

1           The Court later affirmed in *Clark v. Martinez*, 543 U.S. 371 (2005), that this  
2           limitation applies universally, regardless of the underlying reasons for the  
3           government's inability to remove the noncitizen. Where removal is not reasonably  
4           foreseeable—whether due to diplomatic barriers, lack of travel documents, or other  
5           practical impossibilities—continued detention violates both the statute and the  
6           Constitution.

7  
8           In some circumstances, federal immigration authorities can continue to  
9           detain an alien beyond the initial removal period. Specifically, section 1231(a)(6)  
10          allows the government to detain certain enumerated classes of immigrants—  
11          including those ordered removed due to criminal convictions—for more than 90  
12          days. *Id.* 8 U.S.C. § 1231(a)(6). In *Zadvydas*, 533 U.S. 678, the Court addressed the  
13          question of how long the government can detain an immigrant pursuant to section  
14          1231(a)(6).

15          The *Zadvydas* Court began by rejecting the government's position that  
16          section 1231(a)(6) permitted indefinite detention following the initial removal  
17          period. *See id.* It held that “[a] statute [that] permit[ed] indefinite detention of an  
18          alien would raise a serious constitutional problem,” *id.* at 690, and instead  
19          determined that section 1231(a)(6) “implicitly limits an alien’s detention to a period  
20          reasonably necessary to bring about that alien’s removal,” *id.* at 679. Thus, “once  
21

1 removal is no longer reasonably foreseeable, continued detention is no longer  
2 authorized by [section 1231(a)(6)].” *Id.* at 699.

3  
4 The Court went on to institute a framework that would govern future  
5 challenges to section 1231(a)(6) detention. “[F]or the sake of uniform  
6 administration in the federal courts,” the Court found that post-removal detention  
7 was “presumptively reasonable” for the first six months. *Id.* at 700-01. When that  
8 “presumptively reasonable” six-month period ends, aliens seeking release from  
9 custody bear the initial burden of providing “good reason to believe that there is no  
10 significant likelihood of removal in the reasonably foreseeable future.” *Id.* at 701.  
11 Once that initial showing is made, the burden shifts to the government to respond  
12 with evidence sufficient to rebut it. *See id.*

13 Upon release from custody, a noncitizen subject to a final order of removal  
14 must comply with certain conditions of release. 8 U.S.C. § 1231(a)(3), (6). The  
15 revocation of that release is governed by 8 C.F.R. § 241.13(i), which authorizes  
16 ICE to revoke a noncitizen’s release for purposes of removal.

17  
18 ICE may revoke a noncitizen’s release and return them to ICE custody due to  
19 failure to comply with any of the conditions of release, 8 C.F.R. § 241.13(i)(1), or  
20 if, “on account of changed circumstances, the Service determines that there is a  
21

1       *significant likelihood* that the [noncitizen] may be removed in the reasonably  
2       foreseeable future,” *id.* § 241.13(i)(2) (emphasis added).

3  
4       Upon such a determination by ICE to detain, “the alien will be notified of the  
5       reasons for revocation of his or her release. [ICE] will conduct an initial informal  
6       interview promptly after his or her return to [ICE] custody to afford the alien an  
7       opportunity to respond to the reasons for revocation stated in the notification. The  
8       [noncitizen] may submit any evidence or information that he or she believes shows  
9       there is no significant likelihood he or she be removed in the reasonably foreseeable  
10      future, or that he or she has not violated the order of supervision. The revocation  
11      custody review will include an evaluation of any contested facts relevant to the  
12      revocation and a determination whether the facts as determined warrant revocation  
13      and further denial of release.” *Id.* § 241.13(i)(3).

14       ICE’s decision to detain is governed by the factors laid out in 8 C.F.R. §  
15      241.13(f), including “the history of the [noncitizen’s] efforts to comply with the  
16      order of removal, the history of [ICE’s] efforts to remove [noncitizens] to the  
17      country in question or to third countries, including the ongoing nature of [ICE’s]  
18      efforts to remove [the noncitizen] and the [noncitizen’s] assistance with those  
19      efforts, the reasonably foreseeable results of those efforts, and the views of the  
20      Department of State regarding the prospects for removal of [noncitizens] to the  
21

country or countries in question.” *See also Phan v. Beccerra*, No. 2:25-CV-01757-DC-JDP, 2025 WL 1993735, at \*3 (E.D. Cal. July 16, 2025).

A court may not make this determination in the first instance but may review it for compliance with the regulation. *See id.*; *Nguyen v. Hyde*, No. 25-cv-11470-MJJ, 2025 WL 1725791, at \*3 (D. Mass. June 20, 2025) (citing *Kong v. United States*, 62 F.4th 608, 620 (1st Cir. 2023)).

### **Third Country Removals**

The immigration laws delineate the proper procedures by which a country may be designated for removal. *See* 8 U.S.C. § 1231(b). These procedures move in incremental steps.

First, an individual with a removal order may designate the country to which they want to be removed, and the government shall remove the alien to that country. *Id.* § 1231(b)(2)(A). The government may disregard that designation if (1) the individual fails to designate a country promptly; (2) the government of that country does not inform the U.S. government finally, within 30 days after the date the U.S. government first inquires, whether the government will accept the individual into that country; (3) the government of the country is not willing to

1 accept the alien into the country; or (4) the government decides that removing the  
2 individual to that country is prejudicial to the United States. *Id.* § 1231(b)(2)(C).

3  
4 Second, if the individual is not removed to the country they designated under  
5 section 1231(b)(2)(A), the government shall remove the individual to the country of  
6 which the individual is a “subject, national, or citizen” unless the government of  
7 that country does not inform the U.S. government or the individual within 30 days  
8 after first inquiry or within another reasonable period of time whether the  
9 government will accept the individual into the country or the country is not willing  
10 to accept the individual into the country. *Id.* § 1231(b)(2)(D).

11 Third, if the individual is not removed to either the country of their  
12 designation or the country of which they are a subject, national, or citizen then the  
13 government shall remove them to any of the following options: (1) the country  
14 from which the individual was admitted to the United States; (2) the country in  
15 which is located the foreign port from which the individual left for the United  
16 States or for a foreign territory contiguous to the United States; (3) the country in  
17 which the individual resided before the individual entered the United States and  
18 from which the individual entered the United States; (4) the country in which the  
19 individual was born; or (5) the country in which the individual’s birthplace is  
20 located when the individual was ordered removed. *Id.* § 1231(b)(2)(E). Only “[i]f  
21

1 impracticable, inadvisable, or impossible” to remove the individual to any of these  
2 countries may the government remove the individual to “another country whose  
3 government will accept [them] into that country.” *Id.* § 1231(b)(2)(E)(vii).

4  
5 Notwithstanding any of these procedures, the statute prohibits removal to a  
6 third country where a person may be persecuted or tortured, a form of protection  
7 known as withholding of removal. *See id.* § 1231(b)(3)(A). The government “may  
8 not remove [a noncitizen] to a country if the Attorney General decides that the  
9 [noncitizen’s] life or freedom would be threatened in that country because of the  
10 [noncitizen’s] race, religion, nationality, membership in a particular social group, or  
11 political opinion.” *Id.*; see also 8 C.F.R. §§ 208.16, 1208.16. Withholding of  
12 removal is a mandatory protection.

13 Similarly, Congress codified protections enshrined in the Convention  
14 Against Torture prohibiting the government from removing a person to a country  
15 where they would be tortured. See FARRA 2681-822 (codified as 8 U.S.C. § 1231  
16 note) (“It shall be the policy of the United States not to expel, extradite, or  
17 otherwise effect the involuntary return of any person to a country in which there are  
18 substantial grounds for believing the person would be in danger of being subjected  
19 to torture, regardless of whether the person is physically present in the United  
20  
21

1 States.”); 28 C.F.R. § 200.1; *id.* §§ 208.16-208.18, 1208.16-1208.18. CAT  
2 protection is also mandatory.  
3

4 To comport with the requirements of due process, the government must  
5 provide notice of the third country removal and an opportunity to respond. Due  
6 process requires “written notice of the country being designated” and “the statutory  
7 basis for the designation, i.e., the applicable subsection of § 1231(b)(2).” *Aden v.*  
8 *Nielsen*, 409 F. Supp. 3d 998, 1019 (W.D. Wash. 2019); *see also D.V.D. v. U.S.*  
9 *Dep’t of Homeland Sec.*, No. 25-cv-10676-BEM, 2025 WL 1453640, at \*1 (D.  
10 Mass. May 21, 2025) (“All removals to third countries, i.e., removal to a country  
11 other than the country or countries designated during immigration proceedings as  
12 the country of removal on the non-citizen’s order of removal, must be preceded by  
13 written notice to both the non-citizen and the non-citizen’s counsel in a language  
14 the non-citizen can understand.” (citation omitted)); *Andriasian v. INS*, 180 F.3d  
15 1033, 1041 (9th Cir. 1999) (due process requires notice to the noncitizen of the  
16 right to apply for asylum and withholding to the country where they will be  
17 removed). The government must be able to show evidence that the third country  
18 will accept the individual into that country. *See Himri v. Ashcroft*, 378 F.3d 932,  
19 939 (9th Cir. 2004) (when “at the time the government proposes a country of  
20  
21

1 removal pursuant to § 1231(b)(2)(E)(vii), the government must be able to show that  
2 the proposed country will accept the [individual]”).

3  
4 Due process also demands that the government “ask the noncitizen whether  
5 he or she fears persecution or harm upon removal to the designated country and  
6 memorialize in writing the noncitizen’s response. This requirement ensures DHS  
7 will obtain the necessary information from the noncitizen to comply with section  
8 1231(b)(3) and avoids [a dispute about what the officer and noncitizen said].”

9 *Aden*, 409 F. Supp. 3d at 1019; *cf. D.V.D.*, 2025 WL 1453640, at \*1 (“Following  
10 notice, the individual must be given a meaningful opportunity, and a minimum of  
11 ten days, to raise a fear-based claim for CAT protection prior to removal.”  
12 (emphasis omitted)).

13 If the noncitizen claims fear, measures must be taken to ensure that the  
14 noncitizen can seek asylum, withholding, and relief under CAT before an  
15 immigration judge in reopened removal proceedings. *Cf. D.V.D.*, 2025 WL  
16 1453640, at \*1 (requiring the government to move to reopen the noncitizen’s  
17 immigration proceedings if the individual demonstrates “reasonable fear” and to  
18 provide “a meaningful opportunity, and a minimum of fifteen days, for the non-  
19 citizen to seek reopening of their immigration proceedings” if the noncitizen is  
20 found to not have demonstrated “reasonable fear”); *Aden*, 409 F. Supp. 3d at 1019

1 (requiring notice and time for a respondent to file a motion to reopen and seek  
2 relief).

3  
4 Finally, notice of the country to which the noncitizen will be removed must  
5 not be “last minute” because that would deprive an individual of a meaningful  
6 opportunity to apply for fear-based protection from removal. *Andriasian*, 180 F.3d  
7 at 1041. They must have time to prepare and present relevant arguments and  
8 evidence and to seek reopening of their removal case.

9 **Punitive Removal Practices**

10 It is bedrock law that the U.S. government may not impose or inflict an  
11 infamous punishment for violations of civil immigration law. In 1896, the U.S.  
12 Supreme Court ruled that while deportation itself was not a punishment, the  
13 government could not attach punitive conditions to deportation—in that case,  
14 imprisonment at hard labor—absent a criminal charge, trial in a court of law, and  
15 the protections of the Fifth, Sixth, and Eighth Amendments. *Wong Wing v. United*  
16 *States*, 163 U.S. 228, 237 (1896).

17  
18 Importantly, the Court drew a distinction between deportation, which the  
19 Court reasoned is “not a ‘banishment,’ in the sense in which that word is often  
20 applied to the expulsion of a citizen from his country by way of punishment,” and  
21

1 government actions aimed at punishment, such as imprisonment at hard labor in  
2 addition to deportation. *Id.* at 236. The Court explained that deportation “is but a  
3 method of enforcing the return to his own country of an alien who has not complied  
4 with the conditions upon the performance of which the government of the nation,  
5 acting within its constitutional authority and through the proper departments, has  
6 determined that his continuing to reside here shall depend.” *Id.* (quoting *Fong Yue*  
7 *Ting v. United States*, 149 U.S. 730 (1893)). But the Court admonished that the  
8 government may not “declare unlawful residence within the country to be an  
9 infamous crime, punishable by deprivation of liberty and property . . . unless  
10 provision were made that the fact of guilt should first be established by a judicial  
11 trial.” *Id.* at 237.

12  
13 Deportation of individuals to third countries to be imprisoned or harmed is  
14 unquestionably punishment.

15 **Section 504 of the Rehabilitation Act**

16  
17 Under Section 504, found at 29 USCS § 794, a federally funded agency  
18 illegally discriminates against individuals with disabilities when it fails to provide  
19 “meaningful access” to its benefits, programs, or services. *Alexander v. Choate*,  
20 469 U.S. 287, 301 (1985); see also *Tennessee v. Lane*, 541 U.S. 509, 531 (2004).

1 Individuals are entitled to accommodation under Section 504 if they have a  
2 disability—a “physical or mental impairment that substantially limits one or more  
3 major life activities.” 42 U.S.C. § 12102(1).

4  
5 Section 504 requires federally funded programs to remedy a lack of  
6 meaningful access by providing reasonable accommodation. A proposed  
7 accommodation is reasonable if it does not fundamentally alter the nature of the  
8 federal program or impose an undue hardship. Reasonable accommodations  
9 should have been afforded to Petitioner in connection with his OSUP and  
10 immigration proceedings. It would not have been a “fundamental alteration” nor an  
11 “undue financial or administrative burden” for ICE to follow the law, not detain  
12 Petitioner without notice or warning and not act in a manner that completely  
13 disregarded the fact that he is a disabled individual. *Alexander*, 469 U.S. 287, 299-  
14 300, 302 n.21 (1985); *see also* 28 C.F.R. § 35.130(b)(1)(7)(i); 28 C.F.R. §  
15 35.150(a)(3); 6 CFR § 15.30 and § 15.50.

16 It is the government’s burden to prove that an accommodation is not  
17 necessary because it either poses a “fundamental alteration” or “undue financial or  
18 administrative burden.” *Id.* A fundamental alteration is one that changes an  
19 “essential aspect” of the program. *Cf. PGA Tour, Inc. v. Martin*, 532 U.S. 661-663  
20  
21

(2001) (discussing the distinction between a fundamental alteration and peripheral features of a program for a disabled golfer requesting the use of a golf cart.)

## **CLAIMS FOR RELIEF**

### **COUNT ONE**

#### **Violation of Fifth Amendment Right to Due Process**

The allegations in the above paragraphs are re-alleged and incorporated herein by reference.

1. Petitioner has been subject to a final order of removal since. The 90 day removal period applies to the 90 days immediately following the removal order. That period has long passed. The government has had ample time to effectuate removal but has failed to do so.
2. Respondent has failed to identify a third country willing to accept Petitioner, and there is no significant likelihood of removal in the reasonably foreseeable future.
3. Petitioner's continued detention beyond the 90-day removal period authorized by 8 U.S.C. § 1231(a), violates the Due Process Clause of the Fifth Amendment. The government's failure to justify continued detention with concrete evidence of likely removal renders this ongoing deprivation of liberty unconstitutional under *Zadvydas v. Davis*, 533 U.S. 678 (2001).

1  
2 4. Accordingly, Petitioner's continued detention violates his substantive due  
3 process rights under the Fifth Amendment to the United States Constitution.

4  
5 **COUNT TWO**

6 **Third Country Removal in Violation of 8 U.S.C. § 1231, Convention Against**  
7 **Torture, Implementing Regulations and the Administrative Procedures Act**

8 The allegations in the above paragraphs are re-alleged and incorporated herein by  
9 reference.

10 1. The Fifth Amendment, the INA, the CAT, and implementing regulations  
11 mandate meaningful notice and opportunity to respond to any attempt to  
12 remove Petitioner to a third country in reopened removal proceedings. They  
13 also require an opportunity for Petitioner to make a fear-based claim against  
14 removal to a third country in reopened removal proceedings. Respondents'  
15 policy for third country removals violates all of these laws because it directs  
16 ICE agents to remove individuals to third countries without any notice or  
17 process at all where diplomatic assurances are received and, where no  
18 diplomatic assurances are received, to provide flagrantly insufficient notice  
19 (6-24 hours) and opportunity to respond, in violation of the statute,  
20 regulations, and Fifth Amendment.  
21

- 1
2. Prior to any third country removal, Petitioner must be provided with
- 2
- constitutionally and statutorily compliant notice and an opportunity to
- 3
- respond and contest that removal if he has a fear of persecution or torture in
- 4
- that country in reopened removal proceedings.
- 5

6

**COUNT THREE**

7

**Unlawful Detention in Violation of the Fifth Amendment Due Process Clause,**

8

**Immigration and Nationality Act 8 CFR §§ 241.13 and 241.4, and the**

9

**Administrative Procedure Act (APA)**

- 10
1. The allegations in the above paragraphs are re-alleged and incorporated
- 11
- herein by reference.
- 12
2. Respondent's detention of Petitioner violates his rights guaranteed by the
- 13
- Due Process Clause of the Fifth Amendment of the U.S. Constitution; the
- 14
- INA, 8 U.S.C. § 1231(a); implementing regulations, 8 C.F.R. §§ 241.13 and
- 15
- 241.4; and the APA.
- 16
3. Petitioner should be released. "If removal is not reasonably foreseeable"—
- 17
- as is the case here—detention is "unreasonable and no longer authorized by
- 18
- statute." *Zadvydas*, 533 U.S. at 699-700 (citing 8 U.S.C. § 1231(a)(6)).
- 19
4. Neither the statute nor the Constitution authorizes Petitioner's continued
- 20
- detention where removal is not likely.
- 21

- 1           5. The six month presumption in *Zadvydas* is rebuttable. Petitioner can rebut  
2           the presumption that there “no significant likelihood of removal in the  
3           reasonably foreseeable future.” *Id.*; *Hoang Trinh v. Homan*, 333 F. Supp. 3d  
4           984, 994 (CD. Cal. 2018) (“The Supreme Court in *Zadvydas* outlined a  
5           ‘guide’ for approaching these detention challenges . . . not a prohibition on  
6           claims challenging detention less than six months.”)  
7  
8           6. Respondent violated governing regulations for revoking Petitioner’s Order of  
9           Supervision. Petitioner has duly complied with the conditions of his  
10          supervised release, including attending check-ins and providing the  
11          information and documentation requested of him. His release may be  
12          revoked only if there is a “*significant likelihood* that the alien may be  
13          removed.” 8 C.F.R. § 241.13(i)(2) (emphasis added). Upon such a  
14          determination, several procedural steps are required to revoke release, *id.* §  
15          241.13(i)(3), none of which were followed here. Respondents are required to  
16          follow their own regulations. *United States ex rel. Accardi v. Shaughnessy*,  
17          347 U.S. 260, 268 (1954). Petitioner’s removal is not significantly likely to  
18          occur in the reasonably foreseeable future. Since his removal order, the  
19          government has been unable to remove him. Petitioner has no valid  
20          passport, travel document or birth certificate. There is no evidence that Iran  
21

1 has or will issue travel documents for Petitioner or that he is even eligible to  
2 be removed. Accordingly, Respondents cannot meet their burden to show  
3 that removal is reasonably foreseeable, and this Court should order his  
4 immediate release.

5  
6 **COUNT FOUR**

7 **Punitive Third Country Banishment**

8 **Violation of Fifth and Eighth Amendments**

- 9 1. The allegations in the above paragraphs are re-alleged and incorporated  
10 herein by reference.
- 11 2. Under the Fifth Amendment of the U.S. Constitution, no person shall “be  
12 held to answer for a capital, or otherwise infamous crime, unless on a  
13 presentment or indictment of a Grand Jury;” “be subject for the same offence  
14 to be twice put in jeopardy of life or limb;” or “be deprived of life, liberty, or  
15 property, without due process of law.”
- 16 3. The Eighth Amendment provides that no “cruel and unusual punishments”  
17 may be inflicted.
- 18  
19 4. The U.S. Supreme Court long ago held that the government may not inflict  
20 upon individuals an “infamous punishment” in addition to deportation, as a  
21

1 penalty for an immigration violation, absent criminal charges, a judicial trial,  
2 and attendant constitutional protections. *Wong Wing*, 163 U.S. at 236-38.

3  
4 5. Petitioner was convicted and completed any sentence for his criminal  
5 conviction. His convictions made him removable from the United States, but  
6 his conviction does not authorize the government to inflict, as a matter of  
7 executive policy and discretion, additional punishment on him. Respondents'  
8 third country removal program is punitive in nature and execution. The  
9 government has arranged for third countries to receive deportees and  
10 imprison them on arrival, possibly indefinitely and often in abhorrent  
11 conditions. It has selected countries notorious for human rights abuses and  
12 instability for third country removal arrangements. It has targeted individuals  
13 with criminal convictions for third country removals where they will be  
14 imprisoned and harmed and publicly broadcast those removals to demonize  
15 and dehumanize the individuals subjected to these practices and strike fear in  
16 the immigrant community to send a message of retribution and deterrence.  
17 Respondent's third country removal program is more than a publicity stunt.  
18 The hundreds of individuals who have already been subjected to it, have  
19 been banished in foreign prisons upon arrival without charge and often  
20 without communication with the outside world, including their families and  
21

1 lawyers. Respondents may not subject Petitioner to its third country removal  
2 program designed to impose a severe punishment on its subjects. *See id.*  
3 Such conduct “shocks the conscience” under Fifth Amendment substantive  
4 due process, is cruel and unusual punishment, and may not be imposed  
5 without charge and a judicial trial.  
6

- 7 6. Respondents may not seek to remove Petitioner to a third country under their  
8 punitive banishment policy and practices.

9 **COUNT FIVE**

10 **Violation of the Rehabilitation Act § 504, 29 U.S.C. § 794**

- 11
- 12 1. Petitioner realleges and incorporates by reference each and every allegation  
13 contained in the preceding paragraphs as if set forth fully herein.
- 14 2. Section 504 requires that reasonable accommodations be made for  
15 Petitioner’s disabilities in connection with his immigration proceedings.
- 16 3. To state a claim under the Rehabilitation Act, Petitioner must show that: (1)  
17 he is a qualified individual with a disability; (2) the defendant is subject to  
18 one of the Acts; and (3) he was denied the opportunity to participate in or  
19 benefit from the defendant’s services, programs, or activities, or was  
20 otherwise discriminated against by the defendant because of his disability.  
21

1 4. Petitioner is disabled, Respondent is subject to the Act, and Petitioner was  
2 denied the opportunity to participate in a benefit or service of the  
3 Respondent, in that, his Order of Supervision was revoked without taking  
4 into consideration his medical conditions.

5  
6 5. Section 504 requires that reasonable accommodations be made for  
7 Petitioner's medical condition and disabilities in connection with his  
8 immigration proceedings. The government has violated Section 504 by  
9 subjecting Petitioner to re-detention rather than making reasonable  
10 modifications to its detention policy so as to avoid discrimination against  
11 individuals such as Petitioner who suffer from severe medical impairments.

12 **PRAYER FOR RELIEF**

13  
14 Wherefore, Petitioner respectfully requests this Court to grant the following:

- 15 1. Assume jurisdiction over this matter;
- 16 2. Order Respondents to immediately release Petitioner from custody;
- 17 3. Order that Respondents may not re-detain Petitioner without first following  
18 the statutory and regulatory procedures for revocation of release and without  
19 first obtaining agreement from the country of removal and obtaining travel  
20 documents.

1 4. Order that Respondents may not remove or seek to remove Petitioner to a  
2 third country without notice and meaningful opportunity to respond in  
3 compliance with the statute and due process in reopened removal  
4 proceedings;

5  
6 5. Order that Respondents may not remove Petitioner to any third country  
7 because Respondent's third country removal program seeks to impose  
8 unconstitutional punishment on its subjects, including imprisonment and  
9 other forms of harm;

10 6. Award costs and reasonable attorney fees under the Equal Access to Justice  
11 Act, 28 U.S.C. § 2412; and

12  
13 7. Order any and all other relief that the Court deems just and proper.

14 Respectfully submitted,

Dated: **December 16, 2025**

15 */s/ Ashkan Yekrangi*

16 Ashkan Yekrangi, Esq.  
17 *Counsel for Petitioner*  
18  
19  
20  
21

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

I represent Petitioner, Kazem Majd, 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 16<sup>th</sup> day of December, 2025.

s/Ashkan Yekrangi  
Ashkan Yekrangi

*Counsel for Petitioner*

# EXHIBIT A

**CERTIFICATE OF TRANSLATION**

I, Nazanin Kiani, am competent to translate from  
(name of translator)

Farsi language into English and certify that the translation of  
(language)

Documents required for "Passport Issuance / Renewal"  
(names of documents)

is true and accurate to the best of my abilities.

Nazanin Kiani  
(signature of translator)

Nazanin Kiani  
(typed/printed name of translator)

1 Park Plaza, Suite 600, Irvine, CA 92612  
(address of translator)

(address of translator)

949-285-1836  
(telephone number of translator)

Office for the Protection of the Interests of the Islamic Republic of Iran – Washington, DC  
Embassy of Pakistan- (interest section of the Islamic Republic of Iran)

Date: 12/15/2025

## **Passport**

### **Pass Card – Passport**

#### **Passport issuance/renewal**

##### **Documents required for passport issuance/renewal:**

- **Printed Receipt of “Passport Issuance” received from MIKHAK Portal (check expiration as the reason for the request)**
- **Form number 001**
- **Original birth certificate \***
- **Original or photocopy of National ID card\***
- **Original or photocopy of valid residence documents**
- **Original or photocopy of end of Military service/exemption card (for male between 18 to 50 years old )**
- **? recent photographs (according the photo guide)**
- **Money order for application fee according to the list of consular service fee from 600)**
- **Changing the place of residence in the passport (to the US/Canada) is only possible upon direct request from the applicant and meeting the conditions.**
- **If a change of residence is requested, the cost must be added to the issuance fee.**
- **If your passport indicates your place of residence as the "Islamic Republic of Iran," you must visit your local city passport office to obtain the necessary authorization to leave Iran before your departure.**
- **Indicating a place of residence abroad in the passport serves as authorization to leave the country repeatedly (except for eligible individuals).**
- **According to Iranian civil law, the place of residence (listed in the passport) of a wife/children under 18 years of age is subject to the place of residence (listed in the passport) of the husband/father. If there is a need to change the place of residence in the passport (to the US/Canada), a written request from the husband/father is required.**
- **If your ID card does not include a photograph and you are over the age of fifteen, you must apply for a replacement ID card at the same time you submit your passport renewal application by using Form 423.**

**\* If the original ID card/national card is in Iran, your relatives can take it to the Ministry of Foreign Affairs and request that a copy of the original be sent to this mission.**

12/15/25, 8:58 AM

دفتر حفاظت منافع جمهوری اسلامی ایران - واشنگتن دی سی



دفتر حفاظت منافع جمهوری اسلامی ایران - واشنگتن دی سی  
Embassy of Pakistan - Interests section of the Islamic Republic of Iran



۱۴۰۴ آذر ۲۴

## گذرنامه

برگ عبور

گذرنامه

### صدور / تجدید گذرنامه

#### مدارک لازم جهت صدور/تجدید گذرنامه:

- چاپ رسید درخواست "صدور گذرنامه" دریافتی از سامانه میخک (علت درخواست را "خاتمه اعتبار" انتخاب کنید)
- فرم شماره ۱۰۰
- اصل گذرنامه
- اصل شناسنامه\*
- اصل یا تصویر کارت ملی\*
- اصل یا تصویر مدارک اقامتی معتبر
- اصل یا تصویر کارت پایان خدمت/معافیت (جهت آقایان بین ۱۸ تا ۵۰ سال)
- تعداد ؟ قطعه عکس جدید (مطابق راهنمای عکس)
- هزینه خدمات بصورت Money Order طبق فهرست هزینه های خدمات کنسولی ۶۰۰

- تغییر محل اقامت در گذرنامه (به آمریکا/کانادا)، تنها با تقاضای مستقیم متقاضی و داشتن شرایط آن امکان پذیر است.
- در صورت درخواست تغییر محل اقامت، هزینه آن بایستی به هزینه صدور اضافه گردد.
- در صورتی که محل اقامت در گذرنامه صادره از این نمایندگی، جمهوری اسلامی ایران ثبت شده باشد، بایستی در اولین ورود به کشور با مراجعه به اداره گذرنامه شهر محل سکونت خود، نسبت به دریافت اجازه خروج از کشور اقدام نمایید.



12/15/25, 8:58 AM

دفتر حفاظت منافع جمهوری اسلامی ایران - واشنگتن دی سی

- درج محل اقامت خارج از کشور در گذرنامه، به منزله اجازه خروج مکرر از کشور می باشد (به غیر از افراد مشمول).
- طبق قانون مدنی ایران، محل اقامت (مندرج در گذرنامه) زن/فرزندان زیر ۱۸ سال تابع محل اقامت (مندرج در گذرنامه) شوهر/پدر می باشد. در صورت نیاز به تغییر محل اقامت در گذرنامه (به آمریکا/کانادا)، نیاز به تقاضای کتبی شوهر/پدر می باشد.
- در صورتی که شناسنامه شما عکس دار نمی باشد و بالای سن پانزده سال تمام هستید، می بایست با رجوع به فرم ۴۲۳ نسبت به تعویض همزمان شناسنامه با درخواست تجدید گذرنامه خود اقدام کنید.

\* اگر اصل شناسنامه/کارت ملی در ایران است، بستگان شما می توانند آن را به وزارت امور خارجه برده و تقاضای ارسال تصویر برابر با اصل آن را به این نمایندگی بنمایند.



Office for the Protection of the Interests of the Islamic Republic of Iran - Washington, DC  
Embassy of Pakistan - Interests section of the Islamic Republic of Iran



December 14, 1404

# Passport

Pass card

Passport

## Passport issuance/renewal

### Documents required for passport issuance/renewal:

- the Print receipt of "Passport Issuance" request received from
- "Validity Expiry" as the reason for the ( select Mikhak system request)
- Form No. 001
- Original passport
- Original birth certificate\*
- Original or photocopy of national ID card\*
- Original or photocopy of valid residence documents
- Original or photocopy of end of service/exemption card (for men between 18 and 60 years old)
- the photo guide Number of new photos (according to the list of according to Money Order Service fee in the form of 500 consular service fees
- Changing the place of residence in the passport (to the US/Canada) is only possible upon direct request from the applicant and meeting the conditions.
- If a change of residence is requested, the cost must be added to the issuance fee.



12/15/25, 8:56 AM

Office for the Protection of the Interests of the Islamic Republic of Iran – Washington, DC

**If your place of residence in the passport issued by this •**  
 the Islamic Republic of Iran , you embassy is registered as  
 must apply to the passport office in your city of residence upon  
 your first entry into the country to obtain permission to leave  
 the country.

**Indicating a place of residence abroad in the passport •**  
 constitutes permission to leave the country repeatedly (except  
 for eligible individuals).

**According to Iranian civil law, the place of residence (listed in •**  
 the passport) of a wife/children under 18 years of age is subject  
 to the place of residence (listed in the passport) of the  
 husband/father. If there is a need to change the place of  
 residence in the passport (to the US/Canada), a written request  
 from the husband/father is required.

**If your ID card does not have a photo and you are over the age •**  
 of fifteen, you must apply for a replacement of your ID card at  
 the same time as your passport renewal application by  
Form ۴۲۳ referring to

**\* If the original ID card/national card is in Iran, your relatives can**  
 take it to the Ministry of Foreign Affairs and request that a copy of  
 the original be sent to this mission.

### **Passport separation**

#### **Documents required for passport separation:**

**thePrint the receipt for the "Passport" application received from •**  
 "Validity Expiry" ( select the reason for the request as Mihk system  
 )

Form No. ۰۰۱ •

The original passport with which you left Iran. •

Original birth certificate\* •

# EXHIBIT E

Department of Homeland Security  
U.S. Immigration and Customs Enforcement  
Form:

Continuation Page for

I-220B

Alien's Name  
MAJD, Kazem

File Number

Date

10/26/2004

Alien's Signature

Alien's Address

KAZEM MAJD

Alien's Telephone Number (if any)

Address updated w/ DMV on 1/05. upe

RIGHT INDEX PRINT

PERSONAL REPORT RECORD

| DATE     | OFFICER | COMMENT/CHANGES                                                                                         |
|----------|---------|---------------------------------------------------------------------------------------------------------|
| 10/26/04 | D 06    | SUBJECT RELEASED 10/26/04. TO REPORT TO LOS/DRO ON 11/2/04.                                             |
| 11/2/04  | 424     | 2/2/05 AS                                                                                               |
| 2/4/05   | 404     | SUBJ. RESIDES MARY WINDO 3/4/05 June                                                                    |
| 3/4/05   | upe     | RIP/NC Subj. enrolled in MSR. Call once per month. Report in person on 6/15/05.                         |
| 6/20/05  | upe     | RIP/NC continue calling monthly. Report next on 9/20/05.                                                |
| 9/22/05  | upe     | RIP/NC Continue calling monthly, including month of September. Next report date 3/22/06.                |
| 12/10/05 | upe     | Subj. reported per #56 to fill out TD Request Birth Cert App, & O/S Addendum. Next report date 3/22/06. |
| 3/22/06  | upe     | RIP/NC Continue calling monthly. Report next - 9/25/06.                                                 |
| 10/2/06  | LCB     | RIP/NC continue calling monthly - Report 1/3/07                                                         |
| 1/5/07   | LCB     | RIP/NC continue calling monthly - Report 4/2/07                                                         |
| 4/6/07   | GC      | RIP/NC Next RPT 5/7/07                                                                                  |
| 5/7/07   | GC      | RIP/NC Cont. Calling Monthly Next RPT 8/8/07                                                            |
| 8/8/07   | GC      | RIP/NC " " " " Next RPT Date 11/8/07                                                                    |
| 11/8/07  | GC      | Next RPT Date 04/08/12                                                                                  |

Signature

Title

DEPORTATION OFFICER

# Order of Supervision

MAJD, kazem

## Personal Report Record

| Date        | Officer |                                          | Next Date    |
|-------------|---------|------------------------------------------|--------------|
| 11/8/07     | LB      | RIP/RC Continue Calling Monthly - Report | 2/8/08       |
| 2/8/08      | GL      | RIP/RC - 11 - Next Report →              | 5/8/08       |
| 5-7-08      | DK      | RIP MXT RIP →                            | 8-4-08       |
| 8-4-08      | DK      | RIP MXT RIP →                            | 11-4-08      |
| 11-4-08     | TD      | RIP, Return                              | 2-4-09       |
| 2-4-09      | DL      | RIP - RTN →                              | 5-7-09       |
| 5/2/09      | HC      | RIP RTN                                  | 8/2/09       |
| 8-7-9       | DL      | RIP RTN                                  | 11-2-9       |
| 11-2-9      | DK      | RIP RTN                                  | 3-2-10       |
| 3/1/10      | MT      | RIP RTN                                  | 6/1/10       |
| 6/2/10      | MT      | RIP RTN                                  | 9/2/10       |
| 9-2-10      | MT      | RIP RTN                                  | 12-2-10      |
| 12/2/10     | LT      | RIP RTN kato                             | 3/2/11       |
| 3/4/11      | MT      | RIP RTN                                  | 6/8/11       |
| 06/09/11    | AL      | RIP RTN                                  | 07/11/2011   |
| 7/8/11      | H       | RIP RTN                                  | 10/12/10/11  |
| 10/6/11     | H       | RP RTN                                   | 1/9/12       |
| 01/09/12    | L       | RIP RTN                                  | 04/09/12     |
| 4/9/12      | S.C.    | RIP RTN                                  | 10/10/12     |
| 10/10/12    | S.C.    | RIP RTN                                  | OCT 10 2013  |
| 6/6/13      | WJ      | RIP RTN                                  | DEC 09 2013  |
| 12/9/13     | JH      | RIP RTN                                  | MAY 09 2014  |
| 5/9/14      | S.C.    | RIP RTN                                  | NOV 10, 2014 |
| 11/10/14    | S.C.    | RIP RTN                                  | NOV 10, 2015 |
| 11-10-15    | TD      | RIP RTN                                  | NOV 10, 2016 |
| 11/10/16    | ML      | RIP RTN                                  | NOV 6, 2017  |
| 11/05/17    | ML      | RIP RTN                                  | Nov 6, 2018  |
| 11/6/18     | L       | RIP RTN                                  | 11/6/19      |
| 11/6/19     | ML      | RIP RTN                                  | 11/05/20     |
| NOV 02 2021 | ML      | Return                                   | NOV 02 2022  |
| NOV 06 2022 | ML      | Return                                   | NOV 07 2024  |

# EXHIBIT F

December 15, 2025

Department of Homeland Security  
Immigration and Customs Enforcement

**RE: Letter of Support for Kazem Majd (A )**

My name is Carolyn Majd, I am 74 years of age, a US-born citizen, and was married to Kazem Majd in 1973. Although divorced in 1992, we have remained lifelong partners and have continued to live together for 50+ years. I am writing respectfully to request that my husband not be detained due to the extreme hardship I would suffer.

I am an only child and do not have siblings. His detention would cause me irreparable emotional, financial and psychological harm. Due to several joint replacement and spinal fusion surgeries, the most recent in July, 2024, my mobility has been greatly diminished and I must rely on a walker or cane to get around. Walking any distance is difficult for me, and I also have a history of falls at home. I rely on him solely as I also have no friends to help me out and no one to pick me up if I fall.

My driving is limited as well, due to a serious auto accident in October, 2023, in which the car was totaled. I depend on him to take me to any doctor or other appointment which requires freeway driving.

I also suffer from Ulcerative Colitis and have been hospitalized numerous times due to intestinal blockages which render me weak and unable to care for myself. In February, 2024, I was hospitalized three times and finally had surgery to clear scar tissue in my colon. Stress and anxiety greatly contribute to my intestinal difficulties and as of this writing I am suffering from a colitis flare due to the shock of his being detained on December 11, 2024. He had just the week before been fitted for an ankle monitor followed by a smartphone monitor, so his detention was a cruel blow.

I am asking for your compassion and understanding. I respectfully request that you consider the extreme hardship I would be forced to endure if Kazem were not allowed to remain on release with annual check-in. He has a long history of reporting to you annually and on time, 23 years to be exact.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. I would be happy to answer any questions or provide any paperwork you require.

*Carolyn Majd*

Carolyn D. Majd



# EXHIBIT G

I, Olia Majd, submit this declaration in support of my father, Kazem Majd, who is currently detained by Immigration and Customs Enforcement (ICE).

I am my father's daughter and a United States citizen. I am gravely concerned that my father's continued detention places his health and life at serious risk.

My father is 77 years old and has lived in the United States for close to 60 years. He has complied fully with ICE supervision for over 23 years, reporting annually without fail and posing no risk to public safety.

He suffers from a **rare, progressive medical disease**, along with other chronic conditions, that requires daily medications, frequent medical imaging such as MRIs, and close medical oversight. His physicians have documented that **without uninterrupted treatment and proper monitoring, his condition can result in severe complications, including death.**

Before his detention, I was closely involved in managing my father's medical care, including communicating with his doctors, coordinating appointments, and ensuring he took his medications as prescribed. Continuity of care is critical to managing his condition safely.

Given his age and medical fragility, detention itself poses significant risk even with evaluation, as interruptions in care or inadequate oversight can cause rapid deterioration.

My father is also the primary source of physical and financial support for his partner, a United States citizen who is handicapped and relies on him for daily assistance. His detention has placed those responsibilities onto me, creating significant hardship and further destabilizing our family. This additional strain underscores the unnecessary and harmful consequences of his continued detention.

My father is elderly, medically vulnerable, and has demonstrated extraordinary compliance with government supervision for more than two decades. Continued detention serves no legitimate purpose and instead places him at risk of irreversible harm.

I respectfully request that the Court consider his release under appropriate supervision so that he may receive consistent and appropriate medical care outside of detention.

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

Respectfully,

*Olia Majd*

Olia Majd  
Daughter of Kazem Majd  
12/14/2025