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7 Attorney for Petitioner

8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**

10 **SUREN MANOUKYAN** 

Case No.: '26CV0721 BJC DDL



11 **Petitioner,**

12 **v.**

13 **Warden, Imperial Regional Detention**
14 **Facility, KRISTI NOEM, Secretary,**
15 **U.S. Department of Homeland**
16 **Security, TODD LYONS, Acting**
17 **Director, Immigration and Customs**
18 **Enforcement, FIELD OFFICE**
19 **DIRECTOR, ICE Enforcement and**
20 **Removal Operations, Los Angeles, and**
21 **DOES 1-10, in their official capacities,**

22 **Respondents.**

PETITION FOR WRIT OF
HABEAS CORPUS (28 U.S.C. §
2241), AND DECLARATORY AND
INJUNCTIVE RELIEF

23
24 **PETITION FOR WRIT OF HABEAS CORPUS**

25 **INTRODUCTION**

1 Petitioner Suren Manoukyan (“Petitioner”) respectfully petitions this Court
2 for a writ of habeas corpus pursuant to 28 U.S.C. § 2241 challenging his continued
3 civil immigration detention by the Department of Homeland Security (“DHS”) and
4 Immigration and Customs Enforcement (“ICE”) at the Imperial Regional Detention
5 Facility, in Calexico, California.
6

7
8 Petitioner arrived at the United States with a visa. On or about August 1,
9 2000, Petitioner was granted asylee status in the United States pursuant to INA
10 §208. On or about February 12, 2002, Petitioner applied to adjust his status from
11 an asylee to a lawful permanent resident. On or about June 12, 2006, this
12 application to adjust status was denied. As a result of this denial Petitioner was still
13 admitted to the United States as an asylee. On or about June 29, 2009, Petitioner
14 was convicted of a crime in the Superior Court of California, County of Los
15 Angeles. After serving his term of imprisonment, Petitioner was detained in ICE
16 detention for several months in 2011. In June 2011, ICE released Petitioner from
17 ICE custody pending removal from the United States. Petitioner served his
18 sentence and has thus abided by all requirements of his parole and immigration
19 expectations thereafter.
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21
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23

24 Despite full compliance with all ICE reporting requirements and parole
25 requirements, Petitioner was re-detained on January 2026, at a routine ICE check-
26 in, without any meaningful individualized custody determination. Petitioner is not
27
28

1 a flight risk or a danger to the community. Prior to his detention, he was reporting
2 with the U.S. Immigration and Customs Enforcement (USICE) and had not missed
3 an appointment or check-in.
4

5 Petitioner seeks either immediate release under reasonable conditions of
6 supervision, or in the alternative, release under supervision.
7

8 **CUSTODY**

9 1. Petitioner is in the physical custody of Respondent DAVID MARIN,
10 Field Office Director for Detention and Removal, U.S. Immigration and Customs
11 Enforcement (USICE), the Department of Homeland Security (DHS), and
12 Respondent Warden of the Imperial Regional Detention Facility in Calexico,
13 California. At the time of the filing of this petition, Petitioner is detained at the
14 Imperial Regional Detention Facility in Calexico, California. The Imperial
15 Regional Detention Facility contracts with the DHS to detain aliens such as
16 Petitioner. Mr. Manoukyan is under the direct control of Respondents and their
17 agents.
18
19
20

21 **JURISDICTION AND VENUE**

22 2. This Court has jurisdiction under 28 U.S.C. § 2241 because Petitioner is
23 in Federal custody within the territorial jurisdiction of this District. Petitioner is
24 currently detained at Imperial Regional Detention Facility, located in Imperial
25 County, California, within the Southern District of California.
26
27
28

1 3. Petitioner is in federal custody within the Southern District of California
2 and challenges the legality of that custody under the Fifth Amendment to the
3 United States Constitution and the laws of the United States. This Court also has
4 jurisdiction under 28 U.S.C. § 1331 and the Suspension Clause, U.S. Const. art. I,
5 § 9, cl. 2, which preserves the right to seek habeas corpus relief. The Court has
6 authority to grant relief pursuant to 28 U.S.C. § 2241 and, where appropriate, the
7 All Writs Act, 28 U.S.C. § 1651. Venue is proper in this District because Petitioner
8 is detained at the Imperial Regional Detention Facility, and Petitioner's immediate
9 custodian is located within this District.
10

11
12
13 4. Venue is proper in this Court pursuant to 28 U.S.C. § 2241(a) and
14 §1391(e), because Mr. Manoukian currently resides in this district and Petitioner's
15 immediate custodian is located in this District and officers or agencies of the
16 United States.
17

18 5. This Court has jurisdiction under 28 U.S.C. § 1331 because this action
19 arises under the Constitution, the Immigration and Nationality Act (INA), and
20 federal common law. Mr. Manoukian's habeas claims fall squarely within 28
21 U.S.C. § 2241 because they challenge only (the legality and duration of his
22 detention. Such claims do not seek direct review of a removal order, nor do they
23 challenge a discretionary decision to commence, adjudicate, or execute removal
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1 proceedings. They are therefore cognizable under § 2241 and fall outside the
2 jurisdictional limits imposed by 8 U.S.C. § 1252.

3
4 6. Mr. Manoukyan further invokes jurisdiction under the 5 U.S.C. §§ 701-
5 706, because he challenges agency action unlawfully withheld or unreasonably
6 delayed.

7
8 7. The United States has waived sovereign immunity under 5 U.S.C. § 702.

9
10 **PARTIES**

11
12 8. Mr. Suren Manoukyan is a 42-year-old man born in Armenia who
13 entered the United States over two (2) decades ago with a Visa.

14
15 9. Respondent [Name Unknown], Warden of the Imperial Regional
16 Detention Facility in Calexico, California, is the immediate custodian of Petitioner
17 and is sued in his/her official capacity. The Warden has day-to-day responsibility
18 for Petitioner's detention and is therefore a proper respondent in this habeas corpus
19 action.

20
21 10. Respondent Secretary of the Department of Homeland Security is sued
22 in her official capacity and has legal authority over immigration detention and
23 enforcement. She is responsible for the administration of the immigration laws
24 pursuant to 8 U.S.C. § 1103, and the Executive Office for Immigration Review
25

1 (EOIR which houses the immigration courts and the Board. She is sued in her
2 official capacity.

3
4 11. Respondent KRISTI NOEM is the Secretary of the U.S. DHS and is sued
5 In official capacity. DHS has ultimate authority over immigration enforcement and
6 the execution removal orders.

7
8 12. Respondent RODNEY S. SCOTT is the Commissioner of U.S. Customs
9 Border Protection and is sued in his official capacity.

10 13. Respondent Secretary of the Department of Homeland Security is sued in
11 her official capacity and has legal authority over immigration detention and
12 enforcement. ICE is the DHS detention and removal.

13
14 14. Respondent ICE Field Office Director, Los Angeles Field Office is sued
15 in his official capacity and has authority over Petitioner's detention and custody
16 determinations. He has authority over the detention and removal of the Plaintiffs.

17
18 15. Respondent Facility Director, Imperial Regional Detention Facility
19 is Petitioner's immediate custodian and is sued in his official capacity.

20
21 16. Respondent DAVID NEAL is the Director of the EOIR and is sued in his
22 Official capacity. EOIR oversees the immigration courts and the BIA. Among
23 other duties, he has the authority to "[d]irect the conduct of all EOIR employees to
24 ensure the efficient disposition of all pending cases, including the power, in his
25 discretion, to set priorities or time frames for the resolution of cases; to direct that
26
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1 the adjudication of certain cases be deferred; to regulate the assignment of
2 adjudicators to cases; and otherwise to manage the docket of matters to be decided
3 by the Board, the immigration judge, the Chief Administrative Hearing Officer, or
4 the administrative law judges." 8 C.F.R. § 1003.0(b)(1)(ii). Mr. Neal is empowered
5 to instruct the Board to rule on an immigration motion. *Id.* He is sued in his official
6 capacity.
7

8
9 17. Respondents JOHN DOES 1-10 are unknown DHS/ICE/EOIR officials
10 responsible for effectuating Ms. Paris' removal and/or implementing the challenged
11 decisions.
12

13 **FACTUAL BACKGROUND**

14 18. Mr. Suren Manoukyan is a 42-year-old man born in Yerevan, Armenia
15 who entered the United States in over two (2) decades ago based with a visa.
16

17 19. On or about August 1, 2000, Petitioner was granted asylee status in the
18 United States pursuant to INA §208. On or about February 12, 2002, Petitioner
19 applied to adjust his status from an asylee to a lawful permanent resident.
20

21 20. On or about June 12, 2006, this application to adjust status was denied.
22 As a result of this denial Petitioner was still admitted to the United States as an
23 asylee. **(See Exhibit B)**
24

25 21. On or about June 29, 2009, Petitioner was convicted in the Superior
26
27
28

1 Court of California, County of Los Angeles, of the offense of Conspiracy to
2 Commit Kidnapping, in violation of California Penal Code § 182(a)(1)/207(a).

3
4 For this offense Petitioner was sentenced to a term of imprisonment of 8 years.

5 Petitioner served his sentence and has thus abided by all requirements of his parole
6 and immigration expectations thereafter.

7
8 *Initial Detention*

9 22. In 2011, immediately after serving his term of imprisonment, Petitioner
10 was detained by U.S. Immigration and Customs Enforcement (“ICE”) for several
11 months at Imperial Regional Detention Facility (also known as El Centro).
12

13 23. On March 21, 2011, the immigration judge ordered REMOVAL.

14 *Community Release*

15 24. In June 2011, ICE released Petitioner from ICE custody pending removal
16 from the United States. **(See Exhibit C)** Thereafter, Petitioner fully complied with
17 all ICE reporting and supervision requirements, including attending all scheduled
18 check-ins and adhering to all conditions of release.
19
20

21 *Re-Detention by ICE*

22 25. Despite full compliance with all ICE reporting requirements and parole
23 requirements, Petitioner was re-detained on January 2026, at a routine ICE check-
24 in, without any meaningful individualized custody determination. Petitioner is not
25 a flight risk or a danger to the community. Prior to his detention, he was reporting
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1 with the U.S. Immigration and Customs Enforcement (USICE) and had not missed
2 an appointment or check-in.

3
4 26. Petitioner reported regularly to ICE/Parole for over fifteen years without
5 violation.

6
7 27. Following his re-detention, Petitioner submitted an Emergency Parole
8 Request to ICE seeking release based on humanitarian and legal grounds. ICE has
9 not responded to this request as of the date of this filing.

10 *Family Hardship, Primary Provider Role, and Community Ties*
11

12 28. Prior to his re-detention, Petitioner resided in the community with his US
13 Citizen wife and two (2) minor children. **(See Exhibit D)** Both children were born
14 in the United States. Petitioner has remained the primary financial provider and
15 caregiver for his family, responsible for household expenses, rent, utilities, food,
16 transportation.

17
18 29. Petitioner's sudden and unanticipated re-detention has imposed severe
19 and immediate hardship on his family, including the loss of their principal source
20 of financial support, disruption of childcare and family stability.

21
22 30. Petitioner is a licensed truck driver and holds a Class-A driver License.
23 **(See Exhibit D)** Petitioner has long held a job and has supported his family and the
24 been a vital worker for the American people. During the Covid-19 pandemic,
25 Petitioner continued to work and deliver necessary goods.
26
27

1 31. Petitioner has established substantial community ties, including stable
2 residence, consistent ICE reporting, family unity, and compliance with all
3 conditions of release for more than **fifteen (15) years**. These equities further
4 demonstrate that Petitioner **does not present a flight risk or a danger to the**
5 **community** and is an appropriate candidate for release under reasonable
6 conditions of supervision.
7

9 32. Petitioner is heavily involved in his local church and stands as God father
10 to his nieces and nephews. **(See Exhibit E)**
11

12 33. The hardship to Petitioner's family and the disruption of their concurrent
13 immigration proceedings constitute **ongoing, irreparable harm** that cannot be
14 remedied by later relief and must be weighed in any **constitutionally adequate,**
15 **individualized custody determination.**
16

17 *Lack of Legitimate Immigration Purpose for Detention*

18 34. Petitioner's continued detention serves no legitimate immigration
19 purpose. Petitioner has resided in the United States for over two decades and has
20 substantial ties to this country. The underlying criminal conduct dates back to
21 approximately 2006, with a formal conviction occurring around 2009. Petitioner
22 fully served the sentence imposed, including custody time served prior to
23 conviction. After completing that sentence, Petitioner was initially held in
24 immigration detention for several months but was subsequently released and lived
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1 in the community for approximately fifteen (15) years without incident or
2 additional criminal conduct, as reflected in the criminal background search
3 attached hereto as **Exhibit F**. Despite this extended period and the Government's
4 longstanding awareness of Petitioner's immigration status, the Government has
5 been unable to effectuate his removal or secure a country willing to accept him.
6

7
8 35. Petitioner has now accumulated prolonged immigration detention that
9 exceeds the presumptively reasonable six-month period recognized in *Zadvydas v.*
10 *Davis*, 533 U.S. 678 (2001), and there is no significant likelihood of removal in the
11 reasonably foreseeable future. Continued detention under these circumstances no
12 longer serves any legitimate immigration purpose and instead constitutes punitive
13 civil detention in violation of the Fifth Amendment Due Process Clause. Absent
14 immediate judicial intervention, Petitioner faces ongoing and irreparable harm,
15 including potential removal before this Court can adjudicate the legality of his
16 detention, warranting urgent habeas relief and a stay of removal.
17
18

19
20 36. The facts set forth herein are supported by the Declaration of Counsel
21 (Exhibit A) and the documentary evidence attached as Exhibits B–H.
22

23 **CAUSES OF ACTION**

24 **COUNT I**

25 **Habeas Corpus**

26 **(Unlawful Prolonged Detention)**

(28 U.S.C. § 2241; Fifth Amendment; 8 U.S.C. § 1226; *Zadvydos v. Davis*)

37. Mr. Manoukyan incorporates each and every allegation contained in the paragraphs.

38. Petitioner is presently detained at the Imperial Regional Detention Facility.

A. Zadvydas Claim - Detention Under a Non-Executable Order

39. Under 8 U.S.C. § 1231(a), once a removal order becomes administratively final, the government is afforded a 90-day “removal period” to effectuate removal. However, the Supreme Court in *Zadvydas v. Davis*, 533 U.S. 678 (2001), held that post-removal-order immigration detention is constitutionally limited and may not continue indefinitely. The Court established that detention beyond six months is presumptively unreasonable where there is no significant likelihood of removal in the reasonably foreseeable future.

40. In 2011, immediately after serving his term of imprisonment, Petitioner was detained by U.S. Immigration and Customs Enforcement (“ICE”) for several months at Imperial Regional Detention Facility (also known as El Centro).

41. On March 21, 2011, the immigration judge ordered REMOVAL.

42. In June 2011, ICE released Petitioner from ICE custody pending removal from the United States.

43. ICE detained Petitioner all those months but was unable to remove him

1 due to his statelessness and Armenia's refusal to accept him.

2 44. Petitioner lived in the Community for fifteen (15) years with a removal
3 order and ICE was unable to remove him.
4

5 45. Despite full compliance with all ICE reporting requirements and parole
6 requirements, Petitioner was re-detained on January 2026, at a routine ICE check-
7 in, without any meaningful individualized custody determination.
8

9 46. The cumulative period of custody now far exceeds the six-month
10 limit under *Zadvydas v. Davis*, 533 U.S. 678 (2001), and removal is not reasonably
11 foreseeable.
12

13 47. Detention under a non-executable removal order is arbitrary punitive in
14 effect, and violates due process.
15

16 48. Petitioner's detention has become prolonged and constitutionally
17 significant, triggering heightened due process protections, including the right to a
18 prompt, individualized custody hearing before a neutral decisionmaker.
19

20 49. At any such hearing, the government must bear the burden of proving by
21 Clear and convincing evidence that Petitioner poses a flight risk or a danger to the
22 community in order to justify continued detention. *See Singh v. Holder*, 638 F.3d
23 1196, 1203–04 (9th Cir. 2011).
24

25 50. ICE has re-detained Petitioner and continues to hold him without
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1 providing any release or relocation information and without considering
2 Petitioner's substantial family ties, compliance history, community support, or the
3 non-mandatory nature of the alleged criminal allegation.
4

5 51. He is presently detained at the Imperial Regional Detention Facility in
6 Calexico, California.
7

8 52. Mr. Manoukyan therefore seeks a writ of habeas corpus ordering his
9 Immediate release from immigration custody, or, in the alternative, requiring ICE
10 to provide constitutionally adequate custody review and prohibiting any transfer or
11 custodial action that interferes with his ability to obtain meaningful judicial review.
12

13 14 15 **COUNT II**

16 **Violation of Fifth Amendment Due Process — Arbitrary Deprivation of** 17 **Liberty** (*U.S. Const. amend. V*)

18 53. Mr. Manoukyan incorporates each and every allegation contained in the
19 paragraphs.
20

21 54. The Due Process Clause protects noncitizens physically present in the
22 United States from arbitrary civil detention and guarantees a meaningful
23 opportunity to be heard. *See Zadvydas v. Davis*, 533 U.S. 678, 690 (2001);
24 *Hernandez v. Sessions*, 872 F.3d 976, 990 (9th Cir. 2017); *Morrissey v.*
25
26
27
28

1 *Brewer*, 408 U.S. 471, 481 (1972); *Tokatly v. Ashtoft*, 371 F.3d 613, 622 (9th Cir.
2 2004).

3
4 55. In assessing the lawfulness of continued civil immigration detention, due
5 process requires consideration of individualized factors, including family unity,
6 financial hardship, community ties, compliance with supervision, and the non-
7 punitive nature of immigration custody. ICE's failure to consider these equities
8 renders Petitioner's detention arbitrary, excessive, and constitutionally infirm.
9

10 56. Petitioner has a protected liberty interest in freedom from unnecessary
11 and prolonged immigration detention, particularly where, as here, he has
12 demonstrated consistent compliance, family unity, community ties, and the
13 absence of any recent criminal conviction in past 15 years.
14

15 57. Mr. Manoukyan has a protected liberty interest in freedom from arbitrary
16 indefinite immigration detention. See *Mathews v. Eldridge*, 424 U.S. 319, 335
17 (1976); *Singh v. Holder*, 638 F.3d 1196, 1203-04 (9th Cir. 2011).
18

19 58. ICE failed to provide a neutral, individualized custody determination
20 upon re-detention.
21

22 59. Continued detention without procedural safeguards violates due process.
23

24 60. ICE's failure to provide a neutral, individualized custody determination
25 upon re-detention, and its continued detention without procedural safeguards,
26 constitutes an arbitrary and excessive deprivation of liberty.
27

COUNT III

All Writs Act — Preservation of Jurisdiction

(28 U.S.C. § 1651)

61. Mr. Manoukyan incorporates each and every allegation contained in the paragraphs.

62. This Court has authority under the All Writs Act to issue all orders necessary to preserve its jurisdiction over this habeas action and prevent custodial actions or transfers that would interfere with Petitioner's access to the Court or counsel.

63. The All Writs Act empowers federal courts to issue all writs necessary or appropriate in aid of their respective jurisdictions.

PRAYER FOR RELIEF

WHEREFORE, Petitioner respectfully requests that this Court:

1. Assume jurisdiction pursuant to 28 U.S.C. §§ 1331 and 2241;
2. Issue a writ of habeas corpus ordering Petitioner's immediate release from ICE custody; or, in the alternative,
3. Release under supervision;
4. Declare that Petitioner's continued detention without such a hearing violates the Due Process Clause of the Fifth Amendment;

- 1 5. Issue a temporary restraining order and/or preliminary injunction staying
- 2 Petitioner's removal from the United States pending final adjudication of
- 3 this Petition for Writ of Habeas Corpus;
- 4
- 5 6. Order that Respondents shall not transfer Petitioner from the Imperial
- 6 Regional Detention Facility, or otherwise alter his custodial status, without
- 7 prior notice to Petitioner's counsel and leave of this Court, so as to preserve
- 8 this Court's jurisdiction and Petitioner's access to counsel;
- 9
- 10 7. Enjoin Respondents from continuing to detain Petitioner absent compliance
- 11 with constitutional and statutory requirements;
- 12
- 13 8. Award costs and attorneys' fees as permitted by law; and
- 14
- 15 9. Grant such other and further relief as the Court deems just and proper.
- 16

17 Date: February 4, 2026

18 Respectfully submitted,

19
20
21 ss// Sarah R. Hacobian
22 Sarah R. Hacobian, Esq.
23 Attorney for Petitioner
24
25
26
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28

Exhibit A — Declaration of Counsel

DECLARATION OF SARAH R. HACOBIAN, ESQ.

I, Sarah R. Hacobian, Esq., declare as follows:

1. I am an attorney licensed to practice law in the State of California and am attorney of record, in this matter. I make this declaration based on my personal knowledge and review of records associated with this case.
2. I have communicated directly with Petitioner, Suren Manoukyan, and members of his family regarding his immigration history, detention, and current circumstances.
3. Petitioner informed me that he entered the United States over twenty years ago with a Visa.
4. I reviewed documentation indicating that, on or about June 10, 2011, ICE released Petitioner from custody.
5. I have reviewed correspondence and supporting materials reflecting that Petitioner, through counsel, submitted an Emergency Parole Request to ICE following his re-detention, and that, as of the date of this declaration, no written response has been received.
6. I am informed by Petitioner and his family that he resides with and supports his wife and two minor children, who are US Citizens, and that Petitioner has served as the primary financial provider for his household prior to his re-detention.

1 7. The facts stated in this declaration are based on my personal
2 communications, review of documents provided to me, and my professional
3 involvement as counsel of record in this matter.
4

5
6 I declare under penalty of perjury under the laws of the United States of America
7 that the foregoing is true and correct.
8

9
10 Executed on **February 4, 2026**, at **Glendale, California**.
11

12
13 ss// Sarah R. Hacobian
14 **Sarah R. Hacobian, Esq.**
15 Attorney for Petitioner
16
17
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Exhibit B — Notice of Intent to Terminate

 **COPY**

[Redacted]

(b)(6) (b)(7)(C)

Detained

Assistant Chief Counsel
Office of Chief Counsel
U.S. Department of Homeland Security
U.S. Immigration and Customs Enforcement
1115 N. Imperial Avenue
El Centro, California 92243

UNITED STATES DEPARTMENT OF JUSTICE
EXECUTIVE OFFICE FOR IMMIGRATION REVIEW
IMMIGRATION COURT
EL CENTRO, CALIFORNIA

In the Matter of:

SURAN MANOUKYAN

In removal proceedings

File No.



Immigration Judge STATON

Next Hearing: Master Calendar
Date: MARCH 7, 2011

DEPARTMENT OF HOMELAND SECURITY
I-261; LODGED CHARGE
AND NOTICE OF INTENT TO TERMINATE
ASYLUM STATUS

SCANNED

BOU FEB 24 2011 ELC

10312 20110224 10:01

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

Additional Charges of Inadmissibility/Deportability

In: ☒ Removal proceedings under Section 240 of the Immigration and Nationality Act
☐ Deportation proceedings commenced prior to April 1, 1997 under former Section 242 of the Immigration and Nationality Act

In the Matter of:

Alien/Respondent: Suran MANOUKYAN

File No:  Address: c/o ICE 1115 N. Imperial Ave., El Centro CA 92243

There is/are hereby lodged against you the following charge(s) either ☐ in addition to ☒ in lieu of the original charges that you are subject to being taken into custody and deported or removed from the United States pursuant to the following provision(s) of law:

Section 237(a)(2)(A)(iii) of the Immigration and Nationality Act of 1952, as amended, in that you were convicted of an aggravated felony at any time after admission, as defined in Section 101(a)(43)(F) of the Act, a crime of violence, as defined in Section 16 of Title 18 of the United States Code, for which the term of imprisonment was at least one year.

Section 237(a)(2)(A)(iii) of the Immigration and Nationality Act of 1952, as amended, in that you were convicted of an aggravated felony at any time after admission, as defined in Section 101(a)(43)(U) of the Act, an attempt or conspiracy to commit an offense described in Section 101(a)(43)(F) of the Act, a crime of violence as defined in Section 16 of Title 18 of the United States Code, for which the term of imprisonment was at least one year.

In Support of the additional charge(s) there is submitted the following factual allegation(s) ☐ in addition to ☒ in lieu of those set forth in the original charging document:

- A 1. You are not a citizen or national of the United States.
- A 2. You are a native and citizen of Armenia.
- A 3. On or about August 1, 2000, you were granted asylee status in the United States pursuant to INA §208.
- A 4. On or about February 12, 2002, you applied to adjust your status from an asylee to a lawful permanent resident.
- A 5. On or about June 12, 2006, this application to adjust status was denied.
- A 6. As a result of this denial you are still admitted to the United States as an asylee.
- A 7. On or about June 29, 2009, you were convicted in the Superior Court of California, County of Los Angeles, of the offense of Conspiracy to Commit Kidnapping, in violation of California Penal Code §182(a)(1)/207(a).
- A 8. For this offense you were sentenced to a term of imprisonment of 8 years.

U.S. Department of Homeland Security
P.O. Box 65015
Anaheim CA 92802-8515



U.S. Citizenship
and Immigration
Services

Suren MANUKYAN
c/o ICE
1115 N. Imperial Ave.
El Centro, CA 92243

Re: 

Dear Mr. Manukyan:

Notice of Intent to Terminate Asylum Status and Hearing before an Immigration Judge

The purpose of this letter is to notify you of the intent of U.S. Citizenship and Immigration Services (USCIS) to terminate the asylum status you were granted on **August 1, 2000**. This office has received the following information indicating that your asylum status could be terminated pursuant to 8 CFR 208.24(a)(3):

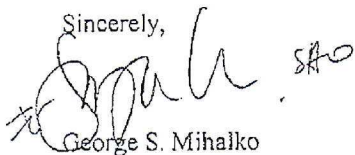
On July 28, 2009, in the Superior Court of California, County of Los Angeles, you were convicted of Conspiracy to Commit the Crime of Kidnapping in violation of California Penal Code 182(A)(1)-207(A). For that offense, the term of imprisonment imposed was eight years.

Therefore, you have been convicted of an aggravated felony as defined in Section 101(a)(43)(F) of the Immigration and Nationality Act. This conviction is a ground for denial of asylum under 8 CFR § 208.13(c)(2)(i)(D).

In order to give you the opportunity to respond to this adverse information, you will be scheduled for a hearing in front of an immigration judge on a date and at a location to be arranged.

You will have the opportunity at the hearing to present information and evidence to show that you are still eligible for asylum. Your asylum status will not be terminated unless a preponderance of the evidence supports termination. You may be represented at the hearing before the Immigration Court.

Sincerely,



George S. Mihalko
Director, Los Angeles Asylum Office

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing document was served on the parties listed below, on February 23, 2011.

PARTIES SERVED:

Suran Manoukyan
c/o ICE
1115 N. Imperial Ave.
El Centro CA 92243

- ☐ Fax
- ☐ Hand delivery
- ☒ Mailing
- ☐ Commercial courier

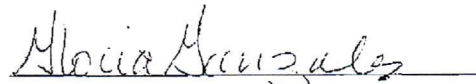

Gloria Gonzalez
Legal Assistant

Exhibit C —Release Documents

Subject ID



ORDER TO DETAIN OR RELEASE ALIEN

TO: (NAME and TITLE of Person in Charge of Facility)

JOHNNY N. WILLIAMS , ASSISTANT FIELD OFFICE DIRECTOR

(Name of Facility) EL CENTRO SPC
1115 NORTH IMPERIAL AVENUE
EL CENTRO, CA 92243

Please ☐ Detain ☒ Release

Date

Time

Name of Alien

Suren MANOUKYAN AKA: MANDUKYAN, SUREN

File Number

Event No.



Age

Date of Birth (Mo.Day.Yr.)

Sex

Nationality

Foreign Address

27



M

ARMENIA

Nature of Proceedings

Signature of Officer Receiving Alien

DEPORTATION OFFICER

REMARKS:

(b)(6) (b)(7)(C)

Signature of Officer Authorizing Action

(b)(6) (b)(7)(C)

Title

DEPORTATION OFFICER

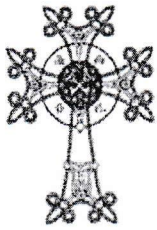
Office

SND/ECC

Form I-203 (Rev. 08/01/07)

UNITED STATES DEPARTMENT OF HOMELAND SECURITY

**Exhibit E — Church Support Letters/Photographs as Godfather in Church
Christening**



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ST. PETER ARMENIAN APOSTOLIC CHURCH

January 31 , 2026

To Whom It May Concern

I, the undersigned, hereby certify that Suren Manoukyan is a communicant member of St. Peter Armenian Church.

I've known Mr. Manukyan for over ten years.

Mr. Manoukyan attends Sunday Church service and he has always have shown willingness to serve, whenever we have events in the Church.

Mr. Manoukyan is a very honest, reliable, helpful and caring individual.

Sincerely,



Rev. Fr. Shnork Demirjian
Parish Priest

ST PETER ARMENIAN CHURCH
17231 Sherman Way
Van Nuys, CA 91406



Armenian Christians of Evangelical Faith Church
Արմենաքրիստոնէական Եւանգելիական Եկեղեցի

February 1, 2026

To Whom It May Concern,

On behalf of the Armenian Christians of Evangelical Faith Church in Glendale, California, this letter is to confirm that Suren Manukyan has attended our church on an occasional basis for many years.

During this time, he has participated in church donations and has demonstrated a kind and respectful character. He is well regarded within our church community.

Should you require any additional information, please do not hesitate to contact us.

Sincerely,

Arsen Zakaryan

Pastor – Arsen Zakaryan
Armenian Christians of Evangelical Faith Church

Exhibit F — Proof No Charges Filed

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES	
COURTHOUSE ADDRESS: GLENDALE COURTHOUSE - 600 EAST BROADWAY, GLENDALE, CA 91206	
NAME SEARCHED: MANOUKYAN, SUREN	CERTIFICATE OF CLERK RE: NAME SEARCH RESULTS
DATE OF BIRTH: 	

I, DAVID W. SLAYTON, Executive Officer/Clerk of Court of the Superior Court of California, County of Los Angeles, do hereby certify that I am the Custodian of Records of the Superior Court of California, County of Los Angeles, and that I have conducted a thorough search of all Court records, excluding those that are sealed pursuant to California Rules of Court, Rule 2.550, or are confidential by law,

from 01-01-1979 to 1/30/26 for the above-referenced name, and that:
(YEAR / DATE) (YEAR / DATE)

- ☐ I am unable to provide you with a copy of the case information/case number. The case information requested has been purged and/or destroyed pursuant to Court order. (G.C. 68152)
- ☒ My search has disclosed "NO CASE FILE" for the aforementioned name.
- ☐ My search has disclosed that the following case(s) was (were) filed involving the above-referenced name:

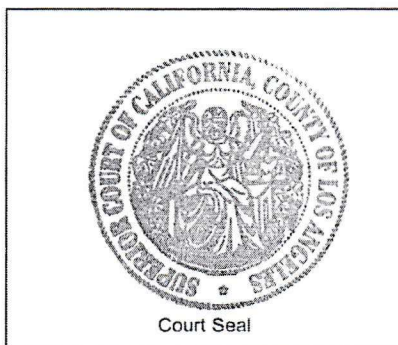
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

DATE: 1/30/26

DAVID W. SLAYTON, Executive Officer/Clerk of Court

By: B Hassan

Deputy Clerk



CERTIFICATE OF CLERK – NAME SEARCH RESULTS

Exhibit G — Additional Support Letters

To Whom It May Concern,

I, Shushanna Aperyán [REDACTED], respectfully submit this statement in support of my four children's Godfather Suren Manoukyan.

Following the death of my husband, he provided unwavering support to our family during an exceptionally difficult period and subsequently became the Godfather to my four children. He has consistently demonstrated integrity, compassion, and a strong commitment to family values.

His conduct and character reflect that he is a responsible, honorable, and caring individual. My children share a close and loving bond with him, and he has remained a stable, positive, and influential presence in their lives. His absence due to his detention by immigration authorities has been exceptionally difficult for my children.

I respectfully request that the Court consider this information in evaluating his case. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.



Respectfully,
Shushanna Aperyán

[REDACTED]

01/30/2026

[REDACTED]

Valley Village, CA, 91607
United States

To Whom It May Concern,

We, Jaklin Sefyan [REDACTED] and Heros Takhmazyan [REDACTED] are neighbors of Suren Manoukyan. We have known Mr. Manoukyan during his time in the community and can state that he is a respectful, kind, and responsible individual.

Mr. Manoukyan has consistently conducted himself in a positive and considerate manner. He has always been respectful toward our neighbors and has never caused any issues or disturbances within the community. He is a person of good moral character who treats others with courtesy, honesty, and integrity.

Based on our personal knowledge and experience, we believe Mr. Manoukyan to be a trustworthy and upstanding individual.

Should additional information be required, we may be contacted at [REDACTED]

Sincerely,

Jaklin Sefyan & Heros Takhmazyan

[REDACTED]
Glendale, CA 91206

To Whom It May Concern,

I, Jorjik Nazariyan, hereby state that I am the property owner for [REDACTED] Glendale, California, 91206. Suren Manoukyan and Gohar Yesayan are currently renting [REDACTED] from me.

During the entirety of his tenancy at the above-mentioned address, Mr. Manoukyan and his family have demonstrated exemplary conduct as tenants. He has consistently paid his rent in full and on time, without delay or issue. He has always fully complied with all terms and conditions of the lease agreement and has always shown respect for the property at all times.

Mr. Manoukyan has maintained the rental unit in very good condition and has taken proper care of the premises. He has been responsible, orderly, and considerate, and there have been no complaints from neighbors or any issues related to his tenancy. All interactions with him have been professional, respectful, and cooperative.

Based on my personal experiences as his landlord, I can confidently state that Mr. Manoukyan is a reliable, trustworthy, and law-abiding individual. He has shown integrity and responsibility throughout his tenancy; I consider him to be a valued and dependable tenant. I provide this statement voluntarily and truthfully in support of Mr. Manoukyan, and I respectfully submit it for consideration by the appropriate authorities.

I can be reached by phone at [REDACTED] or by email at [REDACTED]

Sincerely,
Jorjik Nazariyan

To Whom It May Concern,

We, Stefan Ghazaryansingerdi and Violet Safiani are Suren Manoukyan's neighbors. Mr. Manoukyan is currently being detained by ICE. Based on our own interactions with him, we want to inform you that he is very respectful and kind. He always treats others with courtesy and has never caused any issues our community.

We know that Mr. Manoukyan is a person with great morals. We would like to respectfully submit this statement for your consideration. Should further information be required, can be reached by phone at Stefan Ghazaryansingerdi at [REDACTED] and Violet Safiani [REDACTED]

[REDACTED]
Sincerely, 02.01.2026
Stefan Ghazarvansingerdi

[REDACTED]
Glendale, CA 91206

[REDACTED]
Sincerely,
Violet Safiani

[REDACTED]
Glendale, CA 91206

PROOF OF SERVICE

I am over the age of eighteen and not a party to this action. My business address is
440 Western Ave. Suite 205 Glendale, CA 91201.

On February 5, 2026, I served the foregoing **PETITION FOR WRIT OF HABEAS CORPUS (28 U.S.C. § 2241), AND DECLARATORY AND INJUNCTIVE RELIEF** on the following by [CM/ECF electronic filing and/or U.S. Mail / Certified Mail / email]:

U.S. Attorney – Southern District of CA
880 Front Street
San Diego, CA 92101

Attorney General of the United States
U.S. Department of Justice
950 Pennsylvania Avenue, N.W.
Washington, D.C. 20530-0001

ICE Enforcement and Removal Operations (ERO)
San Diego Field Office
880 Front Street
San Diego, CA 92101

Facility Director
Imperial Regional Detention Facility
1572 Gateway Road
Calexico, CA 92231

Secretary, U.S. Department of Homeland Security
2707 Martin Luther King Jr. Ave SE
Washington, DC 20528

Warden, Imperial Regional Detention Facility
1572 Gateway Road
Calexico, CA 92231

Acting Director, U.S. Immigration and Customs Enforcement
500 12th Street SW
Washington, DC 20536

Field Office Director
ICE Enforcement and Removal Operations
San Diego Field Office
880 Front Street
San Diego, CA 92101

I declare under penalty of perjury under the laws of the United States of America
that the foregoing is true and correct.

Executed on February 5, 2026 at Glendale, CA.

/s/ Sarah Hacobian

Sarah Hacobian