

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION**

DAWIT ABRAHAM MEKONNEN

Case No: 1:26-CV-00122

Petitioner,

v.

**SUPERINTENDENT, St. Genevieve County Detention Center
FIELD OFFICE DIRECTOR, ICE Chicago Field Office
TODD LYONS, Acting Director, U.S. Immigration and Customs Enforcement
MARKWAYNE MULLIN, Secretary, U.S. Department of Homeland Security
TODD BLANCHE, Acting Attorney General of the United States**

Respondents.

**PETITION FOR WRIT OF HABEAS CORPUS
28 U.S.C. § 2241**

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I. INTRODUCTION

1. Petitioner Dawit Abraham Mekonnen is a 37-year-old husband and father held in a detention cell at St. Genevieve County Detention Center in Missouri. He is married to Feven Tekeste Matewos, a naturalized United States citizen. Together they have a daughter, N [REDACTED] [REDACTED] born [REDACTED] 2023, in Washington State, who is also a United States citizen. N [REDACTED] is two years old. She has no father at home. He has no criminal record. Not one arrest. Not one charge. Not one conviction.
2. He was pulled over for a routine traffic matter. He told the officer the truth about his immigration status. He has been in a detention cell ever since. The marriage that should have protected him was itself the source of the harm. His wife, the mother of his daughter and a United States citizen, subjected him to sustained abuse throughout the marriage. She hit him, controlled his money, and repeatedly threatened to report him to immigration and withdraw the I-130 petition she had filed for him if he did not comply with her demands. When the marriage ended, she followed through. She refused to continue his immigration case and left him without a path.
3. He has filed a pending VAWA I-360 self-petition under 8 U.S.C. § 1154(a)(1)(A)(iii). Under the Violence Against Women Act, Congress specifically exempted VAWA self-petitioners from the usual bars that prevent individuals who entered without inspection from obtaining lawful permanent residence inside the United States. He does not need to leave the country to obtain a green card.
4. On March 25, 2026, the Eighth Circuit decided *Herrera Avila v. Bondi*, No. 25-3248, holding that most EWI detainees apprehended in the interior are subject to mandatory detention without bond under 8 U.S.C. § 1225(b)(2). Petitioner acknowledges that decision. But *Avila* did not involve a VAWA self-petitioner. It did not address whether a detainee with a pending VAWA petition who can adjust status without leaving the United States is seeking admission in the same sense. It did not address the Due Process Clause. And it did not address the fundamental liberty interest of a United States citizen child in not being permanently separated from her father.

5. Because of his pending VAWA self-petition, his prior formal parole, and his U.S. citizen daughter, Mr. Mekonnen is constitutionally entitled to an individualized bond hearing. This Court should order one immediately.

II. PARTIES

6. Petitioner Dawit Abraham Mekonnen is a citizen of Eritrea, born [REDACTED] (A-Number: A [REDACTED]). He entered the United States in December 2018 and is currently detained at St. Genevieve County Detention Center, 5 Basler Drive, Ste. Genevieve, Missouri 63670. Prior to his arrest, he resided at [REDACTED].
7. Respondent Superintendent of St. Genevieve County Detention Center is the immediate custodian with physical control over Mr. Mekonnen and the proper named respondent for habeas corpus purposes. *Rumsfeld v. Padilla*, 542 U.S. 426 (2004).
8. Respondent Field Office Director, ICE Chicago Field Office (St.Louis), is the ICE official with operational authority over Mr. Mekonnen's detention.
9. Respondent Todd Lyons is the Acting Director of U.S. Immigration and Customs Enforcement.
10. Respondent Markwayne Mullin is the Secretary of the Department of Homeland Security.
11. Respondent Todd Blanche is the Attorney General of the United States.

Feven Tekeste Matewos, age 36 (born [REDACTED]), is the naturalized U.S. citizen (Certificate of Citizenship No. A [REDACTED]; A-Number [REDACTED]) who married Mr. Mekonnen on May 30, 2021, and who is the mother of his daughter N [REDACTED]. She is not a party to this proceeding but is referenced throughout as the abuser whose conduct gives rise to the VAWA self-petition.

III. JURISDICTION AND VENUE

12. This Court has jurisdiction under 28 U.S.C. § 2241, which authorizes federal courts to grant writs of habeas corpus to persons held in custody in violation of the Constitution or laws of the United States. The Court also has jurisdiction under 28 U.S.C. § 1331. The Suspension Clause of Article I, § 9, clause 2 independently guarantees the right to seek habeas review.
13. Venue is proper in this District under 28 U.S.C. § 2241(d) because Mr. Mekonnen is physically confined within this judicial district at St. Genevieve County Detention Center.

IV. STATEMENT OF FACTS

A. Arrival, Parole, and Asylum

14. Mr. Mekonnen entered the United States in December 2018 after fleeing persecution in Eritrea. Immigration authorities detained him for approximately seven months. He was then formally paroled into the United States under 8 U.S.C. § 1182(d)(5)(A). He filed for asylum. His asylum case was later administratively closed when he married a U.S. citizen, and a family-based petition appeared to offer a path to lawful status.

B. Marriage to U.S. Citizen; Birth of Naomi

15. Mr. Mekonnen married Feven Tekeste Matewos, a naturalized United States citizen, on May 30, 2021, in Issaquah, King County, Washington. The couple lived together from January 2021 through January 2024. Their daughter, N[REDACTED], was born [REDACTED] 2023, in Washington State. N[REDACTED] is a United States citizen by birth and holds U.S. Passport No. A[REDACTED]. She is two years old.

C. The Abuse: Physical, Financial, and Immigration-Based

16. The marriage was abusive. His wife became controlling, jealous, and physically violent. She hit him and threw objects at him. She monitored his phone, his movements, and his relationships. She seized control of his entire income, used his debit cards without permission, and made him financially unable to leave.

17. She weaponized his immigration status as her primary tool of control. She repeatedly threatened to report him to immigration authorities; to withdraw the I-130 petition she had filed on his behalf, and to fabricate domestic violence allegations against him if he did not comply with her demands. Mr. Mekonnen, who had fled persecution in Eritrea, lived in constant fear of deportation and suffered in silence.

18. She compounded the abuse with deliberate verbal cruelty. [REDACTED]
[REDACTED] After separation, she denied him all contact with N [REDACTED] and threatened that any effort to seek visitation would result in his deportation. Her text messages, submitted with the VAWA petition, document this abuse in her own words.

D. Administrative Closure Based on Pending I-130

19. On March 24, 2023, Ms. Matewos filed Form I-130, Petition for Alien Relative (Receipt No. [REDACTED]) on Mr. Mekonnen's behalf. His removal proceedings before the San Francisco Immigration Court were administratively closed on December 21, 2023, by Order of Immigration Judge Kyra Lilien, upon joint request, based specifically on the pendency of that I-130. When Mr. Mekonnen and Ms. Matewos separated in January 2024, she made clear she would not continue to support his immigration case. The I-130 that formed the basis for closure was abandoned by the abuser herself.

E. Retaining Counsel and the VAWA Self-Petition

20. Left with no viable path through the marriage-based petition, Mr. Mekonnen retained counsel, to file a VAWA self-petition. Under INA § 204(a)(1)(A)(iii), 8 U.S.C. § 1154(a)(1)(A)(iii), abused spouses of U.S. citizens may petition for immigration protection entirely independent of their abuser. Congress enacted this remedy so that an abuser cannot use the immigration system as a permanent weapon. Before counsel could file the petition, Mr. Mekonnen was arrested.

F. The Arrest and Detention

21. Mr. Mekonnen was stopped in connection with a routine traffic matter. When the officer asked about his immigration status, he answered truthfully. He was taken into ICE custody solely on that basis. He had no outstanding warrant. He has no criminal record of any kind: no arrests, no charges, and no convictions. He is currently detained at St. Genevieve County Detention Center. He is not a danger to the community. Even while denied all contact with Naomi, he continued sending money for her care through his sister because the child's mother refused to communicate with him.

G. The VAWA I-360 Self-Petition, Filed From Detention

22. After his arrest, his attorney filed Form I-360 under the Violence Against Women Act on his behalf. USCIS received the petition on May 12, 2026, and issued Receipt Notice No. [REDACTED] on May 14, 2026. Counsel requested expedited review given Mr. Mekonnen's detained status. The petition is supported by his sworn five-page declaration, the marriage certificate, the abusive spouse's Certificate of Citizenship, N [REDACTED] U.S. passport, the administrative closure order, and text messages documenting battery and extreme cruelty in the abusive spouse's own words. Every element of INA § 204(a)(1)(A)(iii) and 8 C.F.R. § 204.2(c) is satisfied.

25. Mr. Mekonnen has filed a VAWA self-petition pursuant to INA § 204(a)(1)(A)(iii), 8 U.S.C. § 1154(a)(1)(A)(iii), which is currently pending before USCIS. Congress created VAWA to provide abused spouses of United States citizens with an independent pathway to lawful status free from the control of their abusers. If the petition is approved, Mr. Mekonnen may pursue adjustment of status in the United States through USCIS without the need for consular processing abroad.

26. Accordingly, Mr. Mekonnen has a pending and potentially dispositive form of immigration relief that remains under active consideration by USCIS. Removing him before USCIS adjudicates his VAWA petition would undermine the purpose of VAWA and could

effectively deprive him of the opportunity to pursue the relief Congress specifically made available to abused spouses of United States citizens.

H. N [REDACTED] A U.S. Citizen Child Facing Permanent Separation from Her Father

23. N [REDACTED] was born [REDACTED] 2023, in Washington State. She is a United States citizen, age two, holding U.S. Passport No. A [REDACTED]. She has spent much of her short life without her father.

24. Before his arrest, N [REDACTED] mother cut Mr. Mekonnen off entirely from his daughter, refusing all contact and threatening deportation if he sought legal remedies. He is now detained in Missouri. N [REDACTED] is in Washington State. The separation is not merely geographic.

27. The custodial parent has already severed all contact. While Mr. Mekonnen is detained in Missouri, he cannot initiate family court proceedings in Washington State. He cannot serve pleadings, appear at hearings, or enforce any visitation right. His abuser, who used his immigration status as a weapon throughout the marriage, is now using his detention to complete what she began: the permanent severance of his relationship with his daughter. Without relief from this Court, that separation will become permanent. N [REDACTED] cannot petition for her father's immigration status until she turns twenty-one. That is nineteen years from now.

I. The VAWA Exemption Changes Everything as a Matter of Law

28. Under 8 U.S.C. § 1255(a), a VAWA self-petitioner may adjust status to lawful permanent residence even if he entered without inspection. USCIS has explicitly interpreted this provision as effectively waiving inadmissibility under INA § 212(a)(6)(A)(i), the EWI bar, for approved VAWA self-petitioners. Michael Aytes, Memorandum: Adjustment of Status for VAWA Self-Petitioner Present Without Inspection, USCIS (Apr. 11, 2008). Mr. Mekonnen does not need to leave the country to obtain lawful status. His path to a green card lies entirely inside the United States, through USCIS, without consular processing or departure.

V. LEGAL CLAIMS

Count One — Herrera Avila v. Bondi Acknowledged; Statutory Argument Preserved for Supreme Court Review

29. On March 25, 2026, the Eighth Circuit in *Herrera Avila v. Bondi*, No. 25-3248, held that 8 U.S.C. § 1225(b)(2)(A) applies to noncitizens apprehended in the interior who entered without inspection, treating them as applicants for admission subject to mandatory detention without bond.
30. Petitioner acknowledges that *Avila* is binding on this Court and that a statutory bond hearing claim under § 1226(a) is unlikely to succeed in the Eighth Circuit at this time. Petitioner preserves this issue for further review, including potential Supreme Court consideration given the existing circuit split between the Eighth and Fifth Circuits on one side, and the Second, Sixth, and Seventh Circuits on the other. Petitioner does not rely on this as a primary ground for relief.
31. Instead, Petitioner relies on the Fifth Amendment Due Process Clause, the unique statutory exemption VAWA self-petitioners hold from EWI bars, and the fundamental liberty interest of his U.S. citizen daughter in not being permanently separated from her father. *Avila* did not address and could not foreclose any of these claims.

Count Two — Fifth Amendment Due Process Requires a Bond Hearing to Prevent Permanent Separation from a U.S. Citizen Child

32. Even under *Avila*, the Fifth Amendment's Due Process Clause independently requires an individualized bond hearing on the specific facts of this case. The *Avila* court decided a question of statutory interpretation. It did not hold that the Due Process Clause never requires a bond hearing for any EWI detainee regardless of length of detention, family ties, pending humanitarian relief, or the presence of a U.S. citizen child. This Court retains independent constitutional authority to grant relief.

33. The Supreme Court's three-part balancing test from *Mathews v. Eldridge*, 424 U.S. 319, 335 (1976), governs the procedural protections required before the government may deprive a person of liberty. Each factor weighs decisively in Mr. Mekonnen's favor.
34. First, the Private Interest. Mr. Mekonnen's interest in the companionship of his two-year-old daughter is a fundamental liberty interest protected by the Due Process Clause. *Troxel v. Granville*, 530 U.S. 57, 65 (2000). The severance of the parent-child relationship triggers the highest level of constitutional protection. *Santosky v. Kramer*, 455 U.S. 745 (1982). That liberty interest is not diminished by his immigration status.
35. Second, the Risk of Erroneous Deprivation. The risk that continued detention will permanently sever Mr. Mekonnen's relationship with Naomi is not speculative. It is already occurring. The custodial parent has cut off all contact. Mr. Mekonnen is detained over two thousand miles away, with no ability to initiate family court proceedings, appear at hearings, or enforce any visitation right. No individualized determination of his dangerousness or flight risk has ever been made. The government has placed him in a cell without any hearing of any kind. *Zadvydas v. Davis*, 533 U.S. 678, 690 (2001).
36. Third, the Government's Interest. The government has no legitimate interest in detaining a man with no criminal record, a U.S. citizen daughter, and a pending VAWA self-petition without any individualized assessment of whether he is actually a danger or flight risk. The government cannot claim a legitimate interest in permanently separating a father from his daughter in the absence of any finding of parental unfitness or danger to the child. *Ms. L v. ICE*, 310 F. Supp. 3d 1133 (S.D. Cal. 2018). Under *Mathews*, the balance compels release.

Count Three — VAWA Self-Petitioners Are Not Seeking Admission Within the Meaning of Avila

37. The Avila court's holding rests on the reasoning that EWI entrants who have no path to lawful status without departing and re-entering are perpetual applicants for admission because they must someday seek admission to regularize their status. That reasoning does not apply to a VAWA self-petitioner.

38. Under 8 U.S.C. § 1255(a), a VAWA self-petitioner may adjust status to lawful permanent resident inside the United States without leaving the country and without consular processing. The ordinary bars of INA § 245(c)(2) and § 245(c)(7), which prevent EWI entrants from adjusting, do not apply to VAWA self-petitioners. USCIS has formally interpreted § 245(a) as effectively waiving inadmissibility under INA § 212(a)(6)(A)(i) for any alien with an approved VAWA self-petition. Ayles Memorandum, USCIS (Apr. 11, 2008). Mr. Mekonnen will never need to depart and seek admission. He will adjust status here.
39. Because Mr. Mekonnen has a legally viable, in-country path to lawful permanent residence, the rationale underlying Avila's mandatory detention holding does not reach him. He is not, in any meaningful sense, seeking admission. He is awaiting adjudication of a petition that will allow him to remain exactly where he is, as a lawful permanent resident, without ever leaving. The government's asserted interest in mandatory detention under § 1225(b)(2) is substantially diminished when the detainee has a VAWA-based path to a green card that requires no departure and no future admission. No Eighth Circuit decision has addressed this question. It is an issue of first impression.

Count Four — The Combination of VAWA Self-Petition, Prior Parole, and U.S. Citizen Child Requires a Bond Hearing

40. Three independent factors, considered together, demonstrate that this case falls outside the scope of Avila and independently requires a bond hearing under the Fifth Amendment.
41. First, the pending VAWA self-petition. Congress enacted the VAWA self-petition so that abusive U.S. citizen spouses cannot use their control over an immigrant's status as a weapon that outlasts the marriage. By detaining Mr. Mekonnen without any individualized hearing while his VAWA petition is pending, the government is completing what the abuser threatened throughout the marriage: deportation to Eritrea, a country he fled because of persecution. That outcome is irreconcilable with the statutory scheme Congress created.
42. Second, prior formal parole. Mr. Mekonnen was formally paroled into the United States under 8 U.S.C. § 1182(d)(5)(A) following his initial 2018 detention. Parole required an affirmative determination by immigration authorities that his release served humanitarian

purposes. He then engaged formally with the immigration system through asylum proceedings, marriage, and a VAWA petition. His immigration history is materially different from a person who simply crossed the border and remained without any formal immigration engagement.

43. Third, his U.S. citizen daughter. No Eighth Circuit case, including *Avila*, has addressed § 1225(b)(2) detention where a VAWA self-petitioner has a U.S. citizen child facing permanent separation from her father. The government has already determined by granting parole that Mr. Mekonnen's presence serves humanitarian interests. His pending VAWA petition confirms he is a survivor of abuse. His daughter N[REDACTED] is a U.S. citizen. Under these circumstances, the government cannot detain him without any bond hearing consistent with the Fifth Amendment.
44. At any bond hearing ordered by this Court, the government must bear the burden of proving by clear and convincing evidence that Mr. Mekonnen is a danger or a flight risk. *Singh v. Holder*, 638 F.3d 1196, 1200-01 (9th Cir. 2011). The adjudicator must consider ability to pay and alternatives to detention, including GPS monitoring and supervised release. *Hernandez v. Sessions*, 872 F.3d 976, 991 (9th Cir. 2017). The adjudicator must also consider the impact of continued detention on N[REDACTED]. The government cannot meet its burden.

VI. EXHAUSTION OF ADMINISTRATIVE REMEDIES IS NOT REQUIRED

45. Petitioner has not sought a bond hearing from the ICE Field Office Director or the immigration court because any such request would be futile. Following *Herrera Avila v. Bondi* and the now-vacated *Matter of Yajure Hurtado*, 29 I&N Dec. 1 (BIA 2025), ICE field offices in the Eighth Circuit uniformly deny bond hearings to EWI detainees without regard to VAWA petitions, U.S. citizen children, or humanitarian factors. Requiring Petitioner to request a hearing that Respondents will automatically deny would be a futile act and is not required before seeking habeas relief. Petitioner has no adequate administrative remedy to exhaust.

VII. RELIEF REQUESTED

For the foregoing reasons, Mr. Mekonnen respectfully requests that this Court:

- A. Issue an order to show cause requiring Respondents to demonstrate why the writ of habeas corpus should not be granted;
- B. Order Mr. Mekonnen's immediate release from detention pending final adjudication of his VAWA I-360 self-petition (Receipt No. [REDACTED]), on the grounds that mandatory detention under 8 U.S.C. § 1225(b)(2) does not apply to VAWA self-petitioners who may adjust status inside the United States without departure, and that his removal is not reasonably foreseeable within the meaning of *Zadvydas v. Davis*, 533 U.S. 678 (2001);
- C. In the alternative, if this Court declines to order immediate release, order Respondents to provide Mr. Mekonnen with an individualized bond hearing before an immigration judge within fourteen (14) days of this Court's order, at which the government shall bear the burden of proving by clear and convincing evidence that he is a danger to the community or a flight risk, and at which the immigration judge shall consider alternatives to detention and the best interests of his two-year-old United States citizen daughter, N [REDACTED]
- D. Order that if Mr. Mekonnen is released or granted bond, Respondents are enjoined from re-detaining him on the same grounds asserted in this petition absent a new and material change in circumstances; and
- E. Grant such other and further relief as the interests of justice and the welfare of his United States citizen daughter require.

EMERGENCY REQUEST FOR EXPEDITED CONSIDERATION

Petitioner respectfully requests emergency consideration of this petition. His two-year-old United States citizen daughter, N[REDACTED] is facing permanent and irreparable separation from her father. Every day of delay is a day a toddler goes without her father through no fault of either of them. Petitioner respectfully requests that Respondents be ordered to respond within seven (7) days of service of this petition.

Respectfully submitted,

/s/Abeba Attles

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Counsel for Petitioner,
Dawit Abraham Mekonnen

Dated: May 29, 2026

VERIFICATION

I, Dawit Abraham Mekonnen, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that I have read the foregoing Petition for Writ of Habeas Corpus and that the factual statements contained therein are true and correct to the best of my knowledge and belief. I am currently confined at St. Genevieve County Detention Center, 5 Basler Drive, Ste. Genevieve, Missouri 63670.

/S/DAWIT ABRAHAM MEKONNEN
DAWIT ABRAHAM MEKONNEN
A-Number: A 

Dated: May 29, 2026

CERTIFICATE OF SERVICE

I hereby certify that on May 29, 2026, a true and correct copy of the foregoing Petition for Writ of Habeas Corpus was served upon Respondents and upon the Office of the United States Attorney for the Eastern District of Missouri by certified U.S. mail, return receipt requested, and by electronic service where available:

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/s/Abeba Attles
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EXHIBIT LIST

Exhibit A: Order of Administrative Closure, Immigration Judge Kyra Lilien, December 21, 2023	1-2
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