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10 UNITED STATES DISTRICT COURT
11 SOUTHERN DISTRICT OF CALIFORNIA

12 ABDALLAH GHAZI MOHD
13 ZAMOUT,

14 Petitioner,

15 v.

16 CHRISTOPHER LAROSE, Warden at
17 Otay Mesa Detention Center,
18 MARKWAYNE MULLIN, Secretary of
19 the Department of Homeland Security,
20 TODD BLANCHE, Attorney General,
21 TODD M. LYONS, Acting Director,
22 Immigration and Customs Enforcement,
23 GREGORY J. ARCHAMBEAULT,
24 Acting Field Office Director, San Diego
25 Field Office,

26 Respondents.

Case No.: 26-cv-03504-LL-BJW

**Petitioner's Traverse In Support of
Petition for Writ of Habeas Corpus**

1 Petitioner, by and through undersigned counsel, respectfully submits this Traverse in
2 response to Respondents' Return.

3
4 **I. RESPONDENTS DO NOT OPPOSE THE PETITION AND DEFER TO THE COURT**
5 **REGARDING THE APPROPRIATE RELIEF**

6 Respondents recognize that this Court and numerous other judges within this District
7 have repeatedly rejected the Government's position under materially indistinguishable facts.

8 Most significantly, Respondents expressly acknowledge that:

9 "The government acknowledges that this Court's prior decisions will control the result here if
10 the Court adheres to its prior decisions, as the facts are not materially distinguishable for
11 purposes of the Court's decision, and on that basis the government does not oppose the petition
and defers to the Court on the appropriate relief."

12 Because Respondents acknowledge that this Court's prior decisions control the outcome
13 of this case and do not oppose the Petition, the only remaining issue before the Court is the
14 appropriate remedy.

15
16 **II. RESPONDENTS' ASSERTION REGARDING PETITIONER'S NEW JERSEY**
17 **ARREST IS INCORRECT**

18 Respondents state that Petitioner's September 12, 2025 arrest for "Terroristic Threats"
19 remains unresolved. That assertion is incorrect.

20
21 On April 23, 2026, the Paterson Municipal Court, New Jersey, entered an Order of
22 Expungement concerning Petitioner's September 12, 2025 arrest. The Order of Expungement
23 expressly states that the matter "having resulted in an arrest/charge not resulting in conviction
24 or adjudication of delinquency (dismissal, acquittal, discharge without finding of guilt) for
25 Abdallah G. Zamout." See A true and correct copy of the Order of Expungement attached as
26 Exhibit A.
27
28

1 Accordingly, Respondents' assertion that the criminal matter remains unresolved is
2 incorrect. The criminal matter did not result in a conviction, has been fully resolved, and was
3 subsequently expunged by the Paterson Municipal Court, New Jersey.
4

5 **III. CONCLUSION**

6 Respondents acknowledge that this Court's prior decisions control under materially
7 indistinguishable facts and expressly state that they do not oppose the Petition and defer to the
8 Court regarding the appropriate relief.
9

10 Moreover, the only factual issue raised in the Return that Petitioner's September 12,
11 2025 New Jersey arrest remained unresolved, has been conclusively resolved. The attached
12 Order of Expungement confirms that the matter did not result in a conviction, was fully
13 resolved, and was subsequently expunged by the Paterson Municipal Court on April 23, 2026.
14

15 Accordingly, Petitioner respectfully requests that this Court grant the Petition for Writ
16 of Habeas Corpus and order petitioner's immediate release from ICE custody.
17

18
19 Respectfully submitted,

20 Dated: June 29, 2026

s/ David Semaan

David Semaan, Esq.

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2026, I caused the foregoing document to be electronically filed with the Clerk of the Court for the United States District Court for the Southern District of California by using the appellate CM/ECF system. Participants in the case are registered CM/ECF users and service will be accomplished by the appellate CM/ECF system.

Dated: June 29, 2026

s/ David Semaan

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