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Counsel for Petitioner

**UNITED STATES DISTRICT COURT**
**FOR THE EASTERN DISTRICT OF CALIFORNIA**
**FRESNO DIVISION**

Azamat Narynbekov

*Petitioner*

v.

WARDEN, of the Central Valley Annex Detention Facility; et al.,

*Respondents*

Civ. No.: 1:26-cv-05348 JLT-EPG

**PETITIONER'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL EXHIBIT; SUPPORTING DECLARATIONS OF PETITIONER AND OF COUNSEL; AND PROPOSED EXHIBIT "D".**

Agency No. [redacted]

The Court requested respondents to file Form I-213 missing from the Court's record. Respondents filed the Form I-213 as Exhibit A, and also filed unsolicited, Form I-200 (arrest warrant) as Exhibit B, and Form I-862 (charging document) as Exhibit C. Petitioner respectfully now moves for leave to file the attached proposed **Exhibit D**, titled "Petitioner's Transcription of Oklahoma Highway Patrol Warning Notice" concerning the May 24, 2026 arrest, which in fairness ought to be consider in quasi-similar situations encompassing FRE 106 rule of completeness. The filing is narrow and timely. It is offered to highlight facial representations of these exhibits reflecting that petitioner's arrest preceded the issuance of the arrest warrant dated May 25, 2026, which otherwise may be misinterpreted as satisfying the preceded warrant for a lawful arrest.

Respondents' Exhibit A reflects that, after a May 24, 2026 commercial-vehicle inspection, petitioner was arrested and taken to the Garvin County Jail. Exhibit B is dated May 25, 2026, and its certificate of service states that it was served on May 25, 2026. Proposed Exhibit D concerns that same encounter. It states that Trooper Clifford Boswell questioned petitioner during the inspection about immigration matters, reviewed petitioner's employment authorization card, called ICE, and took petitioner into custody after an ICE duty officer said petitioner was "arrestable." It further states that petitioner was transported to the Garvin County Jail on May 24, at approximately 11:15 a.m.

The proposed exhibit therefore provides context for Exhibit A and clarifies the chronology of Exhibit B: on the face of the submitted materials, the May 24 custody preceded the May 25 Form I-200. Petitioner does not ask the Court to resolve the legality of the detention through this motion. Proposed Exhibit D is petitioner's word-for-word transcription of the Highway Patrol Warning Notice. Petitioner submits the attached declaration to explain the exhibit's source and will file an original, certified, or otherwise authenticated copy if one becomes available. This limited filing requires no discovery and will not delay resolution. Petitioner respectfully requests that the Court grant leave to file proposed Exhibit D and the attached declaration.

## CONCLUSION

The Court is requested to grant leave to file and consider the proposed Exhibit D, only for its relevance to the factual context and chronology of respondents' Exhibits A and B, without requiring the Court to decide through this motion any ultimate issue concerning the legality of the May 24, 2026 detention.

Respectfully submitted,

//s// Bernal Peter Ojeda
Bernal Peter Ojeda
Counsel for Petitioner
Azamat Narynbekov
Dated: August 15, 2026

## DECLARATION OF PETITIONER

My name is Azamat Narynbekov and I am the petitioner in this case. I declare that the following statements are based on my own personal knowledge and in support of the accompanying request, I state as follows:

1. I received a copy of an Oklahoma Highway Patrol warning notice concerning the May 24, 2026 commercial-vehicle inspection and my detention in Love County, Oklahoma after I was arrested.
2. Proposed Exhibit D is my word-for-word transcription of the contents of that notice, to the best of my ability.
3. I am in the custody of the federal respondents and cannot electronically transmit the original document outside the facility.
4. I am offering through my attorney proposed Exhibit D to provide context for the respondents' Exhibit A, requested by the Court and to clarify the chronology of respondents' Exhibit B.
5. I will promptly release the authenticated copy of the notice in my possession if the Court orders that the facility where I am detained allows me to transmit it electronically or via express mail.

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

/s/ Azamat Narynbekov
Azamat Narynbekov
Declarant and Petitioner
Dated: August 15, 2026

**DECLARATION OF COUNSEL BERNAL PETER OJEDA**

I, the undersigned, am counsel of record for the petitioner and declare the following statements based on my own personal knowledge:

1. I received a telephone call from my client, the petitioner in this case, on Thursday, August 13, 2026;
2. During that call, petitioner informed me for the very first time that in his possession he had a document given to him by the officer performing his arrest on May 24, 2026;
3. I asked him if he could take a photo or capture an image of the document;
4. Petitioner noted that he could was unable to do so while in the custody of the Warden at the Central Valley Annex where he is detained;
5. I asked him if there was any other way (fax, or other means) for him to let me look at the document's contents;
6. Petitioner offered to transcribe the document, word by word, and text it to me;
7. I accepted that offer and asked him to do so immediately;
8. Petitioner then proceeded to transcribe the document's content and forward it to my office via text.
9. I then copied the contents from the text and placed it on the blank page that is now designated as Exhibit D.

Executed under penalty of perjury under the laws of the United States, in Westlake Village this day, August 15, 2026.

//s// Bernal Peter Ojeda
Bernal Peter Ojeda
Declarant and
Counsel for Petitioner

# PROPOSED EXHIBIT D

**Petitioner's Transcription of**

**Oklahoma Highway Patrol Warning Notice**

**Concerning the May 24, 2026 arrest**

OKLAHOMA HIGHWAY PATROL WARNING NOTICE
General information:
Date 05/24/2026. Time 9:50
Trooper: Boswell
Badge#: 2008 Troop: Troop S
County: Love
Location: I-35 at 476 feet South of Mile Marker 13

PERSON INFORMATION
Name: Narynbekov, Azamat
DOB: [redacted] Phone: unknown
License: [redacted] State: IL
Class: A Endorsements: none
Restrictions: E
Height: [redacted] Weight: [redacted] Race: W Sex: M
Address: [redacted]

VEHICLE INFORMATION
Year: 2024. Color: Yellow Make: Freightliner Style: Cascadia
Tag: [redacted] State: IL. Vin: [redacted]
CMV: [redacted] Placard: [redacted] Hazmat: [redacted]
CARRIER [redacted]

REASON TITLE 8-IMMIGRATION
Officer remarks:

On 05/24/2026 at approximately 9:50am, POE officer Clifford Boswell was working at the Love County Port of Entry, conducting troop s regulatory inspections of commercial motor vehicles. Boswell observed a commercial motor vehicle entering the scale lane and directed the vehicle to the inspection bay to conduct a level one inspection. This conduct was lawful, based on Boswell's authority to contact regulatory inspections of commercial motor vehicles.

While in the inspection bay, Boswell made contact with the driver identified by an IL non-domiciled limited term CDL as Azamat Narynbekov from Schaumburg, IL. While speaking with Narynbekov, Boswell noticed Narynbekov was operating with non-domiciled limited term CDL and asked how long he had been in the US. Narynbekov stated he came over in November 2023. Boswell then asked Narynbekov if he had a work authorization card or visa. Narynbekov stated he has an Employment authorization card and presented it for review. Boswell noticed Narynbekov is originally from Kyrgyzstan, which is located in central Asia. Boswell asked Narynbekov how he came into the United States. Narynbekov stated that he went into Mexico and crossed the border in Tijuana.

Based on Narynbekov presenting a non-domiciled limited term CDL and an employment authorization card, Boswell developed reasonable suspicion that the subject was foreign-born and contacted immigration and customs enforcement (ICE) to verify immigration status. Boswell contacted ICE ERO on call duty officer for the OKC ICE ERO district and spoke with ICE agent Richard Callaway advised Boswell that Narynbekov is arrestable for Illegal entry into the United States and authorized Boswell to take Narynbekov into custody and transport him to the Garvin County Jail in Paul's Valley, OK.

At 11:15 am, Boswell advised Narynbekov that he is a port of entry officer with the Oklahoma Department of Public Safety and authorized by immigration and customs enforcement to enforce immigration volitions and advised Narynbekov that he is being arrested for illegal entry into the United States. Boswell then took Narynbekov into custody and transported him to Garvin CO jail in Pauls Valley, OK, where custody was transferred to jail personnel without incident.

POE officer: Clifford Boswell 2008
ICE credential number: OK-TFO- 000056

THIS NOT AN ARREST AND WILL NOT BECOME PART OF YOUR DRIVING RECORD.

This report documents that you were provided notice of a violation by a trooper or that information pertinent to a vehicle/trailer in transit was obtained for official records.