

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

QASEM SADI AL QASEM,

Petitioner,

v.

DHS ICE,

Respondent.

Civil Action No. 3:25-CV-00841-L-BK

**APPENDIX IN SUPPORT OF RESPONSE IN OPPOSITION**

COME(S) NOW Respondent(s), by and through the United States Attorney for the Northern District of Texas, and pursuant to Local Rule 7.1(i), file this separate, self-contained Appendix, consisting of Exhibit A and Attachments 1-3 in support of Respondent’s Response in Opposition.

<u>Tab</u>	<u>Exhibit</u>	<u>Page(s)</u>
A.	Declaration of Alex Hudson.....	APP. 001-004
	1. Order of Deferred Adjudication, <i>The State of Texas v. Qasem Sadi Alqasem</i> Case No. F-0820712-L, Dallas County Texas (Jan 11, 2010).....	APP. 005-011
	2. Immigration and Naturalization Service, <i>Notice to Appear (DHS Form I-862)</i> (Aug 24, 2006).....	APP. 012-014
	3. U.S. Immigration Court, <i>Removal Order - Memorandum of the Court’s Decision</i> (Apr 2, 2012).....	APP. 015-017

Respectfully submitted,

CHAD E. MEACHAM  
ACTING UNITED STATES ATTORNEY

/s/ Ann E. Cruce-Haag  
ANN E. CRUCE-HAAG  
Assistant United States Attorney  
Texas Bar No. 24032102  
1205 Texas Avenue, Suite 700  
Lubbock, Texas 79401  
Telephone: (806) 472-7351  
Facsimile: (806) 472-7394  
Email: [ann.haag@usdoj.gov](mailto:ann.haag@usdoj.gov)

Attorneys for Respondent

**CERTIFICATE OF SERVICE**

On May 21, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all parties electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Ann E. Cruce-Haag  
ANN E. CRUCE-HAAG  
Assistant United States Attorney

# **EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

Qasem Alqasem

Petitioner,

v.

U.S. Immigration and Customs  
Enforcement,

Respondent.

§  
§  
§  
§  
§  
§  
§  
§  
§  
§

Case No. 3:25-cv-841

DECLARATION OF ALEX HUDSON

In accordance with the provisions of Section 1746 of Title 28, United States Code, I, the undersigned, Alex Hudson, do hereby make the following declaration, under penalty of perjury in the above-styled and numbered cause:

1. I, Alex Hudson, am presently employed by the United States Department of Homeland Security (“DHS” or the “Department”), Immigration and Customs Enforcement (“ICE”), in the position of Deportation Officer.
2. My duties as a Deportation Officer include the review of alien files and monitoring the custody status of aliens who have a final order of removal. In carrying out this duty, I am responsible for monitoring the progress of obtaining travel documents necessary for removing aliens to the designated country of removal. As a Deportation Officer, I have access to records maintained in the ordinary course of business by ICE.

3. I am presently the Deportation Officer assigned to the case of Qasem Alqasem, alien file number XXXXXXXXXX3, a native of Kuwait and a citizen of Jordan. My involvement with ALQASEM's case has included monitoring his detention history, seeking to obtain travel documents, and reviewing custody determinations made in his case.
4. On or about August 24, 2006, ALQASEM was placed into immigration court proceedings. He bonded out of immigration custody and continued his immigration proceedings on the non-detained docket.
5. On April 2, 2012, ALQASEM was ordered removed from the United States to Jordan, and ALQASEM waived his right to appeal that decision. The case was then sent to Enforcement and Removal Operations ("ERO") for execution of the removal order. ALQASEM was not detained at this time.
6. On April 1, 2025, ALQASEM was taken into ICE custody and served removal paperwork. He was transferred to the Prairieland Detention Center pending removal.
7. On April 15, 2025, ERO mailed a travel document request to the Jordanian embassy, and the request remains pending.
8. I believe ALQASEM will be removed in the reasonably foreseeable future. ERO submitted a travel document request to the Jordanian embassy that contains a copy of ALQASEM's expired Jordan passport. ERO has therefore submitted strong evidence of ALQASEM's nationality to the Embassy of Jordan.
9. Based on Jordan's acceptance of flights, and the record of acceptance of Jordan citizens to Jordan, I believe ALQASEM's removal is significantly likely in the reasonably foreseeable future.

Sworn to and subscribed this 12th day of May 2025.

*A. Hudson*  
Alex Hudson  
Deportation Officer  
Department of Homeland Security  
Immigration and Customs Enforcement

# **ATTACHMENT 1**

# **ATTACHMENT 2**

U. S. Department of Justice  
Immigration and Naturalization Service

**Notice to Appear**

**In removal proceedings under section 240 of the Immigration and Nationality Act**

File No: [Redacted]  
Case No: [Redacted]  
FIN #: [Redacted]

In the Matter of:

Respondent: Qasem Sadi AL QASEM currently residing at:

1700 Cedar Hill, TX 75104  
(Number, street, city state and ZIP code)

(469) 231 9142  
(Area code and phone number)

- 1. You are an arriving alien.
- 2. You are an alien present in the United States who has not been admitted or paroled.
- 3. You have been admitted to the United States, but are deportable for the reasons stated below.

The Service alleges that you:

- 1) You are not a citizen or national of the United States;
- 2) You are a native of KUWAIT and a citizen of JORDAN;
- 3) You were admitted to the United States at Dallas, Texas on or about August 9, 2005 as a nonimmigrant visitor with authorization to remain in the United States for a temporary period not to exceed August 1, 2006;
- 4) You remained in the United States beyond August 1, 2006 without authorization from the Immigration and Naturalization Service.

On the basis of the foregoing, it is charged that you are subject to removal from the United States pursuant to the following provision(s) of law:

Section 237(a)(1)(B) of the Immigration and Nationality Act (Act), as amended, in that after admission as a nonimmigrant under Section 101(a)(15) of the Act, you have remained in the United States for a time longer than permitted, in violation of this Act or any other law of the United States.

- This notice is being issued after an asylum officer has found that the respondent has demonstrated a credible fear of persecution or torture.
- Section 235(b)(1) order was vacated pursuant to:  8 CFR 208.30(f)(2)  8 CFR 235.3(b)(5)(iv)

YOU ARE ORDERED to appear before an immigration judge of the United States Department of Justice at: 1100 Commerce Street Room 404 Dallas TEXAS US 75242

(Complete Address of Immigration Court, Including Room Number, if any)

on a date to be set at a time to be set to show why you should not be removed from the United States based on the charge(s) set forth above.

Date: 8/24/06

[Signature]  
Robert Thompson  
(Signature and Title of Issuing Officer)  
Irving, TX  
(City and State)

See reverse for important information

### Notice to Respondent

**Warning:** Any statement you make may be used against you in removal proceedings.

**Alien Registration:** This copy of the Notice to Appear served upon you is evidence of your alien registration while you are under removal proceedings. You are required to carry it with you at all times.

**Representation:** If you so choose, you may be represented in this proceeding, at no expense to the Government, by an attorney or other individual authorized and qualified to represent persons before the Executive Office for Immigration Review, pursuant to 8 CFR 3.16. Unless you so request, no hearing will be scheduled earlier than ten days from the date of this notice to allow you sufficient time to secure counsel. A list of qualified attorneys and organizations who may be available to represent you at no cost will be provided with this Notice.

**Conduct of the hearing:** At the time of your hearing, you should bring with you any affidavits or other documents which you desire to have considered in connection with your case. If any document is in a foreign language, you must bring the original and a certified English translation of the document. If you wish to have the testimony of any witnesses considered, you should arrange to have such witnesses present at the hearing.

At your hearing you will be given the opportunity to admit or deny any or all of the allegations in the Notice to Appear and that you are inadmissible or deportable on the charges contained in the Notice to Appear. You will have an opportunity to present evidence on your own behalf, to examine any evidence presented by the Government, to object, on proper legal grounds, to the receipt of evidence and to cross examine any witnesses presented by the Government. At the conclusion of your hearing, you have a right to appeal an adverse decision by the immigration judge.

You will be advised by the immigration judge before whom you appear, of any relief from removal for which you may appear eligible including the privilege of departing voluntarily. You will be given a reasonable opportunity to make any such application to the immigration judge.

**Failure to appear:** You are required to provide the INS, in writing, with your full mailing address and telephone number. You must notify the Immigration Court immediately by using Form EOIR-33 whenever you change your address or telephone number during the course of this proceeding. You will be provided with a copy of this form. Notices of hearing will be mailed to this address. If you do not submit Form EOIR-33 and do not otherwise provide an address at which you may be reached during proceedings, then the Government shall not be required to provide you with written notice of your hearing. If you fail to attend the hearing at the time and place designated on this notice, or any date and time later directed by the Immigration Court, a removal order may be made by the immigration judge in your absence, and you may be arrested and detained by the INS.

#### Request for Prompt Hearing

To expedite a determination in my case, I request an immediate hearing. I waive my right to have a 10-day period prior to appearing before an immigration judge.

\_\_\_\_\_  
(Signature of Respondent)

Before:

Date: \_\_\_\_\_

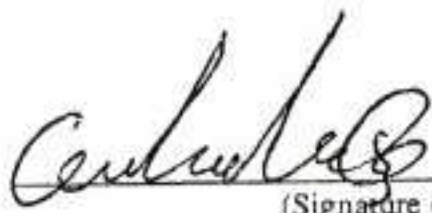
\_\_\_\_\_  
(Signature and Title of INS Officer)

#### Certificate of Service

This Notice to Appear was served on the respondent by me on August 24, 2006, in the following manner and in compliance with section 239(a)(1)(F) of the Act:  
(Date)

- in person                       by certified mail, return receipt requested                       by regular mail
- Attached is a credible fear worksheet.
- Attached is a list of organizations and attorneys which provide free legal services.

The alien was provided oral notice in the English language of the time and place of his or her hearing and of the consequences of failure to appear as provided in section 240(b)(7) of the Act.

  
(Signature of Respondent if Personally Served)

HUGO REX  
SPECIAL AGENT   
(Signature and Title of Officer)

# **ATTACHMENT 3**

UNITED STATES IMMIGRATION COURT  
1100 COMMERCE ST., ROOM 404  
DALLAS, TX 75242

IN THE REMOVAL CASE OF  
AL QASEM, QASEM SADI  
RESPONDENT

CASE NO.: 

ORDERS

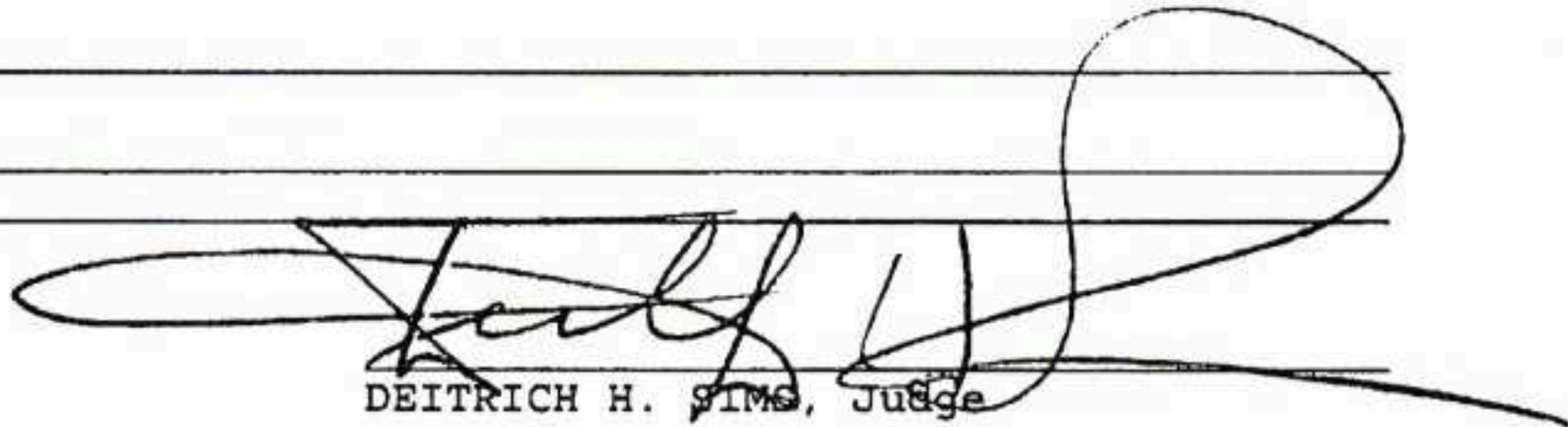
- This is a memorandum of the Court's Decision and Orders entered on 4/2/22. This memorandum is solely for the convenience of the parties. The oral or written Findings, Decision and Orders is the official opinion in this case. ( ) Both parties waived issuance of a formal oral decision in the case.
- The respondent was ordered REMOVED from the United States to JORDAN ( ) in absentia.
- [ ] Respondent's application for VOLUNTARY DEPARTURE was DENIED and respondent was ordered removed to \_\_\_\_\_, in the alternative to \_\_\_\_\_.
- [ ] Respondent's application for VOLUNTARY DEPARTURE was GRANTED until \_\_\_\_\_, upon posting a voluntary departure bond in the amount of \$ \_\_\_\_\_ to DHS within five business days from the date of this Order, with an alternate Order of removal to \_\_\_\_\_ or \_\_\_\_\_. Respondent shall present to DHS within ( ) thirty days ( ) sixty days from the date of this Order, all necessary travel documents for voluntary departure.
- [ ] Respondent's application for ASYLUM was ( ) granted ( ) denied ( ) withdrawn with prejudice. ( ) subject to the ANNUAL CAP under the INA section 207(a)(5). ( ) Respondent knowingly filed a FRIVOLOUS asylum application.
- [ ] Respondent's application for WITHHOLDING of removal under INA section 241(b)(3) was ( ) granted ( ) denied ( ) withdrawn with prejudice.
- [ ] Respondent's application for WITHHOLDING of removal under the Torture Convention was ( ) granted ( ) denied ( ) withdrawn with prejudice.
- [ ] Respondent's application for DEFERRAL of removal under the Torture Convention was ( ) granted ( ) denied ( ) withdrawn with prejudice.
- [ ] Respondent's application for CANCELLATION of removal under section ( ) 203(b) of NACARA, ( ) 240A(a) ( ) 240A(b)(1) ( ) 240A(b)(2) of the INA, was ( ) granted ( ) denied ( ) withdrawn with prejudice. If granted, it was ordered that the DHS issue all appropriate documents necessary to give effect to this Order. Respondent ( ) is ( ) is not subject to the ANNUAL CAP under INA section 240A(e).
- [ ] Respondent's application for a WAIVER under the INA section \_\_\_\_\_ was ( ) granted ( ) denied ( ) withdrawn or ( ) other \_\_\_\_\_. ( ) The conditions imposed by INA section 216 on the respondent's permanent resident status were removed.
- [ ] Respondent's application for ADJUSTMENT of status under section \_\_\_\_\_ of the ( ) INA ( ) NACARA ( ) \_\_\_\_\_ was ( ) granted ( ) denied ( ) withdrawn with prejudice. If granted, it was ordered that DHS issue all appropriate documents necessary to give effect to this Order.

CASE NUMBER: XXXXXXXXXX

RESPONDENT: AL QASEM, QASEM SADI

- Respondent's status was RESCINDED pursuant to the INA section 246.
- Respondent's motion to WITHDRAW his application for admission was  granted  denied. If the respondent fails to abide by any of the conditions directed by the district director of DHS, then the alternate Order of removal shall become immediately effective without further notice or proceedings: the respondent shall be removed from the United States to \_\_\_\_\_.
- Respondent was ADMITTED as a \_\_\_\_\_ until \_\_\_\_\_ . As a condition of admission, the respondent was ordered to post a \$ \_\_\_\_\_ bond.
- Case was  TERMINATED  with  without prejudice  ADMINISTRATIVELY CLOSED.
- Respondent was orally advised of the LIMITATION on discretionary relief and consequences for failure to depart as ordered.
  - If you fail to voluntarily depart when and as required, you shall be subject to civil money penalty of at least \$1,000, but not more than \$5,000, and be ineligible for a period of 10 years for any further relief under INA sections 240A, 240B, 245, and 248 (INA Section 240B(d)).
  - If you are under a final order of removal, and if you willfully fail or refuse to 1) depart when and as required, 2) make timely application in good faith for any documents necessary for departure, or 3) present yourself for removal at the time and place required, or, if you conspire to or take any action designed to prevent or hamper your departure, you shall be subject to civil money penalty of up to \$500 for each day under such violation. (INA section 274D(a)). If you are removable pursuant to INA 237(a), then you shall further be fined and/or imprisoned for up to 10 years. (INA section 243(a)(1)).
- Other:

Date: Apr 2, 2012



DEITRICH H. SIMS, Judge

APPEAL:  ) waived  reserved by  Respondent  DHS  Both

DUE BY:

CERTIFICATE OF SERVICE

THIS DOCUMENT WAS SERVED BY:  MAIL  PERSONAL SERVICE

TO:  DHS  ALIEN  Alien's ATT/REP  ALIEN c/o Custodial Officer

DATE: 4/2/12 BY:  COURT STAFF  JUDGE CT