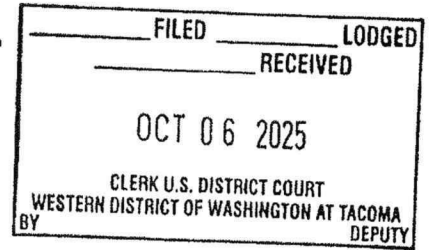


**UNITED STATES DISTRICT COURT
WESTERN OF WASHINGTON
TACOMA DIVISION**



TAREQ ZIAD FOUAD ZAKARNEH

Petitioner,


V.

**IMMIGRATION CUSTOM ENFORCEMENT
ET AL,**

Respondent,


Case No . 2:25-cv-00707-DGE - GJL

**REPLY TO RELEASE THE PETITIONER
LEGAL WORK**

The respondent respond to the petitioner through the court that the respondent has logistic issue by to return his legal work with his property, the logistic chaos from the respondent to release his legal work does not establish no violation versus the petitioner, their officer Daniel Strazelczyk refuse to release his cell after they release partially of his property on July,23,2025, as the government talk his cell phone for cloning and search without a warrant or a probable cause with a violation of the petitioner fourth amendment right, the property was copied by the  which it was admitted to the petitioner by officer

1| **REPLY TO RELEASE THE PETITIONER LEGAL WORK**

Daniel Strzelczyk on September,06,2025 *see Tareq Zakarneh Declaration EX.A*, the petitioner asking the court to grant him an order to force the respondent to delete and erase any information that has been saved on their computers and Data center and charge them with Fed.R.Crim P.41(g), the government is not entitled to keep any copies or data from the petitioner cell phone or computer or his property, there was no probable cause or a warrant to search his property or any criminal charges against the petitioner *See Matta v. United States, 753 F.Supp.3d 194*.

In an interview between the petitioner and officer Daniel officer Daniel admit to Zakarneh that 

The petitioner is seeking the following relief:

- (1)Return of all copies content data information taken by the government from his electronic device
- (2)To have the government identifies all searches or review conducted on his device.
- (3)The government must provide a sworn statement to satisfy the equitable relief and file a sworn and an affidavit confirming such a deletion.


Respectfully accept our reply.

This dated on October,02,2025

/s/ Tareq Zakarneh
Tareq Zakarneh, Petitioner

EX.A

Tareq Zakarenh Declaration

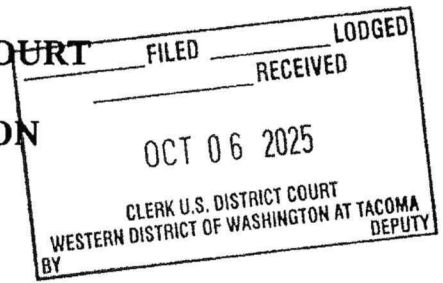
I declare under penalty and perjury that officer Daniel Strzelczyk informed me on September ,06,2205 in my interview with him to convince me to depart the country on commercial flight with him and another officer and stop my litigation because I have for the third time a volunteer departure order from the DOJ , in our conversation officer Daniel admit to me that  and they still have a copy of my cell phone which its violation of my fourth amendment , the government does not have the right to clone or copy of my personal property information which it include text messages and emails between and my lawyers which it should be protected under the client privacy and privileges with my lawyer , I sworn under penalty and perjury that what I was told by officer Daniel Strzelczyk on Septemeber,06,2025.

This is Dated on 10.02.2025

/s/ Tareq Zakarenh

Tareq Zakarenh, Petitioner

**UNITED STATES DISTRICT COURT
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TAREQ ZIAD FOUAD ZAKARNEH

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Respondent,

Case No . 2:25-cv-00707-DGE - GJL

Certificate of Service

I Tareq Zakarneh hereby certify that on October,02,2025 that I served the respondent reply to respondent respond to petitioner's motion to release his legal work the first class mail at the address below:

United States Attorney
1201 Pacific Ave, ste 700
Tacoma, WA 98402

This dated on October,02,2025

**/s/ Tareq Zakarneh
Tareq Zakarneh, Petitioner**

1| **Certificate of Service**