

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

SADIQ SADRUDIN LAKHANI,	)	CIVIL ACTION NO. 25-cv-00763
Petitioner	)	SEC. P
	)	
VERSUS	)	JUDGE TERRY A. DOUGHTY
	)	
PAMELA BONDI, ET AL	)	MAGISTRATE JUDGE PEREZ-
Respondents	)	MONTES

ANSWER AND RETURN TO PETITION FOR A WRIT OF *HABEAS CORPUS*

Federal Respondents, in their official capacities, in response to the application for a writ of *habeas corpus* filed by the Petitioner, Sadiq Sadrudin Lakhani (Lakhani), allege and aver:

ADMITTED FACTS

Those facts set forth within the Memorandum of Law, filed contemporaneously with this Answer, are incorporated and alleged herein by reference.

FIRST DEFENSE

The jurisdiction of this Court extends solely to Lakhani's pure claim relating to his continued detention by the United States Immigration and Customs Enforcement.

SECOND DEFENSE

Lakhani has failed to state a claim upon which relief can be granted. He has failed to establish that there is **no** significant likelihood of his removal in the

reasonably foreseeable future.

THIRD DEFENSE

Lakhani is a native and a citizen of India ordered removed from the United States of America as inadmissible for being present in the United States without being admitted or paroled, or who arrived in the United States at any time or place other than as designated by the Attorney General. 8 U.S.C. § 1182(a)(6)(A)(i). Petitioner is currently in ICE custody pending his removal, after the revocation of his Order of Supervision. A travel document has been requested from India and his removal is likely in the reasonably foreseeable future. Thus, the continued detention of Sadiq Sadrudin Lakhani pending his removal from the United States of America comports with all statutory and regulatory provisions governing the detention of aliens pending removal from the United States of America.

FOURTH DEFENSE

All allegations of fact not otherwise admitted to or conceded within this answer or the attached memorandum in support of this answer are denied.

WHEREFORE, it is prayed that this answer and return to the application for the issuance of a writ of *habeas corpus* filed by Sadiq Sadrudin Lakhani be deemed sufficient and, after due proceedings are had and for the reasons set forth within the Memorandum of Law filed with this answer, the petition should be dismissed with prejudice. It is further prayed that all legal and equitable relief that the named Respondents may otherwise be entitled to issue forthwith.

Respectfully submitted,

ALEXANDER C. VAN HOOK
Acting United States Attorney

BY: s/ Karen J. King
KAREN J. KING (#23508)
Assistant United States Attorney
Western District of Louisiana
800 Lafayette Street, Suite 2200
Lafayette, Louisiana 70501
Telephone: (337) 262-6618
Facsimile: (337) 262-6693
Email: karen.king@usdoj.gov

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
ALEXANDRIA DIVISION**

SADIQ SADRUDIN LAKHANI, Petitioner	)	CIVIL ACTION NO. 25-cv-00763
	)	SEC. P
	)	
VERSUS	)	JUDGE TERRY A. DOUGHTY
	)	
PAMELA BONDI, ET AL	)	MAGISTRATE JUDGE PEREZ-
Respondents	)	MONTES

MEMORANDUM OF LAW

I. INTRODUCTION

On June 2, 2025, Sadiq Sadrudin Lakhani, Petitioner, filed an application with this Court through which he seeks the issuance of a writ of *habeas corpus* directing his release from the institutional detention maintained by the United States Immigration and Customs Enforcement (ICE). ECF 1. According to Petitioner, his continued detention within the institutional custody of ICE is violative of his Fifth Amendment due process rights. ECF 1 at 8-9. For the following reasons, Petitioner's application should be denied and this action dismissed.

II. THE FACTUAL BACKGROUND

In 2014, Petitioner, Sadiq Sadrudin Lakhani (Lakhani,) a native and citizen of India, was convicted of Access Device Fraud and sentenced to serve six months in federal prison. *See U.S. v. Sadiq Sadrudin Lakhani*, No. 4:12CR40024-01, Dkt. 36, (W.D. Ark. Sept. 4, 2014); *see also*, Declaration of Robert M. Ainley, Assistant Field Office Director (AFOD), attached hereto as Gvmt. Ex. A at ¶ 4. Following Lakhani's

service of his federal sentence, he came into ICE's custody and was issued a Notice to Appear, charging him as removable on the basis that he entered the United States at an unknown place and on an unknown date without being admitted or paroled. Gvmt. Ex. A at ¶ 4. Lakhani was found to be inadmissible and ordered removed from the United States to India on June 23, 2015. Gvmt. Ex. A at ¶ 4. Ten months later, he was released on an Order of Supervision (OSUP). Gvmt. Ex. A at ¶ 4.

Lakhani re-entered ICE custody on February 24, 2025, following the revocation of his OSUP. Gvmt. Ex. A at ¶ 4. He was served with instructions detailing his obligation to assist with his removal. Gvmt. Ex. A at ¶ 5. Despite being warned of his requirement to assist in his removal, Lakhani has not provided ICE with his Indian identification number. Gvmt. Ex. A at ¶ 5. The lack of identification initially delayed his travel document request. Gvmt. Ex. A at ¶ 5. However, in June 2025, ICE completed a travel document request, which was submitted to the Indian Consulate, and it is anticipated that a travel document will be received within the reasonably foreseeable future. Gvmt. Ex. A at ¶ 6. Further, ICE conducted a Post Order Custody Review in June 2025 and determined Lakhani was a flight risk, given his manner of entry into the country, his non-citizen status, and the likelihood of his removal. Gvmt. Ex. A at ¶ 6; *see also*, 8 U.S.C. § 1231 (a)(6).

III. ARGUMENT

A. Kahlani is not entitled to Immediate Release under *Zadvydas*¹.

Kahlani is under a final order of removal and is detained pursuant to 8 U.S.C. § 1231(a). § 1231(a)(1)(A) provides that the Attorney General has 90 days after an order of removal becomes final in which to effect an alien's removal. Although ICE has 90 days to remove an alien after he is ordered removed under § 1231 (a)(1)(A), the Supreme Court has held that § 1231 permits the detention beyond 90 days, for a period reasonably necessary to bring about that alien's removal from the United States. Pursuant to *Zadvydas*, detention for up to six months after the removal order becomes final is "presumptively reasonable." *Zadvydas v. Davis*, 533 U.S. 678, 701 (2001).

The Supreme Court clearly indicated that the lapse of the presumptive period does not mandate release and concluded that, "[t]o the contrary, an alien may be held in confinement until it has been determined that there is no significant likelihood of removal in the reasonably foreseeable future." *Zadvydas*, 121 S.Ct. at 2505. Conversely, detention beyond the six-month period is not presumptively unreasonable and ICE may continue to detain an alien if there is a significant likelihood of removal within the reasonably foreseeable future. *See e.g. Janvier v. INS*, 174 F.Supp.2d 430, 436, n. 10 (E.D. Va. 2001). Thus, to state a claim for relief

¹ In *Clark v. Martinez*, 543 U.S. 371 (2005), the Supreme Court held that its ruling in *Zadvydas* applies equally to inadmissible aliens.

under the *Zadvydas* decision, an alien must: 1) establish post-removal order detention more than six months at the time of the filing of his or her petition; and 2) establish good reason to believe that there is no significant likelihood of removal in the reasonably foreseeable future. *See e.g. Akinwale v. Ashcroft*, 287 F.3d 1050, 1052 (11th Cir. 2002).

To satisfy his burden under the second prong:

[A]n alien's claim must be supported by more than mere “speculation and conjecture.” In order to shift the burden to the Government, an alien must demonstrate that “the circumstances of his status” or the existence of “particular individual barriers to his repatriation” to his country of origin are such that there is no significant likelihood of removal in the reasonably foreseeable future. If the alien fails to come forward with an initial offer of proof, the petition is ripe for dismissal.

Galtoabah v. Sessions, No. 6:18-CV-00880, 2019 WL 3766280, at *2 (W.D. La. June 18, 2019), *report and recommendation adopted*, No. 6:18-CV-00880, 2019 WL 3761637 (W.D. La. Aug. 8, 2019) (internal citations omitted).

In addition, inadmissible aliens, who have been determined to be either a risk to the community or unlikely to comply with the removal order, may be detained beyond the removal period. 8 U.S.C. § 1231(a)(6).

Here, Lakhani was initially in ICE’s custody for approximately ten months before being released on an OSUP, and he has been in custody six months since the revocation of his OSUP. Gvmt. Ex. A at ¶ 4. Even though Lakhani’s detention exceeds the presumptively reasonable six-month period, he fails to show that there is no

significant likelihood of removal in the reasonably foreseeable future. *Singh v. DHS/ICE*, 771 F. Supp. 2d 372, 377 (D.N.J. 2011) (“Alien's detention of more than 305 days continued to be authorized by [8 U.S.C. § 1231] after removal order became administratively final because he alleged no facts to substantiate the conclusion that there was good reason to believe that there was no significant likelihood of his removal to India in the reasonably foreseeable future so as to require government to respond with evidence sufficient to rebut that showing.”)

Nor has Lakhani identified any “particular individual barriers to his repatriation” to India. *Galtogbah v. Sessions*, *supra*. Thus, Lakhani fails to meet the second prong of the *Zadvydas* analysis, and his petition should be dismissed.

Lakhani is subject to an administratively final order of removal as an inadmissible alien. He has been determined to be a flight risk. His travel document for removal to India has been requested, and it is anticipated that ICE will receive a travel document for his removal in the reasonably foreseeable future. Therefore, the continued detention of Lakhani, pending his removal, is reasonable. *Zadvydas* demands nothing more. Moreover, Lakhani has been afforded post order custody review since he re-entered ICE's custody in February 2024. While Lakhani may disagree with the conclusion reached during the custody review, the discretionary determination to continue custody is not itself subject to judicial review. 8 U.S.C. § 1252(a)(2)(B).

Further, due process does not require a specialized bond hearing in the instant case, because the applicable statutes and regulations already provide extensive protections to all non-citizens detained pursuant to § 1231. Specifically, federal regulations require “special review procedures” where a noncitizen subject to a final order of removal is detained after the presumptively reasonable six-month period. 8 C.F.R. § 241.13(a). Under those regulations, where a noncitizen provides good reason to believe there is no significant likelihood of removal in the foreseeable future, the noncitizen may seek release from post-removal-period ICE detention. *Id.* § 241.13(d)(1). Additionally, federal regulations require periodic ICE custody reviews of an alien's detention. *Id.* § 241.4. Lakhani has been detained since February 24, 2025. ICE has conducted a custody review since then. Gvmt Ex. A. at ¶ 6. These safeguards lessen the risk of erroneous deprivation.

It is undisputed that Lakhani entered the U.S. without being detected at an unknown location and at an unknown time. Later, he was convicted of Access Device Fraud. Although Lakhani was released on an OSUP in 2016, the priorities within the Department of Homeland Security have changed and Lakhani is now a priority removal. Gvmt Ex. A. at ¶ 4.

Lakhani's detention does not violate due process, and he is not entitled to an individualized bond hearing.

B. Lakhani Cannot Invoke Habeas to Challenge the Conditions of His Confinement.

Lakhani incorporates several allegations of related to his health and medical care in ICE's custody. ECF No. 1 at ¶ 15. However, a civil rights action, rather than a habeas action, is the proper vehicle for any constitutional challenges to his conditions of confinement and to seek release.

A petitioner may seek habeas relief under § 2241 if he is “in custody in violation of the Constitution or laws or treaties of the United States.” 28 U.S.C. § 2241(c). The United States Court of Appeals for the Fifth Circuit has clarified that “habeas is not available to review questions unrelated to the cause of detention.” *Foster v. Prator*, 5:22-CV-01940, 2022 WL 18456945 (W.D. La. 9/22/22), report and recommendation adopted, 2023 WL 373884 (W.D. La. 2023) (citing *Rice v. Gonzalez*, 985 F.3d 1069, 1070 (5th Cir. 2021), *cert. denied*, 142 S. Ct. 216 (2021); *Perez v. Zook*, 3:20-CV-02092, 2022 WL 348664, at *1 (N.D. Tex. 2022), report and recommendation adopted, 2022 WL 347608 (N.D. Tex. 2022). Habeas exists solely to “grant relief from unlawful imprisonment or custody and it cannot be used properly for any other purpose.” *Pierre v. United States*, 525 F.2d 933, 935–36 (5th Cir. 1976).

Thus, where a prisoner challenges the conditions of his confinement or prison procedures, the proper vehicle is a civil rights action if a determination in the prisoner's favor would not automatically result in his accelerated release. *Carson v. Johnson*, 112 F.3d 818, 820-21 (5th Cir. 1997); *see also Poree v. Collins*, 866 F.3d 235, 243-44 (5th Cir. 2017) (summarizing general Fifth Circuit principles and noting

circuit split as to whether conditions of confinement claims can be brought in habeas petitions); *Cook v. Hanberry*, 596 F.2d 658, 660 (5th Cir. 1979) (noting the proper remedy for unconstitutional conditions of confinement should be equitable—to correct the unlawful practices that make the conditions intolerable). To the extent that Lakhani challenges the conditions of his confinement, this Court lacks jurisdiction over such claims brought in this habeas action.

IV. CONCLUSION

For the foregoing reasons, Federal Respondents request that the Court deny Lakhani's Petition and Amended Petition for a Writ of Habeas Corpus Under 28 U.S.C. § 2241.

Respectfully submitted,

ALEXANDER C. VAN HOOK
Acting United States Attorney

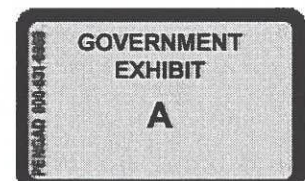
BY: s/ Karen J. King
KAREN J. KING (#23508)
Assistant United States Attorney
Western District of Louisiana
800 Lafayette Street, Suite 2200
Lafayette, Louisiana 70501
Telephone: (337) 262-6618
Facsimile: (337) 262-6693
Email: karen.king@usdoj.gov

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

DECLARATION OF ROBERT M. AINLEY AFOD

I, Robert M. Ainley, hereby declare that, to the best of my knowledge, information, and belief, and under the penalty of perjury, the following is true and correct:

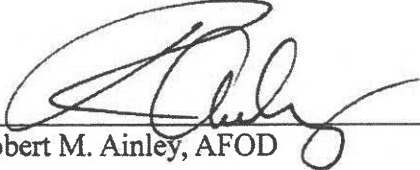
1. I am employed by U.S. Department of Homeland Security (DHS), Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), and currently serve as AFOD. I have held this position since June 16, 2024. I have been employed by ICE since October 2016.
2. In my current position, I manage several aspects of the immigration enforcement process, including the identification and arrest, transportation, detention, case management, and removal of noncitizens. In this capacity, I manage ERO personnel and provide oversight over a number of detention facilities within the New Orleans Field Office, including the Winn Correctional Center.
3. I have prepared this declaration at the request of the U.S. Department of Justice, the United States Attorney's Office, Western District of Louisiana, in connection with a petition for a writ of habeas corpus filed by Sadiq Sadrudin Lakhani (herein referred to as "Petitioner"), who has been assigned the alien registration number AXXX-XXX-642. I make this declaration based on my review of DHS electronic databases and documents contained in the alien administrative file (Alien File) pertaining to Petitioner, which are attached.
4. Petitioner is a native and citizen of India, who entered the United States at an unknown place and on an unknown date without being admitted or paroled. Ex. A-1. On September 3, 2014, he was convicted of Access Device Fraud and sentenced to serve 6 months. 18 U.S.C. §§ 1029(a)(5) & (c)(1)(A)(ii). He came into ICE custody following the completion of his federal sentence and entered removal proceedings as an inadmissible alien. Petitioner was ordered removed from the United States to India on June 23, 2015. Ex. A-2. He was subsequently released on an Order of Supervision (OSUP) on April 5, 2016. Ex. A-3. Petitioner re-entered ICE custody on February 24, 2025, following the revocation of his OSUP. Ex. A-4.
5. On April 9, 2025, Petitioner was served with a Warning for Failure to Depart, which provided instructions regarding his obligation to assist in his removal. Ex. A-5. Travel document requests often require the identification number of the native or accepting country. In Petitioner's case, he did not provide ICE with his Indian identification number, indicating that he was unable to recall the number, which delayed his travel document request.



6. On June 25, 2025, ICE conducted a Post Order Custody Review. Based upon ICE's review of Petitioner's file, ICE declined to parole him from custody pursuant to INA § 212(d)(5) because he was determined to be a flight risk. Ex. A-6.
7. On June 25, 2025, a Temporary Document Request was submitted to the Indian Consulate. ICE expects to receive the necessary travel documents to effectuate Petitioner's removal in the reasonably foreseeable future; therefore, his continued detention is in the public interest.

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

8/12/2025
Executed on this Date


Robert M. Ainley, AFOD

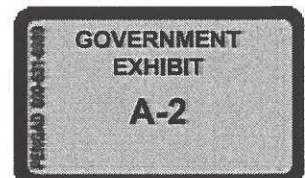
UNITED STATES IMMIGRATION COURT
1100 COMMERCE ST., SUITE 1060
DALLAS, TX 75242

IN THE REMOVAL CASE OF
LAKHANI, SADIQ SADRUDIN
RESPONDENT

CASE NO.: A-642

ORDERS

- ☒ This is a memorandum of the Court's Decision and Orders entered on 8/13/25. 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 DALLAS, TX ☐ in absentia.
- ☒ Respondent's application for VOLUNTARY DEPARTURE was DENIED and respondent was ordered removed to DALLAS, TX, 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.



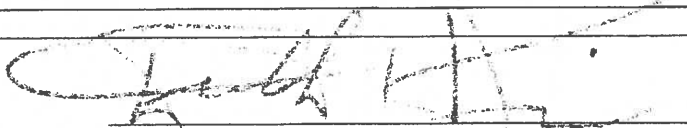
CASE NUMBER:

-642

RESPONDENT: LAKHANI, SADIQ SADRUDIN

- ☐ 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: June 23, 2015


DEITRICH H. SIMS, JudgeAPPEAL: (☒) 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: 6/23/15 BY: ☒ COURT STAFF ☐ JUDGE SH

U.S. Department of Homeland Security
Immigration and Customs Enforcement

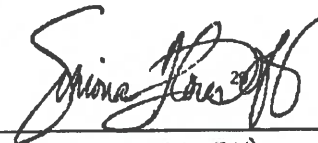
Order of Supervision

File No: 642
Date: 04/05/2016Name: LAKHANI, SADIQ SADRUDINon 06/23/2015 were ordered:
(Date of final order)

- ☐ Excluded or deported pursuant to proceedings commenced prior to April 1, 1997.
☒ Removed pursuant to proceedings commenced on or after April 1, 1997.

Because the Service has not effected your deportation or removal during the period prescribed by law, it is ordered that you be placed under supervision and permitted to be at large under the following conditions:

- ☒ That you appear in person at the time and place specified, upon each and every request of the Service, for identification and for deportation or removal.
- ☒ That upon request of the Service, you appear for medical or psychiatric examination at the expense of the United States Government.
- ☒ That you provide information under oath about your nationality, circumstances, habits, associations, and activities and such other information as the Service considers appropriate.
- ☒ That you do not travel outside OKLAHOMA for more than forty-eight (48) hours without first having notified this Service office of the dates and places of such proposed travel.
- ☒ That you furnish written notice to this Service office of any change of residence or employment within forty-eight (48) hours of such change.
- ☒ That you report in person to a NON-DETAINED OFFICER on APRIL 20, 2016 to the service office at: IMMIGRATION & CUSTOMS ENFORCEMENT, 4400 SW 44TH STREET, SUITE A, OKLAHOMA CITY, OK unless you are granted written permission to report on another date.
- ☒ That you assist Immigration and Customs Enforcement in obtaining any necessary travel documents.
- ☒ Other: Abide by the telephonic reporting requirements given to you.
- ☒ See attached sheet containing other specified conditions (Continue on separate sheet if required)



(Signature of ICE official)

Simona L. Flores, Field Office Director, Dallas, TX
(Print name and title of ICE official)

Alien's Acknowledgment of Conditions of Release under an Order of Supervision

I hereby acknowledge that I have (read) (had interpreted and explained to me in the English / Spanish language) the contents of this order, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, detention, or prosecution.


CHARNELE DEAN WRIGHT
(Signature of ICE official serving order)

Deportation Officer

X S.S. Lakhani
(Signature of alien)04/05/2016
Date

U.S. Department of Homeland Security
Immigration and Customs Enforcement

Continuation Page for Form: **I-220B**[illegible]

U.S. Department of Homeland Security
Immigration and Customs Enforcement

Order of Supervision-Addendum

File No: 642Date: 04/05/2016Name: LAKHANI SADIO SADRUDIN S.L.

- ☒ That you do not associate with known gang members, criminal associates, or be associated with any such activity.
- ☐ That you register in a substance abuse program within fourteen (14) days and provide ICE with written proof of such within thirty (30) days. The proof must include the name, address, duration, and objectives of the program as well as the name of a program counselor.
- ☐ That you register in a sexual deviancy counseling program within fourteen (14) days and provide ICE with written proof of such within thirty (30) days. You must provide ICE with the name of the program, the address of the program, duration and objectives of the program as well as the name of a counselor.
- ☐ That you register as a sex offender, if applicable, within seven (7) days of being released, with the appropriate agency(s) and provide ICE with written proof of such within ten (10) days.
- ☒ That you do not commit any crimes or be associated with any criminal activity while on this Order of Supervision.
- ☒ That you report to any parole or probation officer as required within three (3) business days and provide ICE with written verification of the officers name, address, telephone number, and reporting requirements.
- ☒ You must follow all reporting and supervision requirements as mandated by the parole or probation officer.
- ☒ That you continue to follow any prescribed doctors orders whether medical or psychological, including taking prescribed medications.
- ☒ That you make good faith and timely efforts to obtain a travel document and assist ICE in obtaining a travel document.
- ☒ That you submit a complete application for a travel document to all appropriate Embassies or Consulates, including those representing the countries of MEXICO. You must present ICE with evidence that each Embassy or Consulate to which you apply has received your request and all required documents. This may be done, for example, by mailing your application(s) with a request for return receipt and providing the signed return receipt to ICE, by obtaining a tracking number when you mail your application(s) and providing the number to ICE, or by submitting written confirmation of receipt issued by the Embassy or Consulate.
- ☒ That you submit your application(s) for a travel document to all appropriate Embassies or Consulates and provide proof of receipt to ICE on or before _____.
- ☒ That you provide ICE a copy of your applications(s) for a travel document that you submit to any Embassy or Consulate, including all supporting documents, photos, and other items provided to the Embassy or Consulate to support your application(s).

- ☒ That you provide ICE a copy of all correspondence related to your travel document application(s) that you send to, or receive from, an Embassy or Consulate.
- ☒ That you contact the Embassy or Consulate within twenty-one (21) calendar days of making your application(s) to confirm that the information you provided is sufficient.
- ☒ That you comply with any requests from an Embassy or Consulate for an interview and make good faith efforts to submit further documentation if required by the Embassy or Consulate.
- ☒ Every time you report in person under this Order of Supervision, you must inform the local ICE office of all actions you have taken to obtain a travel document. You must provide any available written documentation to ICE regarding these actions and the status of your travel document application(s).
- ☒ That you provide ICE, upon request, with any and all information relevant to application(s) for a travel document. This may include, but is not limited to, information regarding your family history, including dates of birth, nationalities, addresses, and phone numbers as requested for such persons, whether in your country of nationality and/or citizenship or elsewhere, and your past residences, schools attended, etc.
- ☒ You will participate in a supervised release program, as described in the attached document. You will comply with the rules and requirements of this program, and cooperate with its administrators.

I agree to comply with the rules, requirements, and administrators in the supervised release program described in the attached document.

Alien's signature X S. S. Lakhani Date 04/05/2016

☐ Other. _____

Any violation of any of the above conditions may result in a fine, more restrictive release conditions, return to detention, criminal prosecution, and/or revocation of your employment authorization document.

Alien's Acknowledgment of Conditions of Release under an Order of Supervision

I hereby acknowledge that I have (read) (had interpreted and explained to me in the English / Spanish language) the contents of this order and addendum, a copy of which has been given to me. I understand that failure to comply with the terms of this order may subject me to a fine, more restrictive release conditions, detention, criminal prosecution, and/or revocation of my employment authorization document.

Charnel Dean Wright
CHARNEL DEAN WRIGHT
(Signature of ICE official serving order)

Deportation Officer

X S. S. Lakhani
(Signature of alien)

04/05/2016
Date

Enforcement and Removal Operations
New Orleans Field Office

U.S. Department of Homeland Security
1250 Poydras Street, Suite 350
New Orleans, LA 70113



U.S. Immigration and Customs Enforcement

Lakhani, Sadiq Sadrudin

A 642



Notice of Revocation of Release

This letter is to inform you your case has been reviewed. It has been determined you will be kept in the custody of U.S. Immigration and Customs Enforcement (ICE) at this time. This decision has been made based on a review of your file and/or your personal interview, in light of your failure to abide by one or more conditions of your prior order of supervision dated April 1, 2016.

1. *That you do not commit any crimes while on this Order of Supervision.*
2. *You were found to currently be a priority for removal*

Based on the above, and pursuant to 8 CFR 241.13, you are to remain in ICE custody at this time. You will promptly be afforded an informal interview at which you will be given an opportunity to respond to the reasons for the revocation. If you are not released after the informal interview, you will receive notification of a new review, which will occur within approximately three months of the date of this notice.

You are advised you must demonstrate you are making reasonable efforts to comply with the order of removal, and you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to effect your removal. You are also advised any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 USC Section 1253(a).

LARRY R ADAMS

Digitally signed by LARRY R

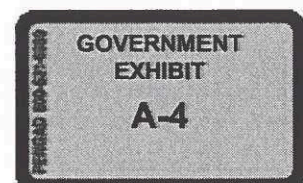
ADAMS

Date: 2025.02.24 13:31:25 -06'00'

Assistant Field Office Director, Larry Adams

02/24/2025

Date



Notice of Revocation of Release

Lakhani, Sadiq Sadrudin, A

642

Page 2

PROOF OF SERVICE

(1) Personal Service (Officer to complete both (a) and (b) below.)

(a) I, Michael Dumont, DO,
Name of ICE Officer Title
certify that I served Lakhani, Sadiq Sadrudin with a copy of
Name of detainee
this document at New Orleans Field Office on 02/24/2025, at 1100.
Institution Date Time

(b) I certify that I served the custodian _____,
Name of Official
_____, at _____, on
Title Institution
_____ with a copy of this document.
Date

OR

(2) Service by certified mail, return receipt. (Attach copy of receipt)

I _____, _____, certify
Name of ICE Officer Title
that I served _____ and the custodian _____,
Name of detainee Name of Official
with a copy of this document by certified mail at _____ on _____.
Institution Date

() cc: Attorney of Record or Designated Representative
() cc: A-File

A 

*Office of Enforcement and Removal Operations
New Orleans Field Office*

U.S. Department of Homeland Security

560 Gum Springs Road
Winnfield, Louisiana 71483



**U.S. Immigration
and Customs
Enforcement**

LAKHANI, Sadiq Sadrudin
c/o Immigration and Customs Enforcement
NOL Field Office

642

Decision to Continue Detention

This letter is to inform you that your custody status has been reviewed, and it has been determined that you will not be released from the custody of U.S. Immigration and Customs Enforcement (ICE) at this time. This decision has been made based on a review of your file, consideration of the information you submitted to ICE's reviewing officials, and upon review of the factors for consideration set forth at 8 C.F.R. § 241.4(e), (f), and (g).

As explained below, after such review, ICE has determined to maintain your custody because:

You have not demonstrated that, if released, you will not:

Pose a significant risk of flight pending your removal from the United States.
Subsequently, ICE is in receipt of or expects to receive the necessary travel documents to effectuate your removal, and removal is practicable, likely to occur in the reasonably foreseeable future, and in the public interest.

ICE has made such determination based upon: Your manner of entry into the United States and your subsequent order of removal by Immigration Judge on June 24, 2015.

Based on the above, you are to remain in ICE custody pending your removal from the United States as ICE is unable to conclude that the factors set forth at 8 C.F.R. § 241.4(e) have been satisfied. You are advised that you must demonstrate that you are making reasonable efforts to comply with the order of removal and that you are cooperating with ICE's efforts to remove you by taking whatever actions ICE requests to affect your removal. You are also advised that any willful failure or refusal on your part to make timely application in good faith for travel or other documents necessary for your departure, or any conspiracy or actions to prevent your removal or obstruct the issuance of a travel document, may subject you to criminal prosecution under 8 U.S.C. § 1253(a).

If you have not been released or removed from the United States at the expiration of the three-month period after this 90-day review, jurisdiction of the custody decision in your case will be

www.ice.gov

A

642

74

Decision to Continue Detention

LAKHANI, Sadiq Sadrudin

Page 2

transferred to the ICE Headquarters (ERO Removal Division), Potomac Center North, 500 12th Street SW, Washington, DC 20536. The ERO Removal Division will thereafter conduct a custody review and will make a determination regarding whether you will continue to be detained pending removal or may be released.

To assist in the ERO Removal Division custody review, you will be afforded a personal interview. You and your representative who has filed a Form G-28, Notice of Entry of Appearance, if any, will be notified of the date and time of the interview approximately 30 days prior to the scheduled interview date. This interview may be in person or through a video teleconference. If ERO needs to change the date of the interview, ERO will provide notice to you and your representative who has filed a Form G-28, Notice of Entry of Appearance, if any.

You may be accompanied during the interview by a person of your choice, subject to security requirements at the detention facility, as long as this person is able to attend the interview at the scheduled time.

You may submit any additional documentation in English if you wish to be considered in support of your release at the time of the interview or via mail service up to five business days prior to the scheduled time of your interview to the following address:

**Immigration and Customs Enforcement
New Orleans Field Office
560 Gum Springs Rd.
Winnfield, LA 71483
Attn: ICE**

Such documentation should contain a cover letter indicating that the material is submitted in support of your Post Order Custody Review personal interview. An attorney or other person may submit materials on your behalf.

You are required to complete the below information.

I do _____ do not x want a personal interview.

If you do want an interview, please check the appropriate box(es) below:

☐ Check this box if you need an interpreter for your interview.
Language/Dialect: _____

☐ I will be assisted at this interview by a representative of my own choosing.

Name: _____

If your representative has not filed a G-28, Notice of Entry of Appearance, on your behalf, you are responsible for notifying any other person you have selected to assist you

A

642

75

Decision to Continue Detention

LAKHANI, Sadiq Sadrudin

Page 3

of the date, time, and location of the interview. The representative must be at least 18 years of age.

You will be sent a separate Notice to Alien of Interview for Review of Custody Status approximately 30 days before the interview is scheduled. If you wish to request additional time to prepare for the interview, you must notify your deportation officer within five business days of receipt of the Notice of Interview. If ERO agrees to postpone the interview at your request, you will be deemed to have waived its completion prior to jurisdiction over your case transferring to the ERO Removal Division.

You will be notified of the decision in your case when the custody review has been concluded by the ERO Removal Division.


For Brian C. Acuna
Acting New Orleans
Field Office Director

6/25/2025

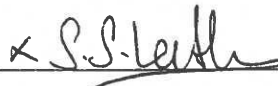
Date

PROOF OF SERVICE

(Officer to complete both (a) and (b) below.)

(a) I F. Askew, DO,
Name of ICE Officer Title
certify that I served Sadiq Sadrudin LAKHANI with a copy of
Name of detainee
this document at WINN CORRECTIONAL CENTER on 6/30/2025 at 0945.
Institution Date Time

(b) I certify that I served the custodian F. Askew.
Name of Official
DO at WCC on
Title Institution
6/30/2025 with a copy of this document.
Date

Detainee Signature:  Date: June 30, 2025

() cc: Attorney of Record or Designated Representative

() cc: A-File