

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA

ALEXANDRIA DIVISION

ALIREZA ZAREFARD)	CIVIL ACTION NO: 1:25-cv-00895
)	SECTION: P
VERSUS)	JUDGE EDWARDS
NEW ORLEANS FIELD OFFICE)	MAGISTRATE JUDGE PEREZ-MONTES
FOR THE U.S. IMMIGRATION)	
AND CUSTOMS ENFORCEMENT,)	
<u>ET AL.</u>)	

SUPPLEMENTAL RESPONSE TO PETITION FOR WRIT OF HABEAS CORPUS

NOW COME Respondents, by and through undersigned counsel who, in compliance with the Court’s Memorandum Order [Doc. 16], supplements the Response to the Petition for Writ of Habeas Corpus as follows:

Respondents’ transport of Petitioner to the airport on multiple occasions with the intent of placing him on an airplane to Iran demonstrates repeated efforts to effect Petitioner’s deportation pursuant to the final order of removal issued by the immigration judge. See Declaration of Justin Williams, Deportation Officer, Department of Homeland Security, Immigrations and Customs Enforcement, Enforcement and Removal Operations, attached hereto as Government Exhibit A.

Petitioner has been issued a valid passport. Ex. A, ¶ 4.

Respondents initially attempted to remove Petitioner on November 4, 2024 when Department of Homeland Security officials scheduled him for an escorted removal from JFK Airport. However, due to unknown reasons, Petitioner was cut from the transfer flight. In December 2024, shortly after this first attempt to return Petitioner to Iran, all flights to Tehran via Istanbul were cancelled indefinitely. Ex. A, ¶ 5.

On June 28, 2025, Petitioner was scheduled for an unescorted removal. Yet, that flight was cancelled upon an advisement that there would be no removals to Iran until further notice. Ex. A, ¶ 6.

Respondents' next attempt at removal occurred on September 29, 2025 when the Department of Homeland Security tried to board Petitioner on a Special High Risk Charter flight. Yet, Petitioner was pulled from this removal mission after being classified as a "no-show/no documents." Ex. A, ¶ 7.

Finally, on November 17, 2025, Respondents reserved Petitioner a seat on a charter flight that was scheduled to depart on December 5, 2025. Petitioner was pulled from this mission because Petitioner's removal was not approved by the Enforcement and Removal Operations Iranian attaché. Ex. A, ¶ 8.

Enforcement and Removal Operations is continuing to work with Department of Homeland Security components and with the Iranian attaché to coordinate and effect Petitioner's removal. Ex. A, ¶ 9.

These continued effort increase the likelihood of removal in the reasonably foreseeable future. Therefore, the Petition for Writ of Habeas Corpus should be denied.

Respectfully submitted,

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